



Final Initial Study and Mitigated Negative Declaration

for

PacifiCorp
Lassen Substation Project
(Application No. A.15-11-005)

May 2017

Prepared for:
California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, California 94102

Prepared by:
DUDEK

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

TABLE OF CONTENTS

| <u>Section</u> | <u>Page No.</u> |
|--|------------------------|
| ACRONYMS AND ABBREVIATIONS..... | ACR-1 |
| PREFACE..... | P-1 |
| Introduction/Overview | P-1 |
| Contents of the Final IS/MND..... | P-2 |
| Public Review Process | P-2 |
| References Cited | P-3 |
| MITIGATED NEGATIVE DECLARATION | MND-1 |
| Introduction..... | MND-1 |
| Project Description..... | MND-2 |
| Project Objective..... | MND-3 |
| Applicant Proposed Measures..... | MND-3 |
| Mitigation Measures | MND-8 |
| Environmental Determination..... | MND-10 |
| Review Period..... | MND-10 |
| 1 INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM..... | 1-1 |
| 1.1 Project Title..... | 1-1 |
| 1.2 Lead Agency Name and Address..... | 1-1 |
| 1.3 Contact Person and Phone Number | 1-1 |
| 1.4 Project Location | 1-1 |
| 1.5 Project Sponsor's Name and Address..... | 1-1 |
| 1.6 General Plan Designation | 1-2 |
| 1.7 Zoning..... | 1-2 |
| 1.8 Description of Project | 1-2 |
| 1.9 Surrounding Land Uses and Setting | 1-2 |
| 1.10 Other Public Agencies Whose Approval Is Required..... | 1-3 |
| 2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED | 2-1 |
| 3 ENVIRONMENTAL DETERMINATION | 3-1 |
| 4 PROJECT DESCRIPTION | 4-1 |
| 4.1 Introduction..... | 4-1 |
| 4.2 Project Objectives | 4-1 |
| 4.3 Project Location | 4-2 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

TABLE OF CONTENTS (CONTINUED)

| <u>Section</u> | <u>Page No.</u> |
|---|------------------------|
| 4.4 Project Elements | 4-11 |
| 4.4.1 Substation..... | 4-12 |
| 4.4.2 Transmission Line Upgrades | 4-17 |
| 4.4.3 Distribution Line Upgrades..... | 4-18 |
| 4.4.4 Decommissioning | 4-18 |
| 4.5 Project Land Requirements..... | 4-19 |
| 4.6 Construction Activities | 4-19 |
| 4.6.1 Substation Construction..... | 4-22 |
| 4.6.2 Overhead Transmission and Distribution Line Construction | 4-23 |
| 4.6.3 Underground Distribution..... | 4-27 |
| 4.6.4 Mount Shasta Substation Demolition and Removal of Old Distribution Lines | 4-27 |
| 4.7 Construction Schedule | 4-28 |
| 4.8 Operation and Maintenance | 4-31 |
| 4.9 Applicant Proposed Measures..... | 4-31 |
| 4.10 Key Permits and Approvals | 4-36 |
| 4.11 References Cited | 4-37 |
| 5 ENVIRONMENTAL CHECKLIST AND DISCUSSION | 5.1-1 |
| 5.1 Aesthetics | 5.1-3 |
| 5.1.1 Environmental Setting | 5.1-3 |
| 5.1.2 Regulatory Setting | 5.1-15 |
| 5.1.3 Applicant Proposed Measures..... | 5.1-19 |
| 5.1.4 Environmental Impacts and Mitigation | 5.1-19 |
| 5.1.5 References Cited | 5.1-35 |
| 5.2 Agriculture and Forestry Resources..... | 5.2-1 |
| 5.2.1 Environmental Setting | 5.2-1 |
| 5.2.2 Regulatory Setting | 5.2-2 |
| 5.2.3 Applicant Proposed Measures..... | 5.2-5 |
| 5.2.4 Environmental Impacts and Mitigation | 5.2-5 |
| 5.2.5 References Cited | 5.2-7 |
| 5.3 Air Quality | 5.3-1 |
| 5.3.1 Environmental Setting | 5.3-1 |
| 5.3.2 Regulatory Setting | 5.3-5 |
| 5.3.3 Applicant Proposed Measures..... | 5.3-9 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

TABLE OF CONTENTS (CONTINUED)

| <u>Section</u> | <u>Page No.</u> |
|--|------------------------|
| 5.3.4 Environmental Impacts and Mitigation | 5.3-10 |
| 5.3.5 References Cited | 5.3-22 |
| 5.4 Biological Resources | 5.4-1 |
| 5.4.1 Environmental Setting | 5.4-1 |
| 5.4.2 Regulatory Setting | 5.4-9 |
| 5.4.3 Applicant Proposed Measures..... | 5.4-12 |
| 5.4.4 Environmental Impacts and Mitigation | 5.4-16 |
| 5.4.5 References Cited | 5.4-27 |
| 5.5 Cultural Resources | 5.5-1 |
| 5.5.1 Environmental Setting | 5.5-1 |
| 5.5.2 Regulatory Setting | 5.5-7 |
| 5.5.3 Applicant Proposed Measures..... | 5.5-13 |
| 5.5.4 Environmental Impacts and Mitigation | 5.5-14 |
| 5.5.5 References Cited | 5.5-15 |
| 5.6 Geology and Soils..... | 5.6-1 |
| 5.6.1 Environmental Setting | 5.6-1 |
| 5.6.2 Regulatory Setting | 5.6-5 |
| 5.6.3 Applicant Proposed Measures..... | 5.6-7 |
| 5.6.4 Environmental Impacts and Mitigation | 5.6-7 |
| 5.6.5 References Cited | 5.6-13 |
| 5.7 Greenhouse Gas Emissions..... | 5.7-1 |
| 5.7.1 Environmental Setting | 5.7-1 |
| 5.7.2 Regulatory Setting | 5.7-6 |
| 5.7.3 Applicant Proposed Measures..... | 5.7-13 |
| 5.7.4 Environmental Impacts and Mitigation | 5.7-14 |
| 5.7.5 References Cited | 5.7-16 |
| 5.8 Hazards and Hazardous Materials | 5.8-1 |
| 5.8.1 Environmental Setting | 5.8-1 |
| 5.8.2 Regulatory Setting | 5.8-11 |
| 5.8.3 Applicant Proposed Measures..... | 5.8-22 |
| 5.8.4 Environmental Impacts and Mitigation | 5.8-24 |
| 5.8.5 References Cited | 5.8-34 |
| 5.9 Hydrology and Water Quality..... | 5.9-1 |
| 5.9.1 Environmental Setting | 5.9-2 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

TABLE OF CONTENTS (CONTINUED)

| <u>Section</u> | <u>Page No.</u> |
|---|------------------------|
| 5.9.2 Regulatory Setting | 5.9-7 |
| 5.9.3 Applicant Proposed Measures..... | 5.9-13 |
| 5.9.4 Environmental Impacts and Mitigation | 5.9-14 |
| 5.9.5 References Cited | 5.9-24 |
| 5.10 Land Use and Planning | 5.10-1 |
| 5.10.1 Environmental Setting | 5.10-1 |
| 5.10.2 Regulatory Setting | 5.10-2 |
| 5.10.3 Applicant Proposed Measures..... | 5.10-11 |
| 5.10.4 Environmental Impacts and Mitigation | 5.10-11 |
| 5.10.5 References Cited | 5.10-15 |
| 5.11 Mineral Resources | 5.11-1 |
| 5.11.1 Environmental Setting | 5.11-1 |
| 5.11.2 Regulatory Setting | 5.11-2 |
| 5.11.3 Applicant Proposed Measures..... | 5.11-3 |
| 5.11.4 Environmental Impacts and Mitigation | 5.11-3 |
| 5.11.5 References Cited | 5.11-4 |
| 5.12 Noise | 5.12-1 |
| 5.12.1 Noise Background and Terminology | 5.12-1 |
| 5.12.2 Environmental Setting | 5.12-4 |
| 5.12.3 Regulatory Setting | 5.12-6 |
| 5.12.4 Applicant Proposed Measures..... | 5.12-8 |
| 5.12.5 Environmental Impacts and Mitigation | 5.12-9 |
| 5.12.6 References Cited | 5.12-15 |
| 5.13 Population and Housing | 5.13-1 |
| 5.13.1 Environmental Setting | 5.13-1 |
| 5.13.2 Regulatory Setting | 5.13-3 |
| 5.13.3 Applicant Proposed Measures..... | 5.13-4 |
| 5.13.4 Environmental Impacts and Mitigation | 5.13-4 |
| 5.13.5 References Cited | 5.13-6 |
| 5.14 Public Services..... | 5.14-1 |
| 5.14.1 Environmental Setting | 5.14-1 |
| 5.14.2 Regulatory Setting | 5.14-3 |
| 5.14.3 Applicant Proposed Measures..... | 5.14-4 |
| 5.14.4 Environmental Impacts and Mitigation | 5.14-4 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

TABLE OF CONTENTS (CONTINUED)

| <u>Section</u> | <u>Page No.</u> |
|--|------------------------|
| 5.14.5 References Cited | 5.14-6 |
| 5.15 Recreation | 5.15-1 |
| 5.15.1 Environmental Setting | 5.15-1 |
| 5.15.2 Regulatory Setting | 5.15-1 |
| 5.15.3 Applicant Proposed Measures..... | 5.15-2 |
| 5.15.4 Environmental Impacts and Mitigation | 5.15-2 |
| 5.15.5 References Cited | 5.15-3 |
| 5.16 Transportation and Traffic | 5.16-1 |
| 5.16.1 Environmental Setting | 5.16-1 |
| 5.16.2 Regulatory Setting | 5.16-4 |
| 5.16.3 Applicant Proposed Measures..... | 5.16-5 |
| 5.16.4 Environmental Impacts and Mitigation | 5.16-6 |
| 5.16.5 References Cited | 5.16-9 |
| 5.17 Utilities and Service Systems..... | 5.17-1 |
| 5.17.1 Environmental Setting | 5.17-1 |
| 5.17.2 Regulatory Setting | 5.17-2 |
| 5.17.3 Applicant Proposed Measures..... | 5.17-3 |
| 5.17.4 Environmental Impacts and Mitigation | 5.17-3 |
| 5.17.5 References Cited | 5.17-8 |
| 5.18 Mandatory Findings of Significance..... | 5.18-1 |
| 5.18.1 Environmental Impacts and Mitigation | 5.18-1 |
| 5.18.2 References Cited | 5.18-8 |
| 6 LIST OF PREPARERS AND AGENCY CONSULTATION | 6-1 |
| 6.1 Lead Agency | 6-1 |
| 6.2 Preparers | 6-1 |
| 6.3 Agency Consultation..... | 6-1 |

FIGURES

| | | |
|-----|---|------|
| 4-1 | Regional Location and Vicinity | 4-3 |
| 4-2 | Project Component Overview | 4-5 |
| 4-3 | Lassen Substation and Transmission Components | 4-7 |
| 4-4 | Distribution System Components | 4-9 |
| 4-5 | Substation Plan View | 4-13 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

TABLE OF CONTENTS (CONTINUED)

| | <u>Page No.</u> |
|--|------------------------|
| 4-6 Lassen Substation Plan and Elevation Views | 4-15 |
| 4-7 Temporary Work Areas, Access Areas, and Access Routes | 4-25 |
| 5.1-1 Existing Views Available from I-5 through the Project Area..... | 5.1-5 |
| 5.1-2 Existing Views Available from Hatchery Lane | 5.1-7 |
| 5.1-3 Existing Landscape Setting (1 of 2)..... | 5.1-9 |
| 5.1-4 Existing Landscape Setting (2 of 2)..... | 5.1-11 |
| 5.1-5 Viewpoint Locations | 5.1-25 |
| 5.1-6 Viewpoint 1: Old Stage Road | 5.1-27 |
| 5.1-7 Viewpoint 2: West Ream Avenue..... | 5.1-29 |
| 5.1-8 Viewpoint 3: I-5 | 5.1-33 |
| 5.8-1 Project Area Fire Hazard Severity Zones – State Responsibility Areas | 5.8-7 |
| 5.8-2 Project Area Fire Hazard Severity Zones – Local Responsibility Areas | 5.8-9 |
| 5.9-1 Hydrologic Features | 5.9-5 |

TABLES

| | |
|--|--------|
| 1 Applicant Proposed Measures..... | MND-3 |
| 2 Mitigation Measures | MND-9 |
| 1-1 Required Permits and Approvals | 1-3 |
| 4-1 Permanent and Temporary Acreages Required to Construct and Operate the Project | 4-19 |
| 4-2 Estimated Personnel and Equipment | 4-19 |
| 4-3 Proposed Schedule for Construction of the Project | 4-29 |
| 4-4 Applicant Proposed Measures..... | 4-31 |
| 4-5 Required Permits and Approvals | 4-36 |
| 5.3-1 Federal and State Attainment Classification Northeast Plateau Air Basin (Siskiyou County) | 5.3-3 |
| 5.3-2 Local Ambient Air Quality Data..... | 5.3-4 |
| 5.3-3 Ambient Air Quality Standards | 5.3-6 |
| 5.3-4 Maximum Daily Construction Emissions – Demolition..... | 5.3-12 |
| 5.3-5 Maximum Daily Construction Emissions – Lassen Substation Construction | 5.3-12 |
| 5.3-6 Maximum Daily Construction Emissions – Transmission/Distribution Line Construction | 5.3-15 |
| 5.3-7 Maximum Daily Construction Emissions – Demolition of Mount Shasta Substation | 5.3-17 |
| 5.3-8 Maximum Daily Construction Emissions – Summary of Maximum Daily Emissions ... | 5.3-18 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

TABLE OF CONTENTS (CONTINUED)

| | <u>Page No.</u> |
|--|------------------------|
| 5.4-1 Vegetation Communities (Acreages)..... | 5.4-3 |
| 5.6-1 Soil Units and Characteristics..... | 5.6-2 |
| 5.7-1 GHG Sources in California..... | 5.7-5 |
| 5.7-2 Estimated Construction GHG Emissions..... | 5.7-14 |
| 5.9-1 Pre-Project versus Post-Project Impervious Surfaces..... | 5.9-20 |
| 5.10-1 Siskiyou County Land Use | 5.10-1 |
| 5.10-2 General Plan and Zoning Designations for the Proposed Project – Siskiyou County..... | 5.10-9 |
| 5.10-3 Consistency with Energy/Transmission-Specific County and City General Plan Policies | 5.10-13 |
| 5.12-1 County of Siskiyou General Plan Noise Element: Land Use Compatibility for Exterior Community Noise | 5.12-7 |
| 5.12-2 Construction Noise Sources | 5.12-10 |
| 5.13-1 Estimated Population Growth, Siskiyou County, 2015 to 2020 | 5.13-2 |
| 5.16-1 Existing Traffic Volumes in the Project Area along Interstate 5..... | 5.16-2 |
| 5.18-1 Foreseeable Projects in the Vicinity of the Proposed Project | 5.18-5 |
| 5.18-2 Analysis of Potential Cumulatively Considerable Impacts | 5.18-6 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

ACRONYMS AND ABBREVIATIONS

| Acronym | Meaning |
|-------------------|---|
| AB | Assembly Bill |
| ACSR | aluminum conductor steel-reinforced cable |
| APLIC | Avian Power Line Interaction Committee |
| APM | applicant proposed measure |
| APN | Assessor's Parcel Number |
| AST | aboveground storage tank |
| ASTM | American Society for Testing Materials |
| BMP | best management practice |
| BSA | biological study area |
| C&D | construction and demolition |
| CAAQS | California Ambient Air Quality Standards |
| CAFÉ | Corporate Average Fuel Economy |
| CAL FIRE | California Department of Forestry and Fire Protection |
| CalEEMod | California Emissions Estimator Model |
| Caltrans | California Department of Transportation |
| CARB | California Air Resources Board |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CESA | California Endangered Species Act |
| CFR | Code of Federal Regulations |
| CH ₄ | methane |
| CNDDDB | California Natural Diversity Database |
| CNEL | Community Noise Equivalent Level |
| CO | carbon monoxide |
| CO ₂ | carbon dioxide |
| CO ₂ E | carbon dioxide equivalent |
| CPUC | California Public Utilities Commission |
| CRHR | California Register of Historical Resources |
| CVRWQCB | Central Valley Regional Water Quality Control Board |
| CWA | Clean Water act |
| dBA | A-weighted decibel |
| DPR | Department of Parks and Recreation |
| DTSC | California Department of Toxic Substances Control |
| DWR | California Department of Water Resources |
| EIR | environmental impact report |
| EPA | U.S. Environmental Protection Agency |
| ESA | environmental site assessment |
| FAA | Federal Aviation Administration |
| FEMA | Federal Emergency Management Agency |
| FHSZ | Fire Hazard Severity Zone |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

| Acronym | Meaning |
|-------------------|---|
| FHWA | Federal Highway Administration |
| FMMP | Farmland Mapping and Monitoring Program |
| GHG | greenhouse gas |
| H ₂ O | water vapor |
| H ₂ S | hydrogen sulfide |
| HAP | hazardous air pollutant |
| HCFC | hydrochlorofluorocarbon |
| HDD | horizontal directional drilling |
| HFC | hydrofluorocarbon |
| HMP | Hazard Mitigation Plan |
| I | Interstate |
| IEEE | Institute of Electrical and Electronics Engineers |
| kcmil | thousand circular mil |
| kV | kilovolt |
| LBP | lead-based paint |
| L _{eq} | equivalent sound level |
| LSAA | Lake and Streambed Alteration Agreement |
| MGD | million gallons per day |
| MHz | megahertz |
| MMT | million metric tons |
| MM | Mitigation Measure |
| mpg | miles per gallon |
| MSDS | material safety data sheet |
| MT | metric tons |
| N ₂ O | nitrous oxide |
| NAAQS | National Ambient Air Quality Standards |
| NAHC | Native American Heritage Commission |
| NHTSA | National Highway Traffic Safety Administration |
| NO ₂ | nitrogen dioxide |
| NPDES | National Pollutant Discharge Elimination System |
| NRHP | National Register of Historic Places |
| NTU | Nephelometric Turbidity Unit |
| O ₃ | ozone |
| Pb | lead |
| PCB | polychlorinated biphenyl |
| PFC | perfluorocarbon |
| PGA | peak ground acceleration |
| PM ₁₀ | coarse particulate matter |
| PM _{2.5} | fine particulate matter |
| PRC | Public Resources Code |
| RCRA | Resource Conservation and Recovery Act |
| REC | recognized environmental condition |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

| Acronym | Meaning |
|-----------------|--|
| ROW | right-of-way |
| RWQCB | Regional Water Quality Board |
| SB | Senate Bill |
| SCAPCD | Siskiyou County Air Pollution Control District |
| SF ₆ | sulfur hexafluoride |
| SMARA | Surface Mining and Reclamation Act |
| SO ₂ | sulfur dioxide |
| SO ₄ | sulfates |
| SPCC | spill prevention, control, and countermeasure |
| SR-89 | State Route 89 |
| SWPPP | storm water pollution prevention plan |
| SWRCB | State Water Resources Control Board |
| TAC | toxic air contaminant |
| TMDL | total maximum daily load |
| US-97 | U.S. Route 97 |
| UST | underground storage tank |
| VdB | vibration decibel |
| WEAP | worker environmental awareness program |
| WWTP | Wastewater Treatment Plant |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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PREFACE

Introduction/Overview

The California Public Utilities Commission (CPUC) distributed the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the PacifiCorp Lassen Substation Project (proposed project) for public review on November 23, 2016, with the public review period ending on December 23, 2016. During that time, 59 comment letters were received.

This Final IS/MND was prepared pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.) and in accordance with the Guidelines for Implementation of CEQA (14 CCR 15000 et seq.). This Final IS/MND will be used by the CPUC (as the lead state agency), in conjunction with other information developed in the CPUC's formal record, to act on PacifiCorp's application for a Permit to Construct for the proposed project. Under CEQA requirements, the CPUC will adopt this Final MND if, based on the whole record, including the IS and comments received, it determines that there is no substantial evidence that the project will have a significant effect on the environment (14 CCR 15074(b)).

On December 23, 2016, the CPUC filed a Notice of Completion with the Governor's Office of Planning and Research (State Clearinghouse), published a Notice of Intent to Adopt a Mitigated Negative Declaration, and released the Draft IS/MND for a 30-day public review period. The Draft IS/MND was distributed to federal, state, and local agency representatives; property owners within 300 feet of the proposed project; and other interested individuals. Additionally, in compliance with CEQA, a public notice was published in the general circulation newspaper announcing the availability of the Draft IS/MND for public review. In accordance with Section 15105(b) of the CEQA Guidelines, the public review and comment period began on November 23, 2016, and ended on December 23, 2016. The CPUC established a comment phone line at 844.379.3477, fax line at 844.386.5633, email address at LassenSubstation@dudek.com, and website at <http://www.cpuc.ca.gov/environment/info/dudek/LassenSub/PacifiCorpLassenSub.htm> to enable the public to ask questions, provide comments, and obtain additional information on the proposed project analyzed in the Draft IS/MND. The CPUC also held a public meeting on Wednesday, December 7, 2016, at Mount Shasta Elementary School (501 Cedar Street, Mount Shasta, California, 96067) between 6:00 p.m. and 8:00 p.m. Comments were received during this public meeting, and copies of all written comments received on the Draft IS/MND are contained in Section 7 of this Final IS/MND.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Contents of the Final IS/MND

This Final IS/MND was prepared pursuant to the CEQA Guidelines, which outline all aspects of the preparation of a Draft IS/MND and its review, as well as the subsequent steps to preparing a Notice of Decision. This document incorporates comments received during the public review period, and contains responses from the lead agency (CPUC) to those comments (Section 7).

In addition, minor technical changes or additions were made to clarify information presented in the Draft IS/MND. These changes and additions to the Draft IS/MND do not raise new, important issues related to significant impacts on the environment. The Final IS/MND has been completely reprinted from the Draft IS/MND, and changes made since public review are signified as replacements, additions, or revisions to existing text. Revisions to existing text are signified by strikeout text (i.e., ~~strikeout~~) where text was removed, and by underlined text (i.e., underline) where text was added for clarification.

This Final IS/MND is an informational document prepared by the CPUC to be used by decision makers before approving or denying a proposed project. It consists of the following:

- An updated version of the Draft IS/MND that incorporates text changes to address public comments.
- A list of persons, organizations, and public agencies that commented on the Draft IS/MND (Section 7).
- Comments and recommendations received on the Draft IS/MND either verbatim or in summary, and the responses to those comments (Section 7).

Public Review Process

On November 23, 2016, the CPUC mailed a notice to relevant agencies, organizations, and individuals residing in the proposed project area announcing that the Draft IS/MND was available for public review. The CPUC established a comment phone line, fax line, email address, and website (see above for details) to enable the public to ask questions, provide comments, and obtain additional information on the proposed project analyzed in the Draft IS/MND.

Additionally, the CPUC held a public meeting on Wednesday, December 7, 2016, at Mount Shasta Elementary School (see above for details).

In accordance with Section 15105(b) of the CEQA Guidelines, the public review and comment period for the Draft IS/MND began on November 23, 2016, and ended on December 23, 2016. All comments received are presented and discussed in this document.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

References Cited

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

MITIGATED NEGATIVE DECLARATION

**PacifiCorp
Permit to Construct
A.15-11-005
Lassen Substation Project****INTRODUCTION**

Under Rules 2.4 and 2.5 of the California Public Utilities Commissions (CPUC) Rule of Practice and Procedure, on November 2, 2015, PacifiCorp (PacifiCorp or the applicant Applicant) filed an application (15-11-005) that included a Proponent's Environmental Assessment (PEA) and required fee with the CPUC for an Authority to Construct and for Deviation from Public Utilities Code Section 320 for the Lassen Substation Project (proposed project). On July 15, 2016, the applicant Applicant filed an amended application and an updated PEA to reflect proposed changes to the original filing. Accordingly, the amended application and PEA describes the proposed project.

Under the CPUC's Rules, approval of the proposed project must comply with the California Environmental Quality Act (CEQA), including assessment of the potential environmental impacts of the proposed project. This Mitigated Negative Declaration (MND) has been prepared based upon the assessment of the potential environmental impacts outline in the attached Initial Study (IS).

Pursuant to CEQA (California Public Resources Code, Section 21000 et seq.), the CPUC must prepare an IS for discretionary projects such as the proposed project to determine whether the proposed project may have a significant adverse effect on the environment. The IS uses the significance criteria outlined in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.).

Article 6, Section 15070, Decision to Prepare a Negative Declaration or Mitigated Negative Declaration, of the CEQA Guidelines states the following:

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- b) The initial study identifies potentially significant effects, but:
 - 1) Revisions in the project plans or proposals made by, or agreed to by, the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

- 2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment (14 CCR 15070).

Based on the analysis in the IS, it has been determined that all project-related environmental impacts would be reduced to a less than significant level with the incorporation of feasible applicant proposed measures (APMs; i.e., measures adopted by the applicant as project features) as well as four mitigation measures. Therefore, adoption of an MND will satisfy the requirements of CEQA.

The information contained in the proposed project's PEA and additional information requested by the CPUC during the PEA review were fully considered during the preparation of this Draft IS/MND.

Copies of the project application, PEA, and supporting technical studies are available on the project website at:

<http://www.cpuc.ca.gov/environment/info/dudek/LassenSub/PacifiCorpLassenSub.htm>

PROJECT DESCRIPTION

Following is a summary of the proposed project; the attached IS presents more details in Section 4, Project Description.

The following are key components of the proposed project:

- Construction of Lassen Substation, which would be built on parcels adjacent to the existing Mount Shasta Substation, located at 504 South Old Stage Road, Siskiyou County, California.
- Replacement of 36 transmission poles along a 1.5-mile segment of the existing 69 kilovolt (kV) power transmission system with wood-framed poles to comply with current California regulations. The system would initially operate at 69 kV, but would be built to allow future operation at 115 kV.
- Connection of the existing transmission lines to the proposed substation. Connection of the new Lassen Substation to the existing distribution system.
- Construct one new distribution line and reconductor two existing distribution lines, which would include the partial reconductoring of the existing 4.16 kV distribution system to 12.5 kV, and the undergrounding of approximately 1,200 feet of the existing overhead distribution line.
- Addition of three banks of 12.5 kV to 4.16 kV stepdown transformers to be added on the 12.5 kV distribution feeders near the existing 4.16 kV load.
- Removal of the existing above-ground Mount Shasta Substation facilities. The site's fence would remain as well as the gravel base and it will continue to be utilized for material storage on a temporary basis as future project needs require.

Project construction is expected to require approximately 12 months to complete.

PROJECT OBJECTIVE

The primary objectives of the proposed project are as follows:

- Ensure that all equipment and structures comply with current company, state, and federal standards, including the replacement of aging and non-standard equipment and the removal of sulfur hexafluoride (SF₆) distribution breakers.
- Ensure a reliable ongoing electricity supply to the area currently served by the Mount Shasta Substation.
- Facilitate regional bulk transmission voltage stability and improve bulk power transfer across the region.

MITIGATION MEASURES AND APPLICANT PROPOSED MEASURES

The PEA details project protocols that would be followed during project-related activities (PacifiCorp 2015). Project protocols are specific to environmental issue areas and are herein termed “APMs.” Table 1 lists APMs proposed as project design features. These APMs are analyzed as part of the proposed project.

Table 1
Applicant Proposed Measures

| APM Number | Description |
|--------------------|--|
| <i>Air Quality</i> | |
| APM-AQ-1 | <p>Construction Pollutant Reduction Measures:</p> <p>Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:</p> <ul style="list-style-type: none"> • Minimize soil disturbance. • Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site. • Curtail earthmoving activities on windy days. • Ensure that the engines of all construction equipment are properly tuned. • Limit the maximum speed to 15 miles per hour on unpaved surfaces. • Replant vegetation in disturbed areas as quickly as possible. • Implement other effective particulate matter control measures, as needed. <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> • Use California Air Resources Board-certified construction equipment, where available. • Use alternative fuel types for construction equipment where feasible. • Use local building materials. • Limit construction vehicle idling time. <p><u>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</u></p> <ul style="list-style-type: none"> • <u>Use California Air Resources Board-certified construction equipment, where available.</u> • <u>Use alternative fuel types for construction equipment where feasible.</u> • <u>Use local building materials.</u> • <u>Limit construction vehicle idling time.</u> |

Table 1
Applicant Proposed Measures

| APM Number | Description |
|-----------------------------|--|
| <i>Biological Resources</i> | |
| APM-BIO-1 | <p>Focused pre-construction surveys for special-status plant species shall be conducted in appropriate habitat and at the time of year when species are both evident and identifiable (typically when the species is flowering or fruiting), according to U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) protocols for species having a specified protocol, or according to standard, scientifically accepted systematic surveys appropriate for each species. Surveys will<u>shall</u> be conducted in areas of planned ground disturbance <u>prior to such disturbance occurring</u>. If special-status plant species are located during focused surveys within the project footprint area, avoidance of these plants shall be the first priority and can include such measures as modifications in the placement of transmission poles, access and spur roads, and of various marshalling and staging areas in accordance with the final project design and needs.</p> <p>If avoidance is not possible, relocation efforts, including topsoil salvage and relocation, if necessary, will be implemented. If PacifiCorp proposes any changes to the current construction plan or pole replacement sites after focused surveys for special-status species are conducted, additional field surveys shall be required prior to construction activities.</p> <p>Pre-construction biological clearance surveys shall be conducted to avoid or minimize potential impacts to special-status wildlife species. <u>This includes surveys for bat species, which shall be conducted by a qualified bat biologist and shall include focused searches for daytime and maternal roost sites appropriate for the bat species most likely to be roosting within the project right-of-way. If active bat roosts are discovered during pre-construction surveys, the qualified bat biologist shall coordinate with CDFW on appropriate avoidance/minimization measures, including the type and timing of such measures, to be implemented. If active special-status mammal burrows are located during surveys, avoidance measures shall be incorporated and the Environmental Monitor shall proceed as described in APM-BIO-6. Any special-status plant or wildlife species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.</u></p> |
| APM-BIO-2 | <p>Prior to first use, the undercarriages, wheels, and bodies of construction and operations equipment previously used outside of the project area shall be thoroughly washed in maintenance yards by high-pressure jets to eliminate any soil buildup that may contain invertebrates, such as insects and insect eggs, or the seeds of exotic plant species.</p> |
| APM-BIO-3 | <p>Every reasonable effort shall be made to minimize temporary and permanent removal of native vegetation at work areas. If required, native vegetation shall be flagged for avoidance. If native vegetation cannot be avoided, it will be crushed <u>or cut</u> rather than bladed <u>or rooted out</u>. A project revegetation plan shall be prepared for areas of native vegetation temporarily affected by project construction activities. <u>The revegetation plan shall be prepared by a qualified botanist or revegetation specialist and submitted to the California Department of Fish and Wildlife for review prior to any construction or ground disturbance of the area that will be temporarily impacted. The plan shall include, at a minimum, a discussion of the following: qualifications and experience of individuals performing the revegetation; methods (including soil preparation, seeding, planting, irrigating) to be used to revegetate the impacted area; monitoring methods and data to be collected on the revegetated area; success criteria; steps to be taken if the revegetation is not successful; and adaptive management to be implemented.</u></p> |
| APM-BIO-4 | <p>Construction crews shall avoid affecting the streambeds and banks of any streams along the route, to the extent feasible. If necessary, a Lake and Streambed Alteration Agreement (LSAA) will be secured from the CDFW<u>prepared and submitted to the California Department of Fish and Wildlife for review and approval prior to construction in the affected area</u>. Impacts will<u>shall</u> be mitigated based on the terms of the LSAA. No streams with flowing waters or those capable of supporting special-status species would be expected to have permanent adverse impacts from project implementation.</p> |
| APM-BIO-5 | <p>To avoid impacts from temporary access to wetland areas, existing access roads and temporary access methods (e.g., high density polyethylene (HDPE) driving mats, portable road platforms) shall be used to access pole replacement sites. Results of the wetland delineation (Appendix D of the Proponent's Environmental Assessment) shall be incorporated into vehicle access routes, which shall be designed to avoid</p> |

Table 1
Applicant Proposed Measures

| APM Number | Description |
|------------|--|
| | and minimize wetland disturbance. <u>Access to pole extraction and placement locations that will occur within wetland areas, particularly those north of the existing substation that are more prone to water inundation during wet years, will be conducted when conditions are dry and ground saturation would not pose an issue for vehicle access.</u> |
| APM-BIO-6 | Environmental Monitors shall be assigned to the project, and will be responsible for ensuring that impacts to special-status species, native vegetation, <u>wetlands</u> , wildlife habitat, and unique resources are avoided to the fullest extent possible. The monitor shall delineate and mark for avoidance in the field all known sensitive resource locations and, where appropriate, use flagging to delineate boundaries of areas from where activities are restricted to protect <u>wetlands</u> , native plants and wildlife, or special-status species. If the monitor determines that project activities may adversely affect the species, the monitor shall <u>have authority to halt construction activities until the monitor can consult with the U.S. Fish and Wildlife Service USFWS and/or California Department of Fish and Wildlife CDFW</u> regarding appropriate avoidance measures. These restricted areas shall be monitored during construction to ensure their protection. |
| APM-BIO-7 | PacifiCorp shall conduct all pole installation, conductor installation, tree trimming, tree removal, grading, and clearing of vegetation from September 1 to February 28, outside of the nesting season. The March 1–August 31 nesting season dates are guidelines: nesting season may begin earlier or end later depending on weather conditions; nests will be protected regardless of the calendar date. If construction cannot be completed outside of the nesting season, pre-construction surveys within the project area will be conducted by a qualified biologist for nests prior to ground disturbance, tree trimming, or other construction activities. The nesting bird clearance survey will be conducted within 3 days prior to construction activities. For passerines, a 50-foot buffer will be installed around the nest and maintained around the nest until the young have fledged. A larger buffer may be required if nesting birds appear stressed. Nesting raptors require a larger buffer area than passerines. If a raptor nest is observed, a 300-foot buffer will be installed. If a nesting raptor is observed within 300 feet of the project area prior to the start of construction, a qualified biologist will determine whether or not construction activities could potentially disturb nesting raptors and implement appropriate measures (e.g., on-site monitor, timing restriction) to adequately protect nesting raptors. <u>Any special-status bird species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.</u> |
| APM-BIO-8 | A Worker Environmental Awareness Program (WEAP) shall be prepared and all construction crews and contractors shall be required to participate in WEAP training prior to starting work on the project. The WEAP training shall include a review of the special-status species and other sensitive resources that could occur in the project area, the locations of any existing sensitive resources, their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. A record of all personnel trained shall be maintained. |
| APM-BIO-9 | Migratory bird flight paths in the project area are currently unknown. An impact assessment study and bird observation surveys shall be conducted according to the Avian Power Line Interaction Committee's (APLIC 1994) survey protocol. The surveys shall be conducted in wetlands along both sides of the existing transmission line within the study area. The surveys shall be done in consultation with <u>the California Department of Fish and Wildlife, CDFW</u> . Results of the bird observation surveys will determine potentially impacted species and locations to mark wires to increase their visibility to flying birds. Line markers should be designed to be raptor-safe in accordance with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2012 (APLIC 2012), evaluated and approved by PacifiCorp engineers prior to implementation. |
| APM-BIO-10 | Vehicles shall be restricted to previously established roadways and access routes. |
| APM-BIO-11 | Trash, dumping, firearms, open fires, hunting, and pets shall be prohibited in the project area. |
| APM-BIO-12 | If construction within and near potential willow flycatcher (<i>Empidonax traillii</i>) habitat (riparian scrub and surrounding wet meadow) cannot be completed outside of the willow flycatcher nesting season (June 1 <u>through to</u> August 31), broadcast surveys shall be conducted to determine presence/absence of the species prior to construction activities. If absence is determined, construction may begin within the potential willow |

Table 1
Applicant Proposed Measures

| APM Number | Description |
|---------------------------------|--|
| | flycatcher habitat. If presence is determined, flycatcher detections nests will shall be buffered by 150-500 feet, or as otherwise determined in consultation with the California Department of Fish and Wildlife, and construction activities will shall not occur within the buffer area for the remainder of the nesting season. <u>Any willow flycatcher observed during surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.</u> |
| APM-BIO-13 | Operation and maintenance activities that must occur in or near potential willow flycatcher habitat (riparian scrub and surrounding wet meadow) will shall be conducted outside of the willow flycatcher nesting season (June 1 through to August 31), whenever practicable. <u>If project construction occurs within habitat occupied by nesting willow flycatcher, because the species is state listed as endangered, a state Incidental Take Permit would be required.</u> |
| <i>Geology and Soils</i> | |
| APM-GEO-1 | The project will be designed and constructed in accordance with recommendations included in the project-specific geotechnical investigation: site grading, excavation and utility trenches, foundations, mitigation of soil corrosivity on concrete, seismic design criteria, and unpaved site access road. |
| <i>Greenhouse Gas Emissions</i> | |
| APM-AQ-1 | <p>Construction Pollutant Reduction Measures:</p> <p>Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:</p> <ul style="list-style-type: none"> • Minimize soil disturbance. • Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site. • Curtail earthmoving activities on windy days. • Ensure that the engines of all construction equipment are properly tuned. • Limit the maximum speed to 15 miles per hour on unpaved surfaces. • Replant vegetation in disturbed areas as quickly as possible. • Implement other effective particulate matter control measures, as needed. <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> • Use California Air Resources Board-certified construction equipment, where available. • Use alternative fuel types for construction equipment where feasible. • Use local building materials. • Limit construction vehicle idling time. <p><u>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</u></p> <ul style="list-style-type: none"> • <u>Use California Air Resources Board-certified construction equipment, where available.</u> • <u>Use alternative fuel types for construction equipment where feasible.</u> • <u>Use local building materials.</u> • <u>Limit construction vehicle idling time.</u> |

Table 1
Applicant Proposed Measures

| APM Number | Description |
|--|---|
| <i>Hazards and Hazardous Materials</i> | |
| APM-HAZ-1 | <p>Health and Safety Plan. A <u>health and safety plan</u> Health and Safety Plan shall be prepared and made available once a contractor is procured for the construction of the proposed project. The plan should include, and not be limited to, information on the appropriate personal protective equipment to be used during construction. All transport of hazardous materials would be in compliance with applicable laws, rules and regulations, including the acquisition of required shipping papers, package marking, labeling, transport vehicle placarding, training, and registrations.</p> |
| APM-HAZ-2 | <p>Hazardous Substance Control and Emergency Response Plan. PacifiCorp shall prepare and implement a Hazardous Substance Control and Emergency Response Plan as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of project construction through operation. The plan would include, but not be limited to, worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they would be managed in accordance with all applicable regulations. Material safety data sheets would be maintained and kept available on site, as applicable.</p> <p>All hazardous materials and hazardous wastes would be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Proper disposal of potentially contaminated soils. • Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. • Emergency response and reporting procedures to address hazardous material spills. • Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit. <p>PacifiCorp will complete its Emergency Action Plan Form as part of project tailboard meetings. The purpose of the form is to gather emergency contact numbers, first aid location, work site location, and tailboard information.</p> |
| APM-HAZ-3 | <p>Spill Prevention, Countermeasure, and Control (SPCC) Plan. An SPCC plan shall be prepared and certified by a professional engineer; a complete copy would be maintained on site. The SPCC plan would include engineered and operational methods for preventing, containing, and controlling potential releases and provisions for a quick and safe cleanup.</p> |
| <i>Hydrology and Water Quality</i> | |
| APM-WQ-1 | <p>Stormwater Pollution Prevention Plan (SWPPP) or Erosion Control Plan Development and Implementation. An erosion and sediment control plan would be developed prior to construction and included as part of the required SWPPP. The goal of the SWPPP will be to remove sediment and wastes from runoff before the runoff is discharged from the project site. This would be accomplished by:</p> <ul style="list-style-type: none"> • Minimizing the acreage of disturbed and exposed soil during the construction phase and implementing stabilization measures where necessary. • Removing sediment from runoff before it leaves the site. • Complying with specific erosion and sediment control measures specified within the erosion and sediment control plan. <p>Methods may include preservation of existing vegetation or use of geomats, straw wattles, straw bale barriers, or silt fencing, which would be placed at construction boundaries. Gravel ramps may be installed at access points to public roadways to prevent or minimize the tracking of mud, dirt, sediment, or similar materials onto</p> |

Table 1
Applicant Proposed Measures

| APM Number | Description |
|-----------------------------------|--|
| | <p>the roadway. Selection of appropriate erosion control materials will be based on soil properties, steepness of the slope, and anticipated surface flow or runoff.</p> <p>Diesel fuel, gasoline, oil, and other lubricants, as well as adhesives and sealants, would be utilized during the construction of the transmission line and substation. Bulk quantities may be stored in the designated construction yard/staging area. Vehicle fueling and maintenance activities would be restricted to staging areas or approved areas away from drainage channels and sensitive habitats. All construction vehicles would be monitored for leaks and receive regular off-site preventive maintenance to reduce the chance of leakage.</p> <p>A copy of the SWPPP and of Receipt of the Letter of Intent, including the project's Waste Discharge ID Number, will be provided to the California Public Utilities Commission prior to construction to certify compliance with Order 2009-0009-DWQ Construction General Permit. The SWPPP will be updated during construction as required by the State Water Resources Control Board.</p> |
| APM-WQ-2 | Restoration. To reduce visual contrast and siltation in construction where ground disturbance is substantial, surface preparation and reseeding shall occur during the last phase of construction. The method of restoration would normally consist of loosening the soil surface, reseeding, installing cross drains for erosion control, placing water bars in the road, and filling ditches. These actions shall occur in areas of exposed soils large enough that, if they remain unremediated once construction is completed, they could exceed water quality objectives of receiving waters (e.g., for sediment, turbidity, temperature, and dissolved oxygen) set forth in the Water Quality Control Plan for the Sacramento and San Joaquin River Basins. |
| APM-WQ-3 | Pole Placement Minimization/Avoidance. To minimize the amount of sensitive features disturbed in designated areas, poles would be placed so as to avoid sensitive features and/or to allow conductors to clearly span the features, within limits of standard pole design. If the sensitive features cannot be completely avoided, poles would be placed so as to minimize the disturbance. |
| <i>Transportation and Traffic</i> | |
| APM-TT-1 | <p>Traffic Management Plan. Prior to the start of construction, PacifiCorp shall prepare a Traffic Management Plan. The Plan would define the use of flag persons, warning signs, lights, barricades, cones, etc. to control construction traffic. The Plan would include but not be limited to the following:</p> <ul style="list-style-type: none"> • All property owners and residents of streets affected by construction shall be notified prior to the start of construction. Advance public notification shall include postings of notices and appropriate signage of construction activity. Access to all residences and properties near the project shall be maintained at all times. • All construction activities shall be coordinated with local law enforcement and fire protection agencies. Emergency service providers shall be notified of the timing, location, and duration of construction activities. • Road use-related wear and tear shall be documented during construction of transmission line facilities and PacifiCorp shall repair any damaged roadway sections, as applicable. |

Sources: PacifiCorp 2015, 2016a.

MITIGATION MEASURES

The following mitigation measures (Table 2), agreed to by the applicant Applicant, would reduce project-related impacts to a less than significant level.

Table 2
Mitigation Measures

| MM Number | Description |
|--|---|
| <i>Biological Resources</i> | |
| MM-BIO-1 | A topsoil salvage and relocation plan shall be prepared that includes the following information: (1) a description of the methods to be utilized with any topsoil salvage or plant relocation, (2) a description of the receiving location for salvaged topsoil or relocated plants, (3) a discussion of the criteria and measures to be used to determine success of relocated plants, (4) monitoring to be implemented to measure the success of plant relocation, and (5) adaptive management to be used in association with any plant relocation. Any topsoil salvage and/or plant relocation plans shall be reviewed and approved by the <u>CDFW California Department of Fish and Wildlife</u> . |
| <i>Hazards and Hazardous Materials</i> | |
| MM-HAZ-1 | Prior to demolition of the Mount Shasta Substation and/or the on-site residences, a lead-based paint and asbestos survey shall be conducted by a California Occupational Safety and Health Administration-certified asbestos consultant and/or certified site surveillance technician and a California Department of Public Health-certified lead inspector/risk assessor or sampling technician. The existing Mount Shasta Substation shall also be surveyed for the presence of polychlorinated biphenyls (PCBs), mercury, and other contaminants of concern prior to site demolition activities. A report documenting material types, conditions, and general quantities will be provided, along with photos of positive materials and diagrams. Demolition or renovation plans and contract specifications shall incorporate any abatement procedures for the removal of material containing PCBs, mercury, asbestos, or lead-based paint, including the appropriate soil management protocol and disposition. All abatement work shall be done in accordance with federal, state, and local regulations. |
| MM-HAZ-2 | <p>Develop and Implement a Lassen Substation Project Fire Plan. PacifiCorp shall develop a Lassen Substation Project Fire Plan in consultation with Mount Shasta Fire Department, the Mount Shasta Fire Protection District, and the California Department of Forestry and Fire Protection. PacifiCorp shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the consulted agencies prior to the initiation of construction activities and shall be implemented during all construction activities by PacifiCorp. At minimum, the plan will include the following:</p> <ul style="list-style-type: none"> • Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions • Proper use of construction equipment • Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days • Fire coordinator and fire patrol roles and responsibilities • Emergency fire suppression equipment/tools, including size and documentation of response time capabilities • Worker training for fire prevention, initial attack firefighting, and fire reporting • Emergency communication, response, and reporting procedures • Coordination with local fire agencies to facilitate agency access through the project site • Emergency contact information • Worker education materials, tailgate meetings • Compliance with applicable wildland fire management plans and policies established by state and local agencies • Other information as provided by responsible and consulted agencies |
| <i>Hydrology and Water Quality</i> | |
| MM-WQ-1 | If necessary, Proper Management of Dewatering Discharges. Prior to excavation of foundations or horizontal directional drilling pits, or other activity requiring groundwater dewatering, PacifiCorp shall submit a Notice of Intent to the Central Valley Regional Water Quality Control Board (CVRWQCB) for the General Order for Dewatering and Other Low-Threat Discharges to Surface Waters (CVRWQCB Order R5-2013-0074, as amended). PacifiCorp shall describe the activity with sufficient detail to demonstrate the nature, location, and |

Table 2
Mitigation Measures

| MM Number | Description |
|-----------|---|
| | duration of the discharge. PacifiCorp shall send a sample of the groundwater to be discharged to a certified laboratory for analysis of priority pollutants, found in Attachment B of the General Order. If screening levels are exceeded, PacifiCorp shall implement appropriate treatment of the groundwater prior to discharge off site. Dewatering discharges shall comply with the discharge prohibitions, effluent limitations, and receiving water limitations outlined in CVRWQCB Order R5-2013-0074, and in no case shall the discharge impair beneficial uses, violate water quality standards, or cause a possible nuisance condition. |

ENVIRONMENTAL DETERMINATION

The IS has been prepared to identify the potential effects on the environment from implementation of the proposed project and to evaluate the significance of these effects. The IS is based on the applicant's Applicant's PEA filed on November 2, 2015, and amended PEA filed on July 15, 2016; proposed project site inspections by the CPUC environmental team; and other environmental analysis for the proposed project. APMs proposed by the applicant Applicant as project design features are incorporated into Section 4, Project Description, of this IS.

Based on the IS, the proposed project, with integration of APMs and mitigation measures where applicable, would result in less than significant effects or have no impacts in the areas of aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, recreation, transportation and traffic, and utilities and service systems.

REVIEW PERIOD

All comments regarding the correctness, completeness, or adequacy of this IS/MND must be received by the CPUC by no later than 5:00 p.m. on December 23, 2016.

The IS/MND, as well as PacifiCorp's application and PEA for the Lassen Substation Project (December 2016), are available at the project's website:

<http://www.cpuc.ca.gov/environment/info/dudek/LassenSub/PacifiCorpLassenSub.htm>

Contact Person



Michael Rosauer, Project Manager
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102
415.703.3175

11/17/16

Date

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

1 INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

1.1 Project Title

PacifiCorp – Lassen Substation Project

1.2 Lead Agency Name and Address

California Public Utilities Commission (CPUC)
Energy Division
505 Van Ness Avenue
San Francisco, California 94102

1.3 Contact Person and Phone Number

Michael Rosauer, Project Manager
Energy Division
415.703.5484

1.4 Project Location

The proposed Lassen Substation Project (project) is located in the City of Mount Shasta (City) and in unincorporated Siskiyou County (County). The new Lassen Substation would be located on two parcels (APN 036-220-280 and APN 036-220-170) adjacent to the existing Mount Shasta Substation on South Old Stage Coach Road, approximately 0.67 miles to the southwest of the City, and about 900 feet west of Interstate 5 (I-5) in unincorporated Siskiyou County. Transmission and distribution line upgrades, including pole replacements, would take place predominantly in existing rights-of-way on the western side of I-5. Distribution lines would extend into the City of Mount Shasta under the I-5 to Jessie Street, along Kingston Road, and along private roads through Eskaton Washington Manor. In addition, pole-top stepdown transformers and distribution lines would be installed on existing poles on Chestnut Street and Mill Street to connect the new 12.47-kilovolt (kV) lines to the existing 4.16 kV distribution system in the City.

1.5 Project Sponsor's Name and Address

PacifiCorp
825 Northeast Multnomah, Suite 940
Portland, Oregon 97232
503.813.6539
415.276.6500

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

1.6 General Plan Designation

According to Siskiyou County, the General Plan Land Use Element does not contain mapping for specific land use designations. Instead the County uses overlay maps to identify development constraint areas. According to the Land Use Element of the General Plan, the proposed project would be within the following mapped resource overlay areas: Wildlife Hazard, Woodland Productivity, Erosion Hazard, Prime Agricultural Soils, and Water Quality.

Elements of the project within the City of Mount Shasta traverse areas classified as CC (Commercial Center), RR (Low-Density Residential and Rural Residential), EC (Employment Center), and RL (Resource Land).

1.7 Zoning

According to Siskiyou County the proposed substation location is zoned as Rural Residential (R-R). Remaining element of the project would cross with Multiple-Family Residential (RES-4), Neighborhood Commercial (C-U), Rural Residential Agricultural (R-R), Non-Prime Agricultural (AG-2), and Planned Development (P-D) zoning designations. Elements of the project within the City of Mount Shasta are zoned U (Unclassified).

1.8 Description of Project

The application and accompanying Proponent's Environmental Assessment (PEA) identifies the proposed project, which consists of the demolition of the existing Mount Shasta Substation, construction of the new Lassen Substation, upgrades to the 69 kV Line 2 transmission line, installation of a new 12.47 kV distribution line, and the upgrades of two existing 4.12 kV distribution lines to 12.47 kV.

For further discussion, see Section 4, Project Description.

1.9 Surrounding Land Uses and Setting

The project area is located near the City of Mount Shasta, in Siskiyou County. The area is bounded by Mount Shasta to the northeast, Mount Eddy and the coastal ranges to the west, and Lake Siskiyou to the southwest.

All elements of the proposed project associated with the substation and the upgrade to the transmission lines occur within the County. Elements of the distribution line upgrade are split between Siskiyou County and the City of Mount Shasta.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The Lassen Substation would be located in a rural residential area to the southwest of the City. The proposed location for the substation is adjacent to the existing Mount Shasta Substation and would be constructed on two vacant residential properties currently consisting of vacant dwellings and associated outbuildings surrounded by coniferous and ornamental trees.

Transmission and distribution system upgrades would occur both within the City and in rural open space to the west and north of the City and in unincorporated Siskiyou County. Vegetation communities under the existing transmission lines and in the surrounding project area include non-native grassland, dry and wet montane meadows, fen, riparian scrub, and fragmented lower montane coniferous forest. The area is predominantly rural residential and montane coniferous forest, with the open space under the transmission lines having been heavily grazed by cattle.

A variety of land uses are found in the surrounding area. The substation and transmission line components are set in a rural residential area and traverse both woodland and open non-prime agricultural grazing land. The components within the City of Mount Shasta traverse commercial residential and light industrial areas of the City.

1.10 Other Public Agencies Whose Approval Is Required

In addition to the Authority to Construct required by the CPUC for overall project approval and California Environmental Quality Act review, Table 1-1 describes additional permits that the applicant will likely be required to obtain for project implementation.

Table 1-1
Required Permits and Approvals

| Permit/Approval | Accepting Authority/ Approving Agency | Statutory Reference |
|--|---|--|
| <i>Federal</i> | | |
| Clean Water Act 404 Preconstruction Notification | U.S. Army Corps of Engineers | Clean Water Act, Section 404; 33 CFR 320–330 |
| Permit to cross Federal-Aid Highway | Federal Highway Administration | 23 CFR 1.23 and 1.27; 23 CFR 645 Subpart B; 23 CFR 77 |
| <i>State of California</i> | | |
| Permit to Construct | CPUC | CEQA, Cal Pub. Res. Code Sec. 21000 et seq. and Public Utilities Code Section 1001 |
| Encroachment Permit | California Department of Transportation, District 2 - Redding | Section 671.5(a) of the California Streets and Highways Code |
| Streambed Alteration Program – Notification | California Department of Fish and Wildlife, Northern Region (1) | Fish and Game Code, Sections 1602 and 1603 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 1-1
Required Permits and Approvals

| Permit/Approval | Accepting Authority/ Approving Agency | Statutory Reference |
|--|--|--|
| Section 401 CWA Water Quality Certification | State Water Resources Control Board – California Water Quality Control Board for Central Valley, Region 5 (Redding Office) | Federal Clean Water Act, Section 401 |
| State Waste Discharge Requirements – obtained as part of the 401 Water Quality Certification | State Water Resources Control Board – California Water Quality Control Board for Central Valley, Region 5 (Redding Office) | Porter-Cologne Water Quality Control Act |
| General Discharge Permits for Storm Water Associated with Construction Activity | State Water Resources Control Board – S.M.A.R.T.S. Database | Federal Clean Water Act, Section 402 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality |
| <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

3 ENVIRONMENTAL DETERMINATION

On the basis of this initial evaluation:

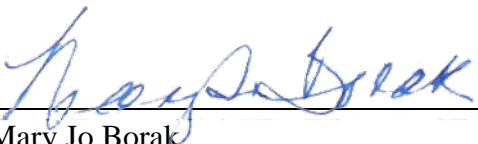
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION (ND) will be prepared. ☐

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. ☒

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT (EIR) is required. ☐

I find that the proposed project MAY have a “potentially significant impact” or “potentially significant impact unless mitigated” on the environment, but a least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An EIR is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or ND pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or ND, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐



Mary Jo Borak
Energy Division
California Public Utilities Commission

11.21.16
Date

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4 PROJECT DESCRIPTION

4.1 Introduction

On November 2, 2015, PacifiCorp (the applicant ~~Applicant~~) filed an application (A.15-11-005) that included a proponent's environmental assessment (PEA; PacifiCorp 2015) pursuant to Rules 2.4 and 2.5 of the California Public Utilities Commission's (CPUC) Rule of Practice and Procedure with the CPUC for a Permit to Construct for the Lassen Substation Project (proposed project).

The proposed project is located in the City of Mount Shasta (City) and in unincorporated Siskiyou County (Figure 4-1, Regional Location and Vicinity), and consists of a new 69 kilovolt (kV) to 12.47 kV substation to replace the existing Mount Shasta Substation, upgrades to the existing 69 kV transmission line that supplies the substation, and upgrades to the distribution system supplying the City of Mount Shasta.

4.2 Project Objectives

According to PacifiCorp, the primary objectives of the proposed project are as follows:

- Ensure that all equipment and structures comply with current company, state, and federal standards,¹ including the replacement of aging and non-standard equipment and the removal of sulfur hexafluoride (SF₆) distribution breakers.
- Ensure a reliable ongoing electricity supply to the area currently served by the Mount Shasta Substation.
- Facilitate regional bulk transmission voltage stability and improve bulk power transfer across the region.

The current Mount Shasta Substation was constructed in 1930 and is coming to the end of its serviceable life. The wooden support structure is deteriorating and much of the equipment is obsolete. During the most recent service, several components were custom made because they are no longer manufactured; this reduces long-term system reliability (PacifiCorp 2016a). Additionally, current distribution circuit breakers are a mix of vacuum interrupters and SF₆ breakers. SF₆ is a highly reactive greenhouse gas that is subject to regulation as part of greenhouse gas emission reduction targets (17 CCR 95350 et seq.), and PacifiCorp no longer uses SF₆ based breakers in their distribution systems. Finally, issues with the distribution lines require their replacement and relocation. When Interstate 5 (I-5) was constructed, the 4.16 kV

¹ PacifiCorp 2016a, DR 2.0 – Response 2.0 a.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

distribution lines that serve the City of Mount Shasta were routed under I-5 through California Department of Transportation (Caltrans) culverts. Running distribution lines in culverts is a non-standard routing method for which Caltrans granted an extension in 2000 with the condition that the lines be removed by 2005. Since then Caltrans and PacifiCorp have been developing a more permanent solution (PacifiCorp 2015).

The anticipated near-term load growth in the Mount Shasta service area is likely to use the remaining available capacity on the existing transmission lines, and exceed the capacity of existing transformers. Because other local substations, such as Weed Junction and North Dunsmuir, are too distant, being 10 miles and 6 miles away respectively, upgrading the line and transformers serving the Mount Shasta service area is necessary to maintain reliable service.

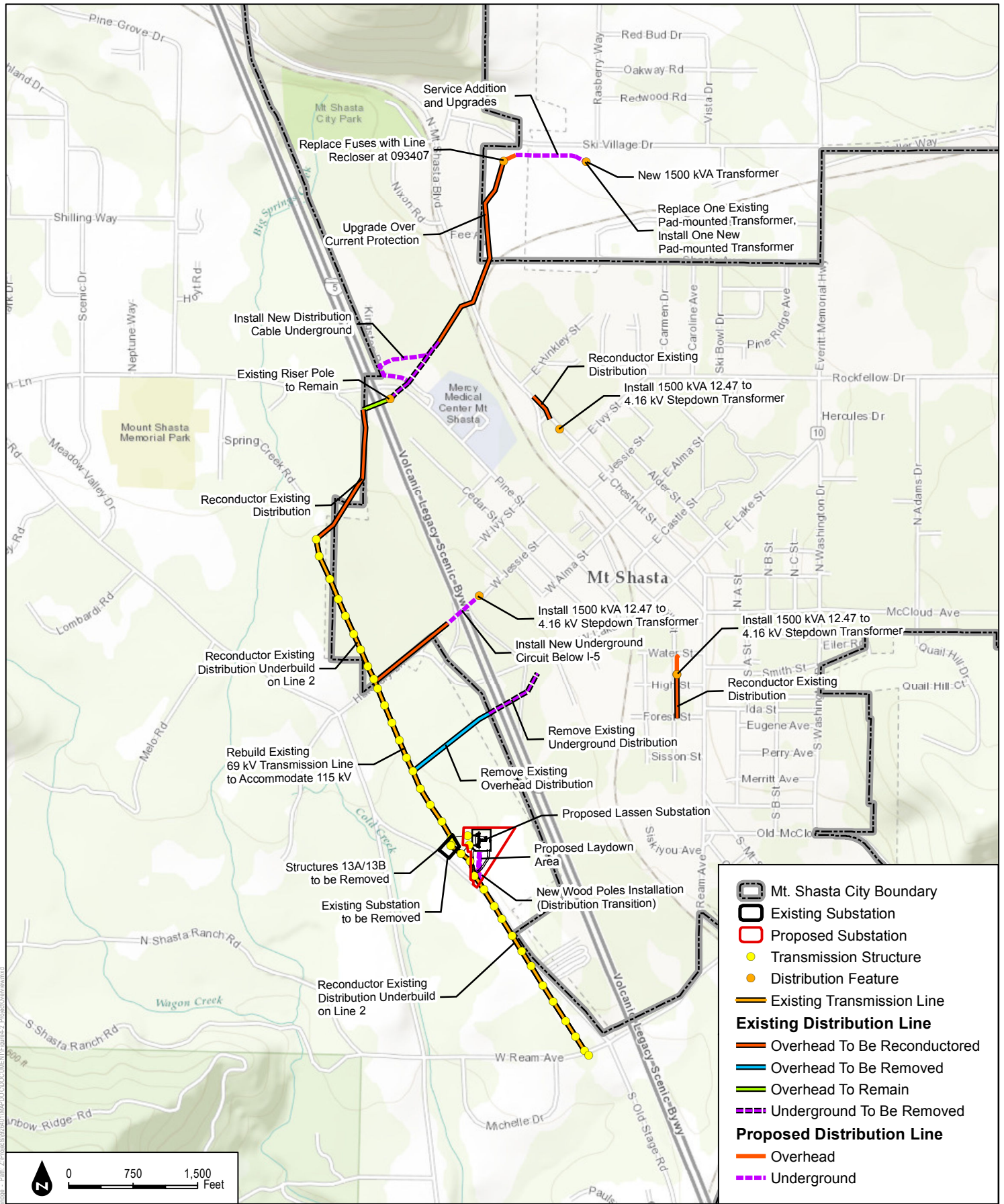
The current bulk power transmission system in northern California is constrained by the voltage stability regulation. To facilitate stability and bulk power transfer across the regional system, PacifiCorp plans to remove local service areas from the regional bulk transmission system. To help achieve this, PacifiCorp needs to provide a second 115 kV line to the North Dunsmuir Substation. Consequently, PacifiCorp proposes to construct the project with the capability of running at 115 kV, although it would initially run at 69 kV. This would continue to allow PacifiCorp to use Line 14 (the other 115 kV transmission line in the region) as a dedicated Western Electricity Coordinating Council (WECC) transmission path to carry scheduled power flow.

4.3 Project Location

The proposed project is located in the City of Mount Shasta and in unincorporated Siskiyou County (Figure 4-1). The new Lassen Substation would be located on two parcels (APN 036-220-280 and APN 036-220-170) adjacent to the existing Mount Shasta Substation on South Old Stage Road, approximately 0.67 miles to the southwest of the City, and about 900 feet west of I-5 (Figure 4-2, Project Component Overview) in unincorporated Siskiyou County. Transmission and distribution line upgrades, including pole replacements, would take place predominantly in existing rights-of-way on the western side of I-5, as shown in Figure 4-3, Lassen Substation and Transmission Components, and Figure 4-4, Distribution System Components.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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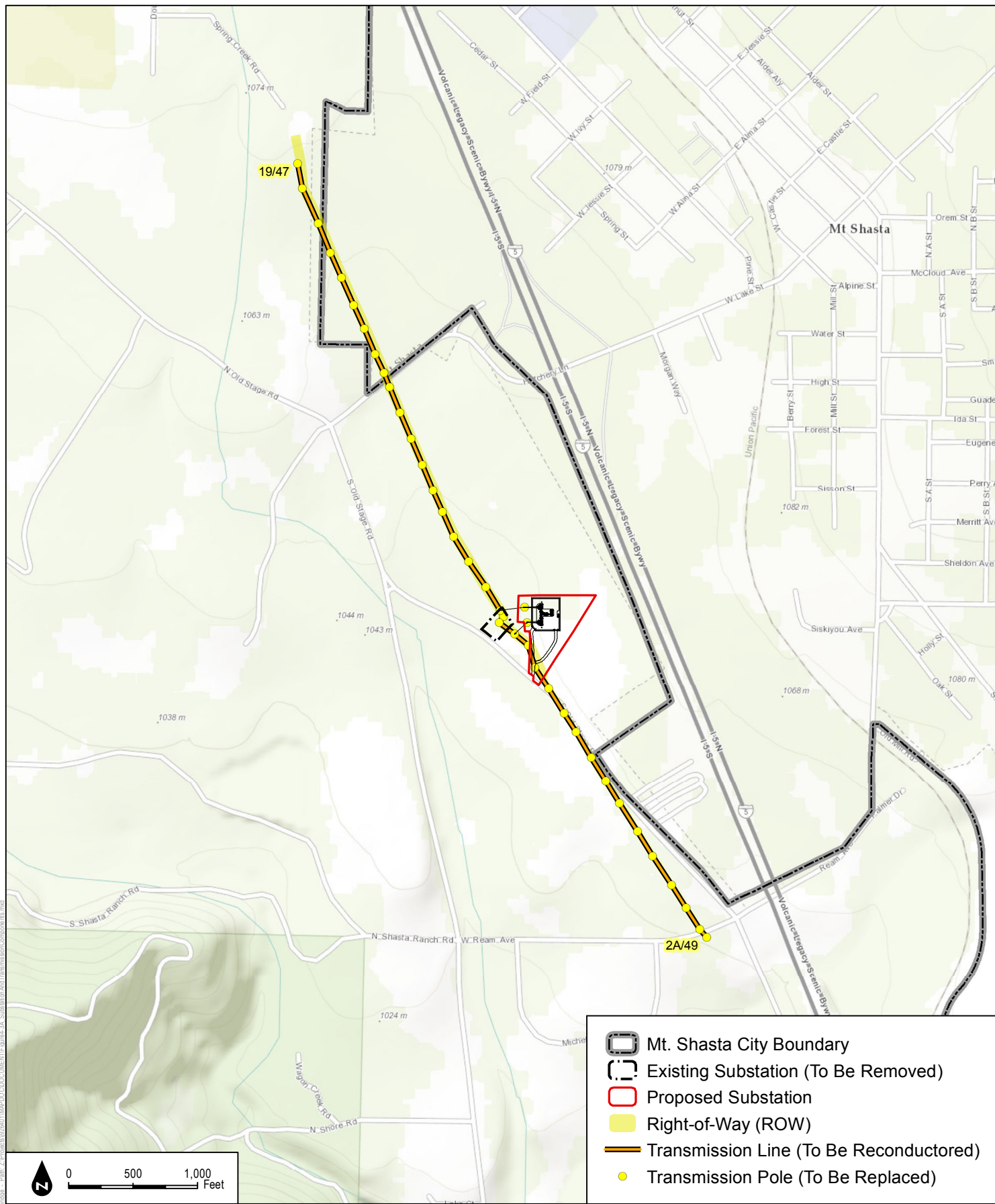


SOURCE: ESRI Basemaps (2016); PacifiCorp (2015)

FIGURE 4-2
Project Component Overview

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SOURCE: ESRI Basemaps (2016); PacifiCorp (2015)

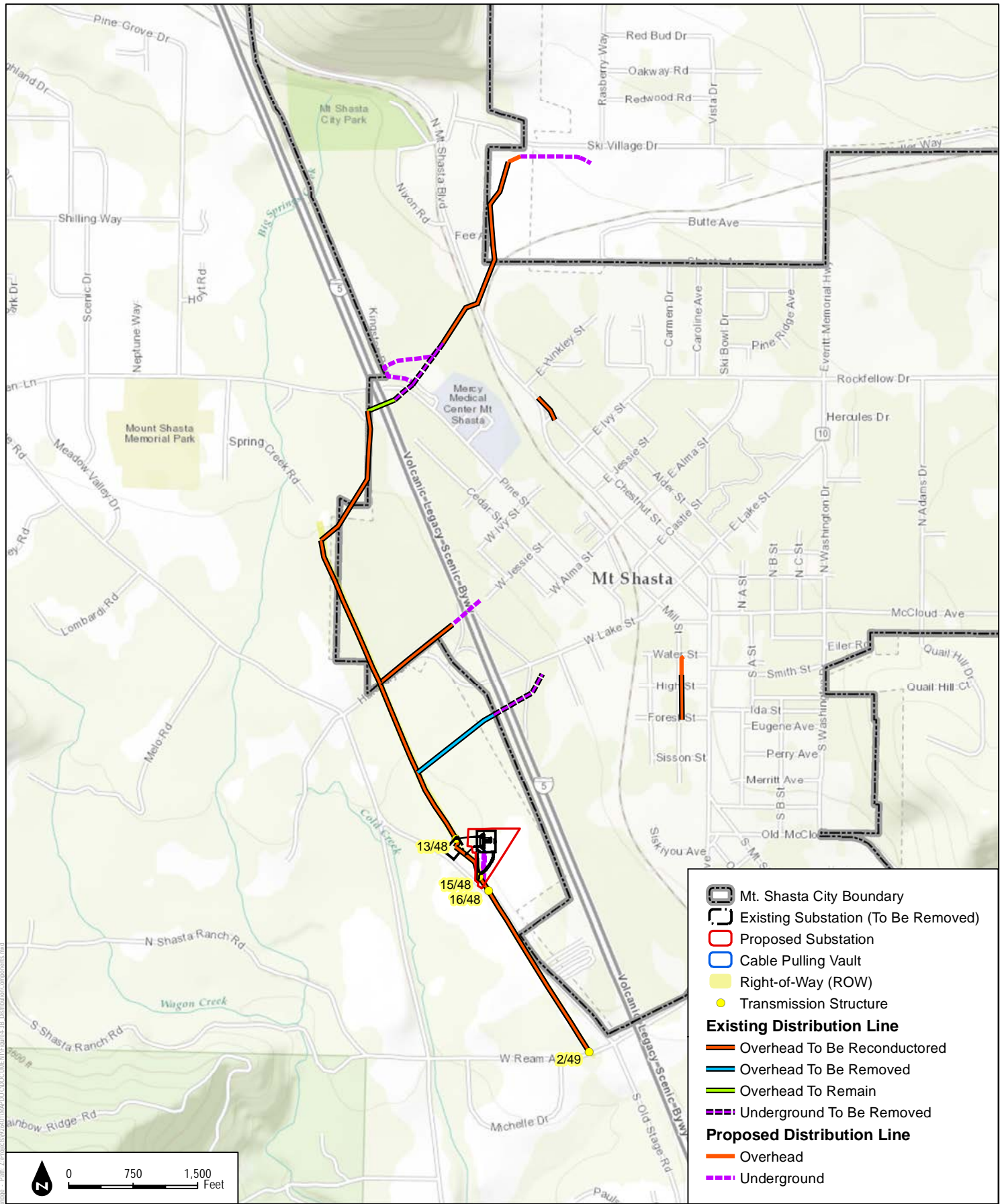
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Lassen Substation Project

FIGURE 4-3
Lassen Substation and Transmission Components

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SOURCE: ESRI Basemaps (2016); PacifiCorp (2015)

Lassen Substation Project

FIGURE 4-4
Distribution System Components

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Setting and Surroundings

The project area is located near the City of Mount Shasta, in Siskiyou County. The area is bounded by Mount Shasta to the northeast, Mount Eddy and the coastal ranges to the west, and Lake Siskiyou to the southwest.

The Lassen Substation would be located in a rural residential area to the southwest of the City. The proposed location for the substation is adjacent to the existing Mount Shasta Substation. The proposed project ~~and~~ would be constructed on two vacant residential properties that currently consisting of vacant dwellings and associated outbuildings surrounded by coniferous and ornamental trees.

Transmission and distribution system upgrades would occur both within the City and in rural open space to the west and north of the City and in unincorporated Siskiyou County. Vegetation communities under the existing transmission lines and in the surrounding project area include non-native grassland, dry and wet montane meadows, fen, riparian scrub, and fragmented lower montane coniferous forest. The area is predominantly rural residential and montane coniferous forest, with the open space under the transmission lines having been heavily grazed by cattle.

4.4 Project Elements

Existing transformers in the Mount Shasta Substation would be replaced with 12.47 kV transformers in the new Lassen Substation, which in turn would require the existing 4.16 kV distribution lines that currently supply the City to be upgraded to 12.47 kV distribution lines. To accommodate the additional weight of the new distribution lines and maintain compliance with Title 8 of the California Code of Regulations and CPUC General Order 95, 36 wooden poles along the existing 69 kV transmission line running to the northwest and southeast of the proposed substation would be replaced and the existing 69 kV transmission line would be transferred to the new poles (Figure 4-3).

Three new 12.47 kV distribution lines would be installed to supply the City in three locations. Two existing lines, Pioneer Feeder and Black Butte Feeder, would be underbuilt on Line 2 to Ream Avenue and West Lake Street, respectively. In addition, a new distribution line would also be installed and built under the rebuilt Line 2 running northwest from the substation, before using existing distribution rights-of-way to supply industrial facilities on Ski Village Drive. (Figure 4-4).

The upgrade to 12.47 kV would require three new 12.47 to 4.16 kV stepdown transformers to be installed in the City of Mount Shasta on Chestnut Street between East Ivey Street and East Field Street, on Mill Street between Forest Street and Water Street, and at the bottling plant on Ski Village Drive.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4.4.1 Substation

The proposed Lassen Substation would be constructed on two parcels adjacent to the existing Mount Shasta Substation on South Old Stage Road. Existing buildings and trees would be cleared prior to grading (Figure 4-5, Substation Plan View). The substation would then be built on a graded gravel pad measuring approximately 215 feet by 250 feet.

Below-grade components would include the grounding grid and drainage system, electrical conduits, and the distribution line vault. Reinforced concrete foundations would be installed to support heavier components, including the steel structures, transformers, and switching gear. The remaining pad would be filled, and graded with gravel. Grading groundwork and foundation installation would require the removal of up to 65,500 cubic feet of fill material from the site.

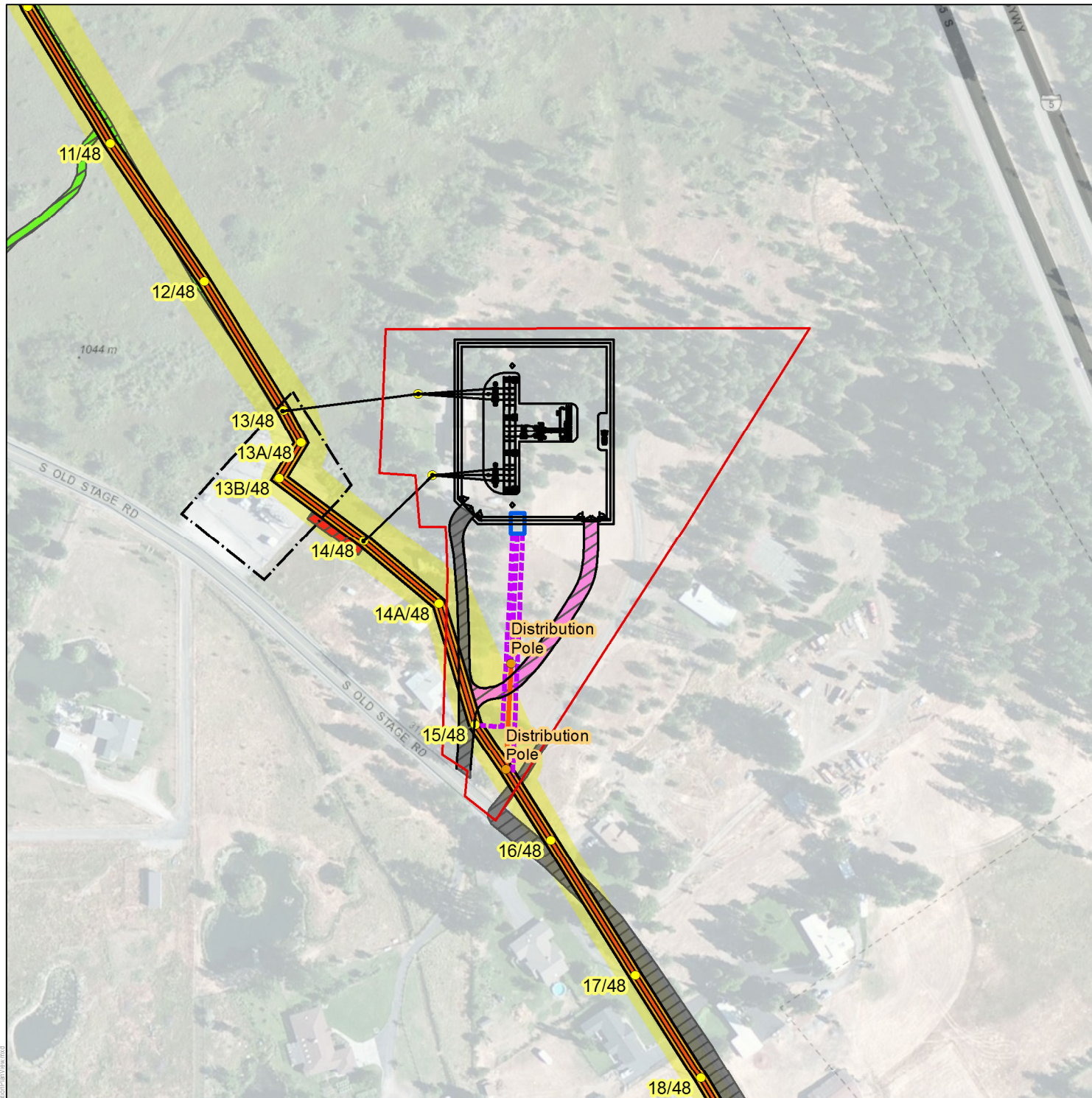
Aboveground structures would consist of control and relay houses, transformers (single 69/12.47 kV 15/20/25 megavolt amperes (MVA)), switchgear, and tubular steel supporting structures that would be in the configuration shown on Figure 4-5. Structures in the substation would be up to 40 feet in height, excluding transmission and distribution poles (Figure 4-6, Lassen Substation Plan and Elevation Views).

Fencing, Access Control, and Lighting

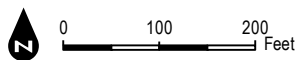
Perimeter security fencing would be installed around the substation yard and would consist of a 7-foot-tall chain-link security fence, strung with 1 foot of barbed wire on top. Ingress and egress would be through 20- to 24-foot-wide double chain-link gates, similar in construction to the surrounding chain-link fence.

Roadways Access

The existing residential driveway would be upgraded to gravel and an additional road would be constructed to provide a 20- to 24-foot-wide fire truck access loop through the substation that would connect back to the South Old Stage Road at the current access point to the parcel (Figure 4-5).



- | | |
|---------------------------------------|---|
| Existing Substation (To Be Removed) | Transmission Structure (To Be Replaced) |
| Proposed Substation | New Distribution Pole |
| Cable Pulling Vault | Existing Transmission Line (To Be Upgraded) |
| Right-of-Way (ROW) | Existing Distribution Line |
| Access Road | Overhead To Be Reconstructed |
| Existing Access Route | Proposed Distribution Line |
| New Access Road | Overhead |
| Temporary Access Route | Underground |
| Environmentally Sensitive Access Road | |



SOURCE: ESRI Basemaps (2016); Bing Maps (2016); PacifiCorp (2015)

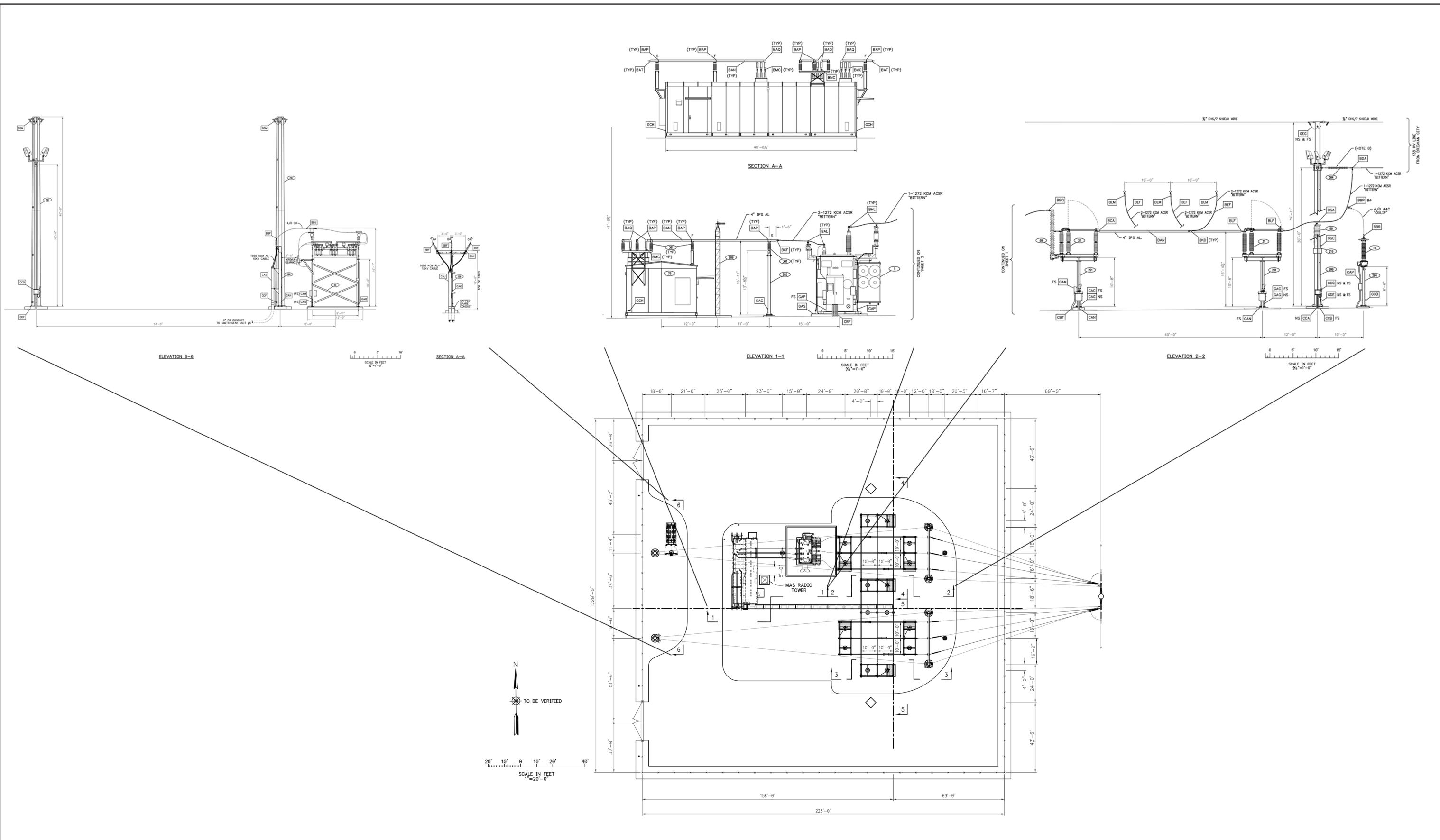
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Lassen Substation Project

FIGURE 4-5
Substation Plan View

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SOURCE: PacifiCorp 2016.

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Lassen Substation Project

FIGURE 4-6
Lassen Substation Plan and Elevation Views

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Transmission Line Connection

Two new guyed wooden poles would be erected to connect the proposed Lassen Substation to the existing Line 2 69 kV transmission line. The poles would be located 30–50 feet to the west of the fenced boundary of the substation (Figure 4-5). The new guyed wooden poles would be between 80 and 90 feet tall and approximately 19 inches in diameter. When the transmission line is looped in and the substation activated, the two existing poles that feed the Mount Shasta Substation would be removed as part of the Mount Shasta Substation demolition.

Distribution Line Connection

Three new distribution lines would run underground from the substation vault located on the southern side of the substation compound to connect to poles in the main 69 kV transmission alignment adjacent to South Stage Road.

The first Black Butte Feeder distribution line would run underground from the substation vault south to Pole 15/48. The second distribution line would run to a new riser pole adjacent to the new access road before going overhead to a new wooden distribution pole between Poles 15/48 and 16/48. The third distribution line would run to the same new pole, but entirely underground (Figure 4-5).

For the underground components, conductors would be placed in plastic conduits laid in 4-foot-wide by 6-foot-deep trenches. Because of the heat production during operation, the trenches would then be backfilled with heat-dissipating material.

4.4.2 Transmission Line Upgrades

The proposed project would replace the neutral and phase conductors and up to 36 poles on the existing 69 kV transmission line, known as Line 2, that feeds the Mount Shasta Substation. Poles and conductor would be replaced from Pole 19/47, which is situated about 4,040 feet north of the existing substation, to Pole 2A/49, which is 2,780 feet south of the proposed substation on West Ream Avenue (Figure 4-3).

The proposed new wooden poles would support the additional weight of new 795 thousand circular mil (kcmil) aluminum conductor, steel reinforced (ACSR), which can operate at 115 kV, and an additional underbuilt distribution line. To meet conductor clearance requirements and accommodate the new distribution conductor, the proposed replacement poles would be 70–75 feet tall and no greater than 19 inches in diameter.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4.4.3 Distribution Line Upgrades

The project proposes to upgrade and rebuild two existing 4.16 kV distribution circuits to 12.47 kV and build a new third 12.47 kV circuit (see Figure 4-4).

The first distribution line, the Pioneer Feeder circuit, would be rebuilt. The neutral and three phase conductors would be strung under the rebuilt 69 kV Line 2, described above. The Pioneer Feeder circuit runs southwest for about 2,400 feet from Pole 16/48 by the substation to Pole 2/49 at Ream Avenue.

The second 12.47 kV distribution line, Black Butte Feeder, would run for 500 feet north between Poles 15/48 and 3/48 on the rebuilt Line 2 transmission poles before turning east, where it would replace the existing 4.16 kV line on existing poles that run along West Lake Street. A new underground line would then run under I-5 to Jessie Street, using existing riser poles.

The third distribution line would be a new 12.47 kV line that would be installed and built under the rebuilt Line 2 running northwest from the substation from Pole 15/48 to Pole 19/47. A new larger-capacity conductor would then replace the conductor on the existing distribution poles that run northeast to cross the I-5 overhead south of Pine Street. It should be noted that the I-5 crossing ~~will~~would not be reconducted; only the line leading to and from this crossing would be replaced. The line would then run underground along Kingston Road and along private roads through Eskaton Washington Manor, a senior living facility, before reemerging to cross the railroad and North Mount Shasta Boulevard to supply industrial facilities on Ski Village Drive (Figure 4-4).

In addition to the three lines discussed above, pole-top stepdown transformers and distribution lines would be installed on existing poles on Chestnut Street and Mill Street to connect the new 12.47 kV lines to the existing 4.16 kV distribution system in the City.

4.4.4 Decommissioning

Upon completion of the new substation, the old substation would be decommissioned: transformers, poles, wooden structures, concrete pads, and other aboveground components would be removed. The current fencing, gravel pad, and large concrete pads would, however, remain to be used as a storage and staging area for future work maintenance and emergency maintenance activities.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4.5 Project Land Requirements

The project would use existing road or utility rights-of-way for the transmission and distribution, but would use new parcels for the new substation. Table 4-1 provides the estimated permanent and temporary acreage area required for the proposed project.

Table 4-1
Permanent and Temporary Acreages Required to Construct and Operate the Project

| Component | Permanent (Acres) | Temporary (Acres) |
|---|---|-------------------|
| Graded substation pad | 1.2134 (substation pad) | |
| Improvement of existing access road, and addition of new road | 0.069 (improvement to existing road) 0.184 (addition of new road) 0.253 (total) | |
| Transmission and distribution pole replacement | <0.002 | 2.238 |
| Pulling and tensioning pads | 0 | 2.869 |
| Directional boring pit and disturbance | 0 | 0.115 |
| Temporary access roads for pole replacement | 0 | 2.182 |
| Storage yards/staging area | 0 | 0.23 |
| Total | 1.468 | 7.634 |

Sources: PacifiCorp 2015, 2016b.

4.6 Construction Activities

This section provides an overview of methods for the construction of the new substation, installation of the new poles and transmission lines, and removal of the old facilities. Table 4-2 lists the typical construction equipment and personnel needed for the various construction activities. Up to 43 personnel would be required at any time, and it is anticipated that about 50% of the work force would be hired locally. The remaining workforce would take up temporary accommodation nearby and commute to the site on a daily basis.

Table 4-2
Estimated Personnel and Equipment

| Activity | People | Quantity and Type of Equipment | |
|-----------------------------------|--------|--------------------------------|------------------------|
| Demolition of Existing Structures | | | |
| Demolition | | 1 | Excavator (with thumb) |
| | | 1 | Track loader |
| | | 2 | Dump trucks |
| Total workforce | 4* | | |
| Substation Construction | | | |
| Construction management | 1 | 1 | Pickup truck |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-2
Estimated Personnel and Equipment**

| Activity | People | Quantity and Type of Equipment | |
|--|---------------|--------------------------------|--------------------------------------|
| Survey | 3 | 1 | Pickup truck |
| Site preparation/grading | 5 | 1 | Backhoe |
| | | 1 | Bulldozer |
| | | 2 | Dump trucks |
| | | 1 | Water truck |
| | | 1 | Pickup truck |
| Material haul | 3 | 1 | Tractor/trailer |
| | | 2 | Yard and field cranes or line trucks |
| | | 1 | Fork lift |
| Access road construction | 2-3 | 1 | Bulldozer (D-8 Cat) |
| | | 1 | Motor grader |
| | | 1 | Pickup truck |
| | | 1 | Water truck (for construction) |
| Concrete placement and formwork | 5 | 1 | Pickup truck |
| | | 1 | Concrete truck |
| | | 1 | Flatbed truck |
| Steel installation | 5 | 1 | Pickup truck |
| | | 1 | Crane |
| | | 1 | Bucket truck |
| | | 1 | Forklift |
| Equipment installation | 4 | 1 | Pickup truck |
| | | 1 | Forklift |
| | | 1 | Crane |
| | | 1 | Manlift |
| Bus work | 4 | 1 | Pickup truck |
| | | 1 | Manlift |
| | | 1 | Welder |
| | | 1 | Crane |
| Testing and energization | 2 | 1 | Pickup truck |
| Fencing | 4 | | — |
| Marshalling yard | 2 | | — |
| Right-of-way restoration and cleanup | 4 | 1 | Bulldozer wide track |
| | | 1 | Dump truck |
| | | 1 | Pickup truck |
| Total workforce | 42-43* | | |
| <i>Transmission/Distribution Line Construction</i> | | | |
| Construction management | 1 | 1 | Pickup truck |
| Survey | 3 | 1 | Pickup truck |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-2
Estimated Personnel and Equipment**

| Activity | People | Quantity and Type of Equipment | |
|---|------------|--------------------------------|-------------------------------------|
| Access road construction | 2 | 1 | Bulldozer (D-8 Cat) |
| | | 1 | Motor grader |
| | | 1 | Pickup truck |
| | | 1 | Water truck |
| Auger holes, direct embed poles | 5 | 1 | Hole digger |
| | | 1 | Water truck |
| | | 1 | Pickup truck |
| | | 1 | Line truck |
| | | 1 | Pump |
| Material haul | 3 | 1 | Tractor trailer |
| | | 2 | Yard and field cranes or line truck |
| | | 1 | Forklift |
| Structure assembly and installation | 5 | 1 | Pickup truck |
| | | 1 | Line truck |
| | | 1 | 2-ton truck |
| | | 1 | Bucket truck |
| Structure erection | 5 | 1 | 2-ton truck |
| | | 1 | Pickup truck |
| | | 1 | Bucket truck |
| | | 1 | Line truck |
| Wire installation (includes old wire removal) | 8 | 1 | Wire reel trailer |
| | | 1 | Diesel tractor |
| | | 1 | Crane |
| | | 1 | Line truck |
| | | 3 | Pickup trucks |
| | | 2 | Bucket trucks |
| | | 2 | 3-drum pullers |
| | | 1 | Single-drum puller |
| | | 1 | Double bull-wheel tensioner |
| | | 1 | Static wire reel trailer |
| Right-of-way restoration and cleanup | 4 | 1 | Bulldozer wide track |
| | | 1 | Dump truck |
| | | 1 | Pickup truck |
| Total workforce | 31* | | |

Source: PacifiCorp 2015.

* Maximum total personnel required considering all tasks; actual personnel on site at any one time will be less.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4.6.1 Substation Construction

The proposed substation site would need to be prepared for construction. This would include the removal and demolition of existing structures, the blocking of the existing well, and the removal of existing vegetation, including all trees in the area proposed for the substation pad. It is anticipated that the size of the substation pad would require the removal of most trees on the two parcels identified for the substation. Figure 4-5 indicates the extent of tree removal expected to be required to accommodate the substation pad.

The site would then be graded in accordance with grading permit requirements of Siskiyou County. It is anticipated that up to 65,000 cubic feet of fill and material would be removed from the site during construction and disposed of at a regulated facility. It is not anticipated that additional clean fill would be brought onto the site. The site would be graded to maintain current drainage configuration and then covered in crushed rock aggregate. Clearing and grading activities are expected to take 6 to 8 weeks to complete.

After grading, belowground construction activities would begin for installation of vaults and electrical conduits for the 12.47 kV distribution circuits, the electrical conduits for equipment power and control, and the grounding grid. Following installation of these components, up to 1,500 cubic feet of concrete foundations would be poured to support the heavier aboveground steel supporting structures and substation equipment. At this time, a 7-foot-high perimeter security fence would be installed. Belowground construction activities are expected to take 4–6 weeks to complete.

The installation of aboveground equipment would overlap with the belowground work. The major substation components, including steel and aluminum support work, 69/12.47 kV transformer with enclosed load to charger, enclosed 12.47 kV switchgear, and 12.47 kV capacitor bank, would be installed over 4–8 weeks. This equipment would be configured to provide a loop in from the Path 2 69 kV transmission line to the transformer and provide three 12.47 kV circuits out to the Mount Shasta service area. The design includes bays for two additional distribution transformers that could be used to expand the capacity of the substation should load in the service area increase.

Following the installation of the aboveground structures, the control and power cables would be pulled into the substation and installed in the new equipment, which would take up to 8 weeks. Connection to the grid would be followed by commissioning, testing, and energization of the new substation, which would take another 8 weeks.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

A construction staging area approximately 100 feet by 100 feet would be required to store material and equipment while the substation is being constructed. The temporary staging area would be sited adjacent to the proposed substation site on PacifiCorp property (Figure 4-7, Temporary Work Areas, Access Areas, and Access Routes). This location would include the site construction office and temporary workers' parking.

4.6.2 Overhead Transmission and Distribution Line Construction

This section describes the construction sequence and methods for overhead transmission and distribution lines. Transmission line upgrades would include the replacement of 36 poles and the existing conductor with poles capable of carrying additional distribution lines and a conductor capable of operating at 115 kV. Distribution line upgrades would include the addition of one new 12.47 kV line distribution line and the replacement of conductor and earth wires on two existing distribution lines.

Surveying

Prior to pole and conductor installation, PacifiCorp would survey for the right-of-way centerline and identify the locations and placement of new poles, the location of work boundaries, and temporary laydown areas for pole assembly.

Pole Replacement

Up to 36 poles would be replaced along the existing Line 2 right-of-way, and 2 new poles would be added to loop the existing transmission line into the new substation. It is anticipated that replacement poles would be 70–75 feet in height and no greater than 19 inches in diameter. Each pole would be brought to the location where it would be erected. Assembly would require a flat temporary work area of approximately 50 feet by 250 feet at each pole location. Wooden poles, cross arms, and insulators would be brought to the site and assembled prior to erection.

The proposed wooden poles would not require a foundation, but each pole would be directly buried. Each pole would require a 2.5-foot-wide by 11.5-foot-deep hole (removing approximately 56 cubic feet of fill). Where ground conditions allow it, each hole would be augered by a power auger mounted on the back of a vehicle. The pole would then be erected using a crane and the hole would be backfilled.

Prior to placement, wooden cross arms, insulators, insulator strings, and stringing sheaves would be installed on each pole to facilitate the subsequent pulling and tensioning of the transmission lines. Stringing sheaves are temporary pulleys that guide the conductor during the stringing process.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Pole Removal

Old poles would be loosened by a hydraulic jack and removed from the site using a truck-mounted crane and a line truck. The hole would then be backfilled using soil from project-related activities in the immediate area. The surface would then be restored to grade and reseeded using suitable native seed mix.

Erecting Guard Structures

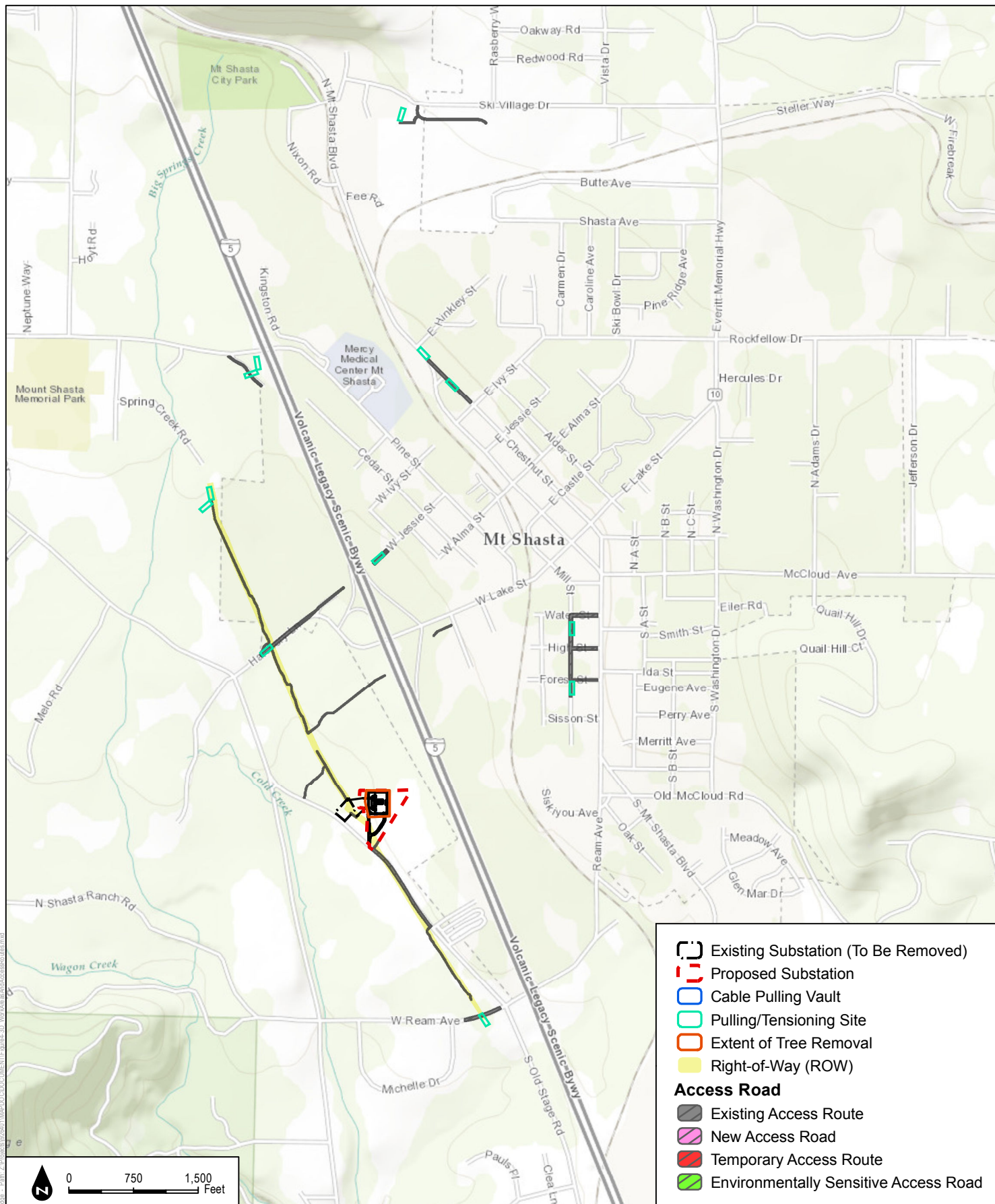
Prior to installation of conductors, guard structures would be erected over roadways for public safety. Guard structures would consist of H-frame poles placed perpendicular to the conductor line on either side of a highway crossing or obstacle. For this project, guard structures are likely to be required for crossing the railroad and North Mount Shasta Boulevard, West Lake Street, and West Ream ~~Road~~ Avenue.

Line Pulling and Tensioning

For pulling and tensioning, about 10 temporary work areas of about 50 feet by 250 feet would be cleared so that the puller, line trucks, and tractors could be positioned to pull and tension the conductors. The locations of temporary work areas have been selected to minimize the need for clearance and where feasible use existing, accessible graded areas. The locations of the temporary work areas are shown on Figure 4-7.

For each leg of the transmission and distribution line to be reconductored, a pilot line would be strung and pulled through the sheaves. The pilot line would in turn pull the thicker stringing line that would be used to guide the actual conductor through the sheaves on each pole. The process would then be repeated for each conductor and ground wire and the fiber optic shield until all wires are in position.

After the conductor is pulled in, lines would be spliced together and the wire tensioned and sagged to the required specifications before being secured to the dead-end structures. Any required mid-span splicing would be performed. Once the splicing has been completed, the wire would be sagged to the proper tension and dead-ended (secured) to structures. Finally, the wire would be secured to the insulators on each pole.



SOURCE: ESRI Basemaps (2016); PacifiCorp (2015)

FIGURE 4-7

Temporary Work Areas, Access Areas, and Access Routes

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4.6.3 Underground Distribution

Parallel runs of approximately 450 feet of conduit would be installed under I-5 from boring locations located on West Jessie Street to the west of I-5 and on West Jessie Street/Willow Street to the east of I-5. Once in place, the three insulated aluminum distribution cables would be passed through the conduit and connected to new riser poles on either side of I-5.

Temporary entry and exit pits of approximately 6 feet by 6 feet would be dug at the ends of West Jessie Street/Willow Street nearest I-5 to allow for the boring and placement of new 6-inch conduit under I-5 (a second 6-inch conduit would be installed immediately adjacent as a spare); the anticipated drill holes would be approximately 6 inches in diameter. The boring locations would occur within existing concrete areas; the street and concrete areas would be restored to existing conditions once construction of the underground distribution line is complete. Entry and exit pits would require temporary work areas of no more than 50 feet by 100 feet and would be located adjacent to the existing riser poles on West Jessie Street and Willow Street.

The drilling process generally consists of locating a conduit pipe in a hole drilled along an underground arc between entry and exit pits, if needed, on each end of the distribution line, using a boring machine that is a specialized horizontal drilling rig. The boring machine pushes and guides a drilling head connected to hollow pipe into the ground at a designated angle based on site conditions. Drilling mud and/or bentonite would be used to ensure that the hole around the conduit would be filled without voids. Based on the width of the boring (6 inches), the amount of drilling mud and/or bentonite would be minimal. When the bore head and rod emerge on the opposite side of the crossing, a special cutter, called a back reamer, is attached and pulled back through the pilot hole. The reamer bores out the pilot hole so that the pipe can be pulled through. Once the drilling is complete and the conduit is in place, the underground cables may be fed through the conduit.

Overhead to underground transition structures on both sides of the freeway would be replaced with new poles. However, it is anticipated that they would have the same configuration, height, and size as the existing structures and would be located in the same general location as the existing structures.

4.6.4 Mount Shasta Substation Demolition and Removal of Old Distribution Lines

Following the construction and energization of the Lassen Substation, the Mount Shasta Substation would be dismantled. The wooden frameworks, the transformers, and the larger concrete bases would be removed. Fencing, concrete pads, and gravel surface would remain to form a compound that would be used by PacifiCorp as a storage yard for poles and for emergency construction purpose.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

After the aboveground components have been removed, the underlying soil would be sampled for oil and PCB contamination. If any contamination is detected that is above state or federal concentrations, the area would be restored in accordance with current regulatory guidelines.

4.7 Construction Schedule

Construction of the substation and replacement of transmission lines and distribution lines would occur concurrently. In order to maintain continuous service, it is anticipated that demolition of the old substation would occur after the construction of the new substation and associated facilities. Working a 10-hour day over a 5-day week, the construction activity would consist of about 41 weeks of work over a maximum of 12 months. Table 4-3 provides a more detailed breakdown of the construction sequence, assuming a 41-week schedule (PacifiCorp 2016c).

Table 4-3
Proposed Schedule for Construction of the Project

| Task | Maximum Work Days | Weeks | | | | | |
|---|-------------------|-------|---|----|----|----|-------|
| | | 1 | 8 | 15 | 23 | 31 | 39 41 |
| Demolition and grading for new substation | 40 | | | | | | |
| Below-grade Construction | 30 | | | | | | |
| Above-grade construction | 40 | | | | | | |
| Installation power and control cables | 40 | | | | | | |
| Commissioning new substation | 40 | | | | | | |
| Old substation demolition | 10 | | | | | | |
| Aerial transmission construction | 172 | | | | | | |
| Distribution line construction | 192 | | | | | | |

Source: PacifiCorp 2016c.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4.8 Operation and Maintenance

Operational activities would be similar to present activities; maintenance and repair crews would visit on a monthly or as-needed basis. Transmission line inspection would be in accordance with GO-95 and GO-165 and would usually be expected to occur on an annual or half-yearly basis, or as needed should repair issues or outages arise.

4.9 Applicant Proposed Measures

The PEA details project protocols that would be followed during project-related activities (PacifiCorp 2015). Project protocols are specific to environmental issue areas and are herein termed applicant proposed measures (APMs). Table 4-4 lists APMs proposed as project design features. These APMs are analyzed as part of the proposed project.

Table 4-4
Applicant Proposed Measures

| APM Number | Description |
|--------------------|--|
| <i>Air Quality</i> | |
| APM-AQ-1 | <p>Construction Pollutant Reduction Measures:</p> <p>Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:</p> <ul style="list-style-type: none">• Minimize soil disturbance.• Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site.• Curtail earthmoving activities on windy days.• Ensure that the engines of all construction equipment are properly tuned.• Limit the maximum speed to 15 miles per hour on unpaved surfaces.• Replant vegetation in disturbed areas as quickly as possible.• Implement other effective particulate matter control measures, as needed. <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none">• Use California Air Resources Board-certified construction equipment, where available.• Use alternative fuel types for construction equipment where feasible.• Use local building materials.• Limit construction vehicle idling time. <p><u>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</u></p> <ul style="list-style-type: none">• <u>Use California Air Resources Board-certified construction equipment, where available.</u>• <u>Use alternative fuel types for construction equipment where feasible.</u>• <u>Use local building materials.</u>• <u>Limit construction vehicle idling time.</u> |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-4
Applicant Proposed Measures**

| APM Number | Description |
|-----------------------------|--|
| <i>Biological Resources</i> | |
| APM-BIO-1 | <p>Focused pre-construction surveys for special-status plant species shall be conducted in appropriate habitat; <u>and at the time of year when species are both evident and identifiable (typically when the species is flowering or fruiting)</u>, according to U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) protocols for species having a specified protocol, or according to standard, scientifically accepted systematic surveys appropriate for each species. Surveys will <u>shall</u> be conducted in areas of planned ground disturbance <u>prior to such disturbance occurring</u>. To the extent feasible, avoidance modifications in the placement of transmission towers, access and spur roads, and of various marshalling and staging areas shall be made in accordance with the final project design and needs. If special-status plant species are located during focused surveys within the project area, avoidance measures shall be incorporated. If avoidance is not possible, relocation efforts, including topsoil salvage and relocation, if necessary, will be implemented. If PacifiCorp proposes any changes to the current construction plan or pole replacement sites after focused surveys for special-status species are conducted, additional field surveys shall be required prior to construction activities.</p> <p>Pre-construction biological clearance surveys shall be conducted to avoid or minimize potential impacts to special-status wildlife species. <u>This includes surveys for bat species, which shall be conducted by a qualified bat biologist and shall include focused searches for daytime and maternal roost sites appropriate for the bat species most likely to be roosting within the project right-of-way. If active bat roosts are discovered during pre-construction surveys, the qualified bat biologist shall coordinate with CDFW on appropriate avoidance/minimization measures, including the type and timing of such measures, to be implemented. If active special-status mammal burrows are located during surveys, avoidance measures shall be incorporated and the Environmental Monitor shall proceed as described in APM-BIO-6. Any special-status plant or wildlife species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.</u></p> |
| APM-BIO-2 | <p>Prior to first use, the undercarriages, wheels, and bodies of construction and operations equipment previously used outside of the project area shall be thoroughly washed in maintenance yards by high-pressure jets to eliminate any soil buildup that may contain invertebrates, such as insects and insect eggs, or the seeds of exotic plant species.</p> |
| APM-BIO-3 | <p>Every reasonable effort shall be made to minimize temporary and permanent removal of native vegetation at work areas. If required, native vegetation shall be flagged for avoidance. If native vegetation cannot be avoided, it will be <u>crushed or cut rather than bladed or rooted out</u>. A project revegetation plan shall be prepared for areas of native vegetation temporarily affected by project construction activities. <u>The revegetation plan shall be prepared by a qualified botanist or revegetation specialist and submitted to the California Department of Fish and Wildlife for review prior to any construction or ground disturbance of the area that will be temporarily impacted. The plan shall include, at a minimum, a discussion of the following: qualifications and experience of individuals performing the revegetation; methods (including soil preparation, seeding, planting, irrigating) to be used to revegetate the impacted area; monitoring methods and data to be collected on the revegetated area; success criteria; steps to be taken if the revegetation is not successful; and adaptive management to be implemented.</u></p> |
| APM-BIO-4 | <p>Construction crews shall avoid affecting the streambeds and banks of any streams along the route, to the extent feasible. If necessary, a Lake and Streambed Alteration Agreement (LSAA) <u>shall be prepared and submitted to the California Department of Fish and Wildlife for review and approval prior to construction in the affected area will be secured from the CDFW</u>. Impacts will <u>shall</u> be mitigated based on the terms of the LSAA. No streams with flowing waters or those capable of supporting special-status species would be expected to have permanent adverse impacts from project implementation.</p> |
| APM-BIO-5 | <p>To avoid impacts from temporary access to wetland areas, existing access roads and temporary access methods (e.g., high density polyethylene (HDPE) driving mats, portable road platforms) shall be used to access pole replacement sites. Results of the wetland delineation (Appendix D of the PEA) shall be</p> |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-4
Applicant Proposed Measures**

| APM Number | Description |
|-------------------|--|
| | incorporated into vehicle access routes, which shall be designed to avoid and minimize wetland disturbance. |
| APM-BIO-6 | Environmental Monitors shall be assigned to the project, and will be responsible for ensuring that impacts to special-status species, <u>wetlands</u> , native vegetation, wildlife habitat, and unique resources are avoided to the fullest extent possible. The monitor shall delineate and mark for avoidance in the field all known sensitive resource locations and, where appropriate, use flagging to delineate boundaries of areas from where activities are restricted to protect <u>wetlands</u> , native plants and wildlife, or special-status species. If the monitor determines that project activities may adversely affect the species, the monitor shall <u>have authority to halt construction activities until the monitor can</u> consult with <u>the U.S. Fish and Wildlife Service USFWS and/or California Department of Fish and Wildlife CDFW</u> regarding appropriate avoidance measures. These restricted areas shall be monitored during construction to ensure their protection. |
| APM-BIO-7 | PacifiCorp shall conduct all pole installation, conductor installation, tree trimming, tree removal, grading and clearing of vegetation from September 1 to February 28, outside of the nesting season. The March 1–August 31 nesting season dates are guidelines: nesting season may begin earlier or end later depending on weather conditions; active nests will be protected using appropriate buffers regardless of the calendar date. If construction cannot be completed outside of the nesting season, pre-construction surveys within the project area will be conducted by a qualified biologist for nests prior to ground disturbance, tree trimming, or other construction activities. The nesting bird clearance survey will be conducted within 3 days prior to construction activities. For passerines, a 50-foot buffer will be installed around the nest and maintained around the nest until the young have fledged. A larger buffer may be required if nesting birds appear stressed. Nesting raptors require a larger buffer area than passerines. If a raptor nest is observed, a 300-foot buffer will be installed. If a nesting raptor is observed within 300 feet of the project area prior to the start of construction, a qualified biologist will determine whether or not construction activities could potentially disturb nesting raptors and implement appropriate measures (e.g., on-site monitor, timing restriction) to adequately protect nesting raptors. <u>Any special-status bird species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.</u> |
| APM-BIO-8 | A Worker Environmental Awareness Program (WEAP) shall be prepared and all construction crews and contractors shall be required to participate in WEAP training prior to starting work on the project. The WEAP training shall include a review of the special-status species and other sensitive resources that could occur in the project area, the locations of any existing sensitive resources, their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. A record of all personnel trained shall be maintained. |
| APM-BIO-9 | Migratory bird flight paths in the project area are currently unknown. An impact assessment study and bird observation surveys shall be conducted according to the Avian Power Line Interaction Committee's (APLIC's) (1994) survey protocol. The surveys shall be conducted within wetlands along both sides of the existing transmission line within the study area. The surveys shall be done in consultation with <u>the California Department of Fish and Wildlife, CDFW</u> . Results of the bird observation surveys will determine potentially impacted species and locations to mark wires to increase their visibility to flying birds. Line markers should be designed to be raptor-safe in accordance with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2012 (APLIC 2012), evaluated and approved by PacifiCorp engineers prior to implementation. |
| APM-BIO-10 | Vehicles shall be restricted to previously established roadways and access routes. |
| APM-BIO-11 | Trash, dumping, firearms, open fires, hunting, and pets shall be prohibited in the project area. |
| APM-BIO-12 | If construction within and near potential <u>willow flycatcher</u> Willow Flycatcher habitat (riparian scrub and surrounding wet meadow) cannot be completed outside of the <u>willow flycatcher</u> Willow Flycatcher breeding season (June 1 <u>through</u> to August 31), broadcast surveys shall be conducted to determine presence/absence of the species prior to construction activities. If absence is determined, construction may begin within the |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-4
Applicant Proposed Measures**

| APM Number | Description |
|---------------------------------|--|
| | potential Willow Flycatcher habitat. If presence is determined, flycatcher detections nests will shall be buffered by 450 500 feet, or as otherwise determined in consultation with the California Department of Fish and Wildlife, and construction activities will shall not occur within the buffer area for the remainder of the breeding season. <u>Any willow flycatcher observed during surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.</u> |
| APM-BIO-13 | Operation and maintenance activities that must occur in or near potential willow flycatcher Willow Flycatcher habitat (riparian scrub and surrounding wet meadow) will shall be conducted outside of the willow flycatcher Willow Flycatcher breeding season (June 1 through to August 31), whenever practicable. <u>If project construction occurs within habitat occupied by nesting willow flycatcher, because the species is state listed as endangered, a state Incidental Take Permit would be required.</u> |
| <i>Geology and Soils</i> | |
| APM-GEO-1 | The project will be designed and constructed in accordance with recommendations included in the project-specific geotechnical investigation: site grading, excavation and utility trenches, foundations, mitigation of soil corrosivity on concrete, seismic design criteria, and unpaved site access road. |
| <i>Greenhouse Gas Emissions</i> | |
| APM-AQ-1 | <p>Construction Pollutant Reduction Measures:</p> <p>Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:</p> <ul style="list-style-type: none"> • Minimize soil disturbance. • Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site. • Curtail earthmoving activities on windy days. • Ensure that the engines of all construction equipment are properly tuned. • Limit the maximum speed to 15 miles per hour on unpaved surfaces. • Replant vegetation in disturbed areas as quickly as possible. • Implement other effective particulate matter control measures, as needed. <p>Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:</p> <ul style="list-style-type: none"> • Use California Air Resources Board-certified construction equipment, where available. • Use alternative fuel types for construction equipment where feasible. • Use local building materials. • Limit construction vehicle idling time. <p><u>Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:</u></p> <ul style="list-style-type: none"> • <u>Use California Air Resources Board-certified construction equipment, where available.</u> • <u>Use alternative fuel types for construction equipment where feasible.</u> • <u>Use local building materials.</u> • <u>Limit construction vehicle idling time.</u> |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-4
Applicant Proposed Measures**

| APM Number | Description |
|--|---|
| <i>Hazards and Hazardous Materials/Fire Safety</i> | |
| APM-HAZ-1 | <p>Health and Safety Plan. A <u>health and safety plan</u> Health and Safety Plan shall be prepared and made available once a contractor is procured for the construction of the proposed project. The plan should include, and not be limited to, information on the appropriate personal protective equipment to be used during construction. All transport of hazardous materials would be in compliance with applicable laws, rules and regulations, including the acquisition of required shipping papers, package marking, labeling, transport vehicle placarding, training, and registrations.</p> |
| APM-HAZ-2 | <p>Hazardous Substance Control and Emergency Response Plan. PacifiCorp shall prepare and implement a Hazardous Substance Control and Emergency Response Plan as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of project construction through operation. The plan would include, but not be limited to, worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they would be managed in accordance with all applicable regulations. Material safety data sheets would be maintained and kept available on site, as applicable.</p> <p>All hazardous materials and hazardous wastes would be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Proper disposal of potentially contaminated soils. • Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. • Emergency response and reporting procedures to address hazardous material spills. • Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit. <p>PacifiCorp will complete its Emergency Action Plan Form as part of project tailboard meetings. The purpose of the form is to gather emergency contact numbers, first aid location, work site location, and tailboard information.</p> |
| APM-HAZ-3 | <p>Spill Prevention, Countermeasure, and Control (SPCC) Plan. An SPCC plan shall be prepared and certified by a professional engineer; a complete copy would be maintained on site. The SPCC plan would include engineered and operational methods for preventing, containing, and controlling potential releases and provisions for a quick and safe cleanup.</p> |
| <i>Hydrology and Water Quality</i> | |
| APM-WQ-1 | <p>Stormwater Pollution Prevention Plan (SWPPP) or Erosion Control Plan Development and Implementation. An erosion and sediment control plan would be developed prior to construction and included as part of the required SWPPP. The goal of the SWPPP will be to remove sediment and wastes from runoff before the runoff is discharged from the project site. This would be accomplished by:</p> <ul style="list-style-type: none"> • Minimizing the acreage of disturbed and exposed soil during the construction phase and implementing stabilization measures where necessary. • Removing sediment from runoff before it leaves the site. • Complying with specific erosion and sediment control measures specified within the erosion and sediment control plan. <p>Methods may include preservation of existing vegetation or use of geomats, straw wattles, straw bale barriers,</p> |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-4
Applicant Proposed Measures**

| APM Number | Description |
|-----------------------------------|---|
| | <p>or silt fencing, which would be placed at construction boundaries. Gravel ramps may be installed at access points to public roadways to prevent or minimize the tracking of mud, dirt, sediment, or similar materials onto the roadway. Selection of appropriate erosion control materials will be based on soil properties, steepness of the slope, and anticipated surface flow or runoff.</p> <p>Diesel fuel, gasoline, oil, and other lubricants, as well as adhesives and sealants, would be utilized during the construction of the transmission line and substation. Bulk quantities may be stored in the designated construction yard/staging area. Vehicle fueling and maintenance activities would be restricted to staging areas or approved areas away from drainage channels and sensitive habitats. All construction vehicles would be monitored for leaks and receive regular off-site preventive maintenance to reduce the chance of leakage.</p> <p>A copy of the SWPPP and of Receipt of the Letter of Intent, including the project's Waste Discharge ID Number, will be provided to the California Public Utilities Commission prior to construction to certify compliance with Order 2009-0009-DWQ Construction General Permit. The SWPPP will be updated during construction as required by the State Water Resources Control Board.</p> |
| APM-WQ-2 | <p>Restoration. To reduce visual contrast and siltation in construction where ground disturbance is substantial, surface preparation and reseeding shall occur during the last phase of construction. The method of restoration would normally consist of loosening the soil surface, reseeding, installing cross drains for erosion control, placing water bars in the road, and filling ditches. These actions shall occur in areas of exposed soils large enough that, if they remain unremediated once construction is completed, they could exceed water quality objectives of receiving waters (e.g., for sediment, turbidity, temperature, and dissolved oxygen) set forth in the Water Quality Control Plan for the Sacramento and San Joaquin River Basins.</p> |
| APM-WQ-3 | <p>Pole Placement Minimization/Avoidance. To minimize the amount of sensitive features disturbed in designated areas, poles would be placed so as to avoid sensitive features and/or to allow conductors to clearly span the features, within limits of standard pole design. If the sensitive features cannot be completely avoided, poles would be placed so as to minimize the disturbance.</p> |
| <i>Transportation and Traffic</i> | |
| APM-TT-1 | <p>Traffic Management Plan. Prior to the start of construction, PacifiCorp shall prepare a Traffic Management Plan. The Plan would define the use of flag persons, warning signs, lights, barricades, cones, etc. to control construction traffic. The Plan would include but not be limited to the following:</p> <ul style="list-style-type: none"> • All property owners and residents of streets affected by construction shall be notified prior to the start of construction. Advance public notification shall include postings of notices and appropriate signage of construction activity. Access to all residences and properties near the project shall be maintained at all times. • All construction activities shall be coordinated with local law enforcement and fire protection agencies. Emergency service providers shall be notified of the timing, location, and duration of construction activities. • Road use-related wear and tear shall be documented during construction of transmission line facilities and PacifiCorp shall repair any damaged roadway sections, as applicable. |

Sources: PacifiCorp 2015, 2016a.

4.10 Key Permits and Approvals

Key permits and approvals presumed necessary for implementation of the proposed project are presented in Table 4-5.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 4-5
Required Permits and Approvals**

| Permit/Approval | Accepting Authority/ Approving Agency | Statutory Reference |
|--|--|--|
| <i>Federal</i> | | |
| Clean Water Act 404 Preconstruction Notification | U.S. Army Corps of Engineers | Clean Water Act, Section 404; 33 CFR 320–330 |
| Permit to cross Federal-Aid Highway | Federal Highway Administration | 23 CFR 1.23 and 1.27; 23 CFR 645 Subpart B; 23 CFR 77 |
| <i>State of California</i> | | |
| Permit to Construct | CPUC | CEQA, Cal Pub. Res. Code Sec. 21000 et seq. and Public Utilities Code Section 1001 |
| Encroachment Permit | California Department of Transportation, District 2 – Redding | Section 671.5(a) of the California Streets and Highways Code |
| Streambed Alteration Program – Notification | California Department of Fish and Wildlife, Northern Region (1) | Fish and Game Code, Sections 1602 and 1603 |
| Section 401 CWA Water Quality Certification | State Water Resources Control Board – California Water Quality Control Board for Central Valley, Region 5 (Redding Office) | Federal Clean Water Act, Section 401 |
| State Waste Discharge Requirements (WDRs) – obtained as part of the 401 Water Quality Certification | State Water Resources Control Board – California Water Quality Control Board for Central Valley, Region 5 (Redding Office) | Porter-Cologne Water Quality Control Act |
| General Discharge Permits for Storm Water Associated with Construction Activity | State Water Resources Control Board – S.M.A.R.T.S. Database | Federal Clean Water Act, Section 402 |

4.11 **References Cited**

17 CCR 95350–95359. “Regulation for Reducing Sulfur Hexafluoride Emissions from Gas Insulated Switchgear (Refs & Annos).”

PacifiCorp. 2015. *Lassen Substation Proponent’s Environmental Assessment*. Prepared by Power Engineers. October 2015.

PacifiCorp. 2016a. Lassen Substation Response to CPUC Data Request 2.0. Prepared by Power Engineers.

PacifiCorp. 2016b. Lassen Substation Amendment. Prepared by Power Engineers.

PacifiCorp. 2016c. Lassen Substation Response to CPUC Data Request 1.0. Prepared by Power Engineers.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5 ENVIRONMENTAL CHECKLIST AND DISCUSSION

This Initial Study includes analyses of the 17 environmental issue areas listed below by section number. These issue areas incorporate the topics presented in the California Environmental Quality Act (CEQA) Environmental Checklist (14 CCR 15000 et seq., Appendix G).

| | | | |
|-----|------------------------------------|------|-------------------------------|
| 5.1 | Aesthetics | 5.10 | Land Use and Planning |
| 5.2 | Agriculture and Forestry Resources | 5.11 | Mineral Resources |
| 5.3 | Air Quality | 5.12 | Noise |
| 5.4 | Biological Resources | 5.13 | Population and Housing |
| 5.5 | Cultural Resources | 5.14 | Public Services |
| 5.6 | Geology and Soils | 5.15 | Recreation |
| 5.7 | Greenhouse Gas Emissions | 5.16 | Transportation and Traffic |
| 5.8 | Hazards and Hazardous Materials | 5.17 | Utilities and Service Systems |
| 5.9 | Hydrology and Water Quality | | |

Explanations for the checklist findings, as well as existing conditions, are provided for each environmental issue area.

Environmental Setting

The Environmental Setting sections present a description of the physical environment for each of the 17 environmental parameters analyzed for the South of Palermo 115-kilovolt (kV) Power Line Reinforcement Project (proposed project). The discussion of environmental setting varies among the parameters. The content and level of detail of the Environmental Setting section is relative to the parameter discussed and the extent of the potential impacts that could occur from project activities.

Regulatory Setting

Current regulatory settings are presented in the Regulatory Setting sections of the 17 environmental parameter sections. Federal, state, regional, and local regulations applicable to the project are identified.

Applicant Proposed Measures

PacifiCorp, the proposed project applicant (applicant), has proposed project design features to be integrated into the proposed project. These features are elements of the project design,

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

construction, and operation that are specifically designed to avoid and minimize impacts to environmental resources. These are referred to as applicant proposed measures (APMs) and are numbered and provided in full in this section of each environmental parameter discussion.

Environmental Impacts and Mitigation

The results of the environmental analyses conducted for the proposed project are presented in these portions of Sections 5.1 through 5.17. Each of the environmental analysis discussions presents the following:

- Significance criteria
- Impact discussion
- Levels of significance
- Mitigation measures

The significance criteria are a benchmark for determining whether a project would result in significant environmental impacts when evaluated against the baseline (i.e., existing conditions). Each of the environmental analysis sections presents discussions about the potential effects of the proposed project on the environment. Analyses are presented for each CEQA Environmental Checklist question, accompanied by a determination made as to whether or not the proposed project would result in a significant environmental impact based on the established thresholds of significance. Mitigation measures are identified, if warranted, that could reduce the impact to a less than significant level. The impact analyses are divided into the basic phases of the project (i.e., construction, operation, and maintenance) and further divided by component if warranted by the environmental parameter, significance criterion, or impact analysis.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.1 Aesthetics

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|-------------------------------------|--------------------------|
| AESTHETICS – Would the project: | | | | |
| a) Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

5.1.1 Environmental Setting

Scenic Vistas

Although the Siskiyou County (County) and City of Mount Shasta (City) General Plan do not identify or formally designate scenic vistas in the County or City, the segment of Interstate 5 (I-5) within the proposed project area is part of the 500-mile-long Volcanic Legacy Scenic Byway and is an eligible state scenic highway. The segment of I-5 between U.S. Route 97 (US-97) and State Route 89 (SR-89) is a County-designated scenic freeway. In addition to occasional open meadows and pastures that are interrupted by tall stands of pine trees in the freeway right-of-way, coniferous forest and oak woodland-covered hills; the tall, conical form of Black Butte; and the rugged terrain of the snowcapped Mount Shasta and satellite cones are visible in middleground and background views from I-5 as it traverses the project area. Figure 5.1-1, Existing Views Available from I-5 through the Project Area, is representative of existing views of the surrounding landscape available to northbound I-5 motorists as they pass through the Mount Shasta area. In addition to interstate motorists, the area's scenic resources are also visible from surface roadways and Mount Shasta area residences. Figure 5.1-2, Existing Views Available from Hatchery Lane, depicts existing views to area scenic resources from Hatchery Lane, a local public road. Given the scenic designations associated with I-5 through the project area and the visibility of scenic resources (i.e., vegetation and terrain) that are characteristic of the local landscape, scenic vistas are available in the project area.

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Scenic Highways

In the proposed project area, the approximately 10-mile-long segment of I-5 between US-97 near the City of Weed and SR-89 near the City of Mount Shasta is part of the 500-mile-long Volcanic Legacy Scenic Byway, a congressionally recognized roadway designated by the Federal Highway Administration (FHWA) as an “All-American Road.” The same segment of I-5 is an eligible state scenic highway (and a component of the California Department of Transportation (Caltrans)-managed State Scenic Highway Program) and a County-designated scenic freeway. According to Siskiyou County, scenic freeways are those that traverse the most efficient route to or between areas of major scenic, cultural, or recreational attractions (Siskiyou County Planning Department 1974). Existing views from I-5 in the project area are dominated by mountainous terrain (including Mount Eddy and the Eddy Range) to the west, Mount Shasta and its satellite cones to the east, and the volcanic Black Butte to the north.

Please refer to Section 5.1.2, Regulatory Setting, for information regarding federal, state, and regional/local scenic roadway designations.

Existing Visual Character

The proposed project is located in and just outside of the City of Mount Shasta’s city limits and within the pastoral landscape of the Strawberry Valley area. In addition to I-5, which features two travel lanes in each direction, a central swale planted with grasses and occasional coniferous trees, and 8-foot-wide shoulders lined by low metal guard railing (see Figure 5.1-1), development in the immediate project area (i.e., west of I-5) is scattered and largely composed of single-story, low-density rural residences, agricultural outbuildings, limited mobile home park development, and electrical distribution and transmission infrastructure. Although the mobile home park development displays an orderly layout, rural residences in the area are generally dispersed throughout the landscape and separated by clusters of tall coniferous trees and undeveloped expanses of golden-hued wet or dry montane meadows managed as grazing pastures or wetland areas. In addition to coniferous forest and meadows, vegetation communities in the project area include non-native grasslands, fen, and riparian scrub. The Strawberry Valley abuts densely forested hills and rugged, volcanic mountainous terrain. Figures 5.1-3 and 5.1-4, Existing Landscape Setting, depict existing views of the project area landscape available from local roadways near the existing Mount Shasta Substation.



Existing View from NB I-5 near West Ream Avenue



Existing View from NB I-5 near West Lake Street

SOURCE: Google 2015

Existing Views Available from I-5 through the Project Area

FIGURE 5.1-1

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Existing View from Hatchery Lane looking north



Existing View from Hatchery Lane right-of-way looking east

SOURCE: Dudek 2016

FIGURE 5.1-2 Existing Views Available from Hatchery Lane

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View east from North Old Stage Road across meadow and coniferous forest landscape toward Mt. Shasta



View west from South Old Stage Road across meadow and coniferous forest landscape toward the Eddy Range

SOURCE: Dudek 2016; Power Engineering, Inc. (2016)

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FIGURE 5.1-3
Existing Landscape Setting (1 of 2)

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View northwest from Hatchery Lane toward meadow and
coniferous forest landscape



View north from North Old Stage Road

SOURCE: Dudek 2016; Power Engineering, Inc. (2016)

FIGURE 5.1-4 Existing Landscape Setting (2 of 2)

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Development east of I-5 in the Mount Shasta area is denser and more varied and features hotel, retail, fast-food restaurant, and commercial businesses; however, the area is similarly dotted with mature street and landscape trees and occasional expanses of densely vegetated natural areas.

Although Mount Shasta (approximate elevation of 14,162 feet above mean sea level) and its satellite cones tend to dominate easterly views from I-5, local surface streets, and other viewing locations in the Mount Shasta area, rolling, coniferous forest-covered hills, the wide, slightly concave form of Mount Eddy, and the conical form of Black Butte are also visible and contribute to the volcanic landscape of the surrounding area.

Sensitive Receptors

As discussed above, existing development in the immediate project area consists of rural residences, scattered agricultural outbuildings, I-5, and local surface roads. As such and for the purposes of this analysis, sensitive receptors include surrounding area residents and motorists on I-5 and local surface roads. Due to the proximity of Lake Siskiyou, City of Mount Shasta parks, and the Shasta-Trinity National Forest to the project area, recreationists were also considered. However, due to intervening terrain and vegetation, views to the proposed project component locations are generally not available from recreational areas. For example, Lake Siskiyou is located as close as 0.75 miles to the southern extent of the project area as measured from the intersection of West Ream Avenue and Michele Drive. However, existing pine-tree-covered terrain located north of North Road and dense stands of trees located east and west of West A Barr Road would block proposed project component locations from views of Lake Siskiyou recreationists. Furthermore, the nearest National Forest recreational amenity, McBride Springs Campground, is located more than 2.5 miles northeast of the nearest project component location. Forested terrain surrounding the campground obstructs much of the City of Mount Shasta, including proposed project component locations, from view. As such, the views of recreationists are not considered in this analysis.

Residents

Proposed project components would be primarily located within the Strawberry Valley area, a pastoral landscape that features montane meadows, natural areas covered with stands of coniferous forest and riparian scrub, and scattered rural residences. Areas afforded views of the proposed project components would include the residential neighborhoods on North and South Old Stage Road, West Ream Avenue, West A Barr Road, Hatchery Lane, West Jesse Street, and Michele Drive. In addition to rural single-family residences, project components (i.e., several rebuilt transmission structures) may be visible to residents of the 63-site Chateau Shasta Mobile Home Park (704 South Old Stage Road). Depending on the location

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

and presence of vegetation, residences may be afforded obstructed or partially obstructed views to proposed project components. Although existing transmission and distribution lines and structures and the Mount Shasta substation are existing features in the landscape and are visible to area residents, this viewer group is consider highly sensitive to changes in the landscape due to expectations of views to a primarily natural pastoral and mountainous landscape and the stationary nature of their views.

Representative views of the surrounding landscape from project area residential areas are depicted on Figures 5.1-2 through 5.1-4.

Motorists

As they travel through the project area, motorists on local area roads, including North and South Old Stage Road, West Ream Avenue, West A Barr Road, Hatchery Lane, West Jesse Street, and Michele Drive, would be afforded views to proposed project components, including rebuilt transmission and distribution lines, new wooden poles, and the proposed Lassen Substation. Existing transmission and distribution lines are installed along Old Stage Road and West Ream Avenue, and the existing Mount Shasta Substation is located immediately adjacent to West Ream Avenue. Because the majority of local area road motorists are assumed to be local residents, these viewers are considered highly sensitive to changes in the landscape.

In addition to motorists on local roads, northbound and southbound I-5 motorists would also be afforded views to a segment of the proposed reconductored existing distribution line located west of the interstate and a new overhead circuit that would span the interstate approximately 0.25 miles north of the West Lake Street overpass. As previously stated, the segment of I-5 located in the project area is part of the Volcanic Legacy Scenic Byway and is designated as an All-American Road by the FHWA. In addition, the segment is an eligible state scenic highway and is a Siskiyou-County designated scenic freeway due to available views to the scenic volcanic and mountainous landscape of the Mount Shasta area. For example, motorists' views from north- and southbound I-5 are dominated by volcanic, mountainous terrain located in the background viewing distance to the west (i.e., Mount Eddy and the Eddy Range) and to the east (i.e., Mount Shasta and satellite cones, including Shastina). The conical form of Black Butte is also visible to northbound I-5 motorists as they pass through the project site and is visually prominent in northerly-oriented views. Although I-5 motorists travel through the area at high speeds (the posted speed limit is 65 miles per hour) and existing electrical transmission and distribution infrastructure is visible from north- and southbound travel lanes, the I-5 viewshed contains scenic resources and is considered scenic by the FHWA, Caltrans, Siskiyou County, and the City of Mount Shasta. Therefore, because of the scenic designation of I-5 through the project area, interstate motorists are considered moderately sensitive to changes in the landscape.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Light and Glare

Existing sources of nighttime lighting in the project area are relatively limited and consist of interior and exterior lighting associated with scattered residential development adjacent to Old Stage Road, tall overhead cobra-style streetlights aligned along the north- and southbound I-5 off-ramps at Lake Street, security lighting mounted to the building exteriors of auto-oriented services along Mount Shasta Boulevard, and vehicle headlights on the interstate and surface roads. In addition to overhead lighting and vehicle headlights, existing sources of glare consist of metallic siding buildings on Mount Shasta Boulevard and metallic siding roofs atop occupied and vacant structures along Old Stage Road.

5.1.2 Regulatory Setting

Federal

National Scenic Byway Program

The FHWA's National Scenic Byway Program was established to help recognize, preserve, and enhance selected roads throughout the United States. Criteria for the National Scenic Byways Program were established by the FHWA in 1995 and National Scenic Byways (or All-American Roads) are designated based on their archaeological, cultural, historic, natural, recreational, and scenic intrinsic qualities (FHWA 2016a). To be designated as a National Scenic Byway, a road or highway must meet at least one of the six scenic byway intrinsic qualities. To be designated an All-American Road, the road or highway must meet the criteria for at least two of the intrinsic qualities. In addition, the road or highway must provide "an exceptional traveling experience that is so recognized by travelers that they would make a drive along the highway a primary reason for their trip" (60 FR 26759–26762). In addition to meeting intrinsic quality criteria, a corridor management plan developed with community input must be prepared for the scenic corridor and submitted for review during the nomination process. As one of 14 necessary components, a strategy describing how new development might be accommodated while still preserving the intrinsic qualities of the corridor must be included in the corridor management plan (60 FR 26759–26762). Once designated, funding for improvements to the scenic byway to enhance access and visitation to the area through a grant application process is made available to the state in which the scenic byway is located.

In the project study area, the approximately 10-mile-long segment of I-5 between US-97 near Weed and SR-89 is part of the Volcanic Legacy Scenic Byway (FHWA 2016b). Designated as an All-American Road by the FHWA and recognized by Congress in the National Scenic Byways Program, the Volcanic Legacy Scenic Byway encompasses approximately 500 miles of highways from which

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

motorists are afforded views of a dramatic volcanic landscape between Lassen Volcanic National Park in California and Crater Lake National Park in Oregon (FHWA 2016b).

Funding for the National Scenic Byways Program ceased in fall 2013 and the FHWA is no longer soliciting grant applications or Scenic Byway/All-American Road designations (FHWA 2016a).

State

Caltrans Scenic Highway Program

In 1963, the California Legislature created the Scenic Highway Program to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways. The state regulations and guidelines governing the Scenic Highway Program are found in Section 260 et seq. of the Streets and Highways Code. A highway may be designated as scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the travelers' enjoyment of the view (Caltrans 2008). A state route must be included on the list of highways eligible for scenic highway designation in Streets and Highways Code Section 263 for it to be nominated for official designation (eligible state routes are those that have been listed in Section 263 by the State Legislature). The application to nominate eligible scenic highways for official designation requires the preparation of a visual assessment and a scenic highway proposal. The proposal must include a letter of intent from the local governing body, topographic and zoning maps, and a narrative description of the scenic elements in the corridor that includes a discussion of any visual intrusions on scenic views (Caltrans 2008). In addition, the local governing body must also develop, adopt, and submit to Caltrans for review and approval a corridor protection program composed of protection measures in the form of protective ordinances, zoning, and/or planning policies that apply to the area of land within the scenic corridor (Caltrans 2008).

In the proposed project area, the approximately 10-mile-long segment of I-5 between US-97 near Weed and SR-89 near the City of Mount Shasta is listed in Section 263 of the Streets and Highways Code and as such is an eligible state scenic highway (Caltrans 2016).

Regional/Local

Siskiyou County General Plan

The Siskiyou County General Plan includes goals, objectives, and policies relevant to aesthetics and visual resources in the Scenic Highways Element and the Energy Element. Scenic routes and the principles of the scenic route system and scenic route corridor are also addressed in the Scenic Highways Element.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Scenic Highways Element

The Scenic Highways Element identifies three types of scenic routes: (1) scenic freeways, (2) scenic highways, and (3) scenic rural routes (Siskiyou County Planning Department 1974). From its confluence with US-97 in Weed to its confluence with SR-89 south of Mount Shasta, I-5 is a County-designated scenic freeway. The overarching principle of the County's scenic route system is to "provide attractive and efficient links between recreational and cultural centers, while providing a variety of experiences and views giving uninterrupted movement of pleasure driving" (Siskiyou County Planning Department 1974). To protect the visual quality along scenic route corridors, the County adopted the following principles, which are applicable to the proposed project:

1. Provide for normal use of the land and protect against unsightly features.
2. Locate transmission lines and towers outside of Scenic Corridors when feasible.
3. Establish architectural and site design review by the appropriate local jurisdiction.
4. Use landscaping to increase scenic qualities (Siskiyou County Planning Department 1974, Principle C: The Scenic Route Corridor).

In addition to the above-listed principles, the following Scenic Highways Element objectives concern the protection of scenic views from scenic routes and as such are considered applicable to the proposed project:

Objective 2. To conserve, enhance, and protect scenic views observable from scenic routes without unduly restricting the primary use of the lands involved.

Objective 4. To preserve for all travelers the outstanding characteristics of Siskiyou County, primarily clean air and magnificent scenery, so that it may so remain, providing incentives for tourism, and to stabilize and increase property values and the economy of Siskiyou County (Siskiyou County Planning Department 1974, III: Objectives).

Energy Element

Because they address energy facilities and County scenery, the following goals, policies, and implementation measures are applicable to the proposed project:

32. In the absence of compelling or contravening considerations, energy facilities should not be sited in sensitive natural resources areas, including: unstable geologic or soil areas; floodplains; wetlands; habitat of fish or wildlife species of rare, threatened, endangered, or special concern status; known paleontological, archaeological, ethnographic, or

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

historical sites; or designated scenic areas. If siting in such areas is unavoidable, it shall be limited to the smallest possible portion of the energy facility in question, and shall be mitigated in accordance with CEQA.

33. Wherever possible, increased demand for energy transmission shall be accommodated with existing transmission facilities. Where new capacity is necessary, priority shall be given to upgrading or reconstruction of existing facilities, followed by new construction along existing transmission or other utility corridors. Any new transmission facilities shall be sited so as to minimize interference with surrounding land-uses, and in ways that minimize their visual impacts (Siskiyou County Planning Department 1993, Energy Facilities, Policies).

- K.3. The siting of transmission lines shall avoid interfering with scenic views, and shall be visually integrated with the surrounding setting to the greatest extent possible. Applicable visual mitigations include, but are not limited to avoiding ridgelines or other visually prominent features, and using non-glare towers and non-specular lines which more readily blend into the natural landscape (Siskiyou County Planning Department 1993, Zoning Ordinance, Implementation Measures).

City of Mount Shasta General Plan

The following goals, policies, and implementation measures pertain to the protection of scenic resources within and outside the City of Mount Shasta city limits and therefore are applicable to the proposed project:

Open Space/Conservation Element

Goal OC-7: Protect the scenic resources of the Mt. Shasta area.

Policy OC-7.1: Promote the protection of the scenic beauty of the Mt. Shasta area through appropriate zoning, development standards, and the development review process involving lands in both the City and outside the city limits. The County is encouraged to support and help implement this policy.

Implementation Measures:

OC-7.1(a): Locate new development outside of scenic vistas and off of prominent slope exposures and ridge lines, except when land in such areas is specifically zoned and planned for development, in which case special design standards shall be required to reduce visual impacts.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- OC-7.1(c):** Establish and enforce standards for outdoor lighting to reduce light pollution.
- OC-7.1(d):** Require undergrounding of all new utilities wherever practical. Encourage other agencies and entities to underground their facilities. Where undergrounding is impractical, aboveground lines shall be located to minimize impacts on sensitive scenic areas (City of Mt. Shasta Planning Department 2007, Scenic Resources).

5.1.3 Applicant Proposed Measures

Applicant proposed measures that would directly address construction and/or operational aesthetic impacts have not been proposed.

5.1.4 Environmental Impacts and Mitigation

a) *Would the project have a substantial adverse effect on a scenic vista?*

Less Than Significant Impact. The Siskiyou County General Plan and City of Mount Shasta General Plan do not formally designate scenic vistas. However, the proposed project is located in a volcanic landscape featuring significant scenic features, including the “glacial-carved features” of Mount Shasta, Mount Eddy and the Eddy Range, Black Butte, and densely forested hills and mountains. Therefore, scenic vistas do occur from viewpoints in the project area, and clear to partially obstructed views to features of significant aesthetic value are available to residents and motorists.

As described in more detail in Section 5.1.4(b), views of volcanic and mountainous terrain including Mount Shasta, Mount Eddy, and Black Butte are available from I-5 as motorists and passengers pass through the project area. Additional viewers in the project area who are afforded views of these prominent landscape features include motorists on local public roads, including North and South Old Stage Road, West Ream Avenue, West A Barr Road, Hatchery Lane, West Jesse Street, and Michele Drive. The proposed project primarily entails reconductoring an existing distribution line and replacing existing distribution line support poles, and aboveground electrical infrastructure is present in existing views from I-5 and local public roads. For example, an existing distribution line and associated support poles are aligned along the eastern right-of-way of North Old Stage Road and several dark-colored horizontal conductor wires and tall wooden support poles are present in the foreground of existing views toward Mount Shasta. Similarly, transmission and distribution lines and support poles run parallel and perpendicular to Hatchery Lane and are present in the existing views

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

toward Mount Shasta, northern views towards Black Butte, and western views toward Mount Eddy available to eastbound motorists.

As described in more detail in Section 5.1.4(b), implementation of the proposed project would not substantially affect existing scenic views available from I-5 through the project area. Due to the presence of tall coniferous trees immediately west of I-5, project components would be screened from view along the interstate between West Ream Avenue and West Lake Street. North of West Lake Street, interstate-adjacent trees are less dense and tend to display a shorter form, which provides for briefly experienced viewing corridors to project distribution and transmission lines. Although interstate motorists and passengers traveling through the Mount Shasta area at approximately 65 miles per hour would experience brief views of proposed project components, electrical transmission and distribution infrastructure displaying similar -tall forms and vertical and horizontal lines are present in existing views from northbound and southbound I-5. The addition of conductor wires and introduction of taller support poles along the existing distribution alignment located in the foreground viewing distance would create more readily noticeable line contrast; however, these features would be backscreened by dark coniferous forest and would not generally rise above the existing tree line. As such, additional conductor wires and replacement support poles would not substantially obstruct or screen from view densely forested hilly and mountainous terrain in the middleground to background viewing distance. These features would not dominate views as motorists and passengers pass through the scenic Mount Shasta area landscape. Because views of the new conductor wire and replacement support poles would be experienced briefly and these features would be backscreened by mature coniferous trees, project components would not substantially obstruct or interrupt available views of Mount Eddy.

In addition, project components would not result in a substantially adverse effect to existing views of Mount Shasta and Black Butte available from I-5. New support poles and conductor lines associated with the proposed distribution line that would run from Pine Street northeast to Ski Village Drive would generally be screened from view of I-5 motorists by dense, mature stands of interstate-adjacent trees. As such, existing available views to Mount Shasta would not be substantially affected. In addition, the proposed project would not include the introduction of new conductor lines or other linear features that would span I-5 such that existing views to Black Butte available to northbound motorists and passengers would be substantially interrupted or obstructed. Therefore, implementation of the proposed project would result in **less than significant** impacts to scenic vistas available on I-5.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

For similar reasons as described above, implementation of the proposed project would result in less than significant impacts on scenic vistas available on local public roadways. For example, in views from eastbound West Ream Avenue, the introduction of additional conductor wires and taller replacement poles along South Old Stage Road would be noticeable to motorists and passengers and would include slightly greater line contrast when compared to existing electrical distribution infrastructure; however, these foreground features would not be visually prominent. Rather, conductor wires and replacement poles would generally be backscreened by tall, dark coniferous forest and due to sheer dominance in form and scale, Mount Shasta would continue to command the attention of motorists and passengers as they travel eastbound on West Ream Avenue. Implementation of the proposed project would slightly enhance views from South Old Stage Road toward Mount Shasta. As part of the proposed project, PacifiCorp would remove the existing South Old Stage Road-adjacent Mount Shasta Substation from service (all existing components would be removed but the substation yard would be used for storage of support poles and other infrastructure) and would construct the proposed Lassen Substation a greater distance from the roadway. As a result, substation components would be less visually prominent due to a perceived reduction in scale as viewed from South Old Stage Road. As such, implementation of the proposed project would result in **less than significant** impacts to scenic vistas available from local public roads in the project area.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- b) *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Less Than Significant Impact. Although not an officially designated state scenic highway, the stretch of I-5 through the project area is eligible for state scenic designation. According to the FHWA, Siskiyou County, and the City of Mount Shasta, I-5 through the project area also affords motorists views of scenic resources of significant aesthetic value, including Mount Shasta, Mount Eddy, and Black Butte. Although not officially designated, the I-5 viewshed contains scenic resources, and development projects occurring within the viewshed could potentially affect plans of the County and/or City to seek official state scenic designation for the segment of I-5 within their jurisdiction. Therefore, for purposes of disclosure and consideration of future official scenic designation efforts, potential impacts to existing views from I-5 resulting from implementation of the proposed project are analyzed in this section.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Proposed reconductoring of the existing distribution line located west of I-5 would be visible to north- and southbound I-5 motorists. Under existing conditions, the distribution line and wooden support poles are visible to motorists in westerly views toward Mount Eddy and the Eddy Range and are located within 0.25 miles of the interstate. Regularly spaced thin wooden poles and largely horizontal conductor wire are backscreened by tall, dark, and dense coniferous forest, and existing infrastructure does not substantially obstruct or interrupt views of mountainous terrain in the middleground and background viewing distance. Under proposed conditions, existing wooden support poles would be replaced (new poles would display a similarly narrow width but a ~~slightly~~ greater height) and additional horizontal conductor wires would be strung between poles, increasing the visible line contrast in the foreground viewing distance. Despite the increased horizontal line contrast, the visual effects of the proposed project would be experienced briefly as motorists pass through the area and would be tempered by the presence of existing electrical distribution infrastructure that contributes to the existing character and quality of westerly views from the interstate. In addition, reconductoring of the existing distribution line and the introduction of new support poles would not damage scenic resources such as trees, rock outcroppings, and historic buildings within a state scenic highway. New poles would generally be installed in the same general area as existing poles. As such, scenic highway impacts associated with distribution reconductoring, including the introduction of addition conductor wire and increasing the height of existing support poles, would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- c) *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

Less Than Significant Impact. To assist in the visual character analysis, three viewpoints in the project area from which views of proposed project components would be available were selected. The three viewpoints are representative of available public views to project components in the project area and consider the views of sensitive receptors in the area. The viewpoints also reflect the various distances, viewing angles, and visibility conditions at locations from which sensitive receptors would view project components. To that end, the existing landscape setting as viewed from each viewpoint was documented and photographed and visual simulations of proposed project components were prepared. The visual simulations depict the anticipated visual change associated with implementation of the proposed project, and along with photographs of the existing landscape setting, present a before-and-after view of existing and proposed

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

conditions. Visual simulations were prepared by Power Engineers Inc. and the visual simulation preparation process is documented in detail in PacifiCorp's Proponent's Environmental Assessment (PacifiCorp 2015).

The locations of the three representative viewpoints considered in this analysis are shown on Figure 5.1-5, Viewpoint Locations. The view orientation of each viewpoint is also depicted in the figure, as is the location of the proposed project components. The discussion in this section examines existing and proposed conditions at each of the three viewpoints; characterizes the anticipated visual change as low, moderate, or high; and includes a determination of significance.

Viewpoint 1 – Old Stage Road

Viewpoint 1 is on northbound Old Stage Road, approximately 0.5 miles north of West Ream Avenue, and the view orientation is to the northeast, toward the existing Mount Shasta Substation and the proposed Lassen Substation (see Figure 5.1-6, Viewpoint 1: Old Stage Road). Viewpoint 1 is representative of views available to passing motorists on local surface roads and project area residents located within the immediate foreground (i.e., within 500 feet) to foreground (i.e., 500 feet to 0.25 miles) distance of the existing Mount Shasta Substation and the proposed Lassen Substation.

The snow-covered slopes of Mount Shasta and the conical form of Black Butte are visible in the background viewing distance. As depicted on Figure 5.1-6, vertical and horizontal wooden beams composing substation support racks; thin, busy wiring; and grayish and off-white rectangular cabinets and transformers within the chain-link-fenced Mount Shasta Substation are visible in the foreground and produce a jumbled visual experience. Although these components do not substantially block views of Black Butte, they do tend to distract views and offer competing vertical elements of interest. Existing transmission and distribution lines and wooden support poles are also visible and are either backscreened by tall pine trees or silhouetted against the sky. Tall, dark-green coniferous forest and spreading riparian scrub vegetation is visible beyond the substation fence and distribution and transmission infrastructure.

As proposed, the existing Mount Shasta Substation would be disassembled and removed and the proposed Lassen Substation would be constructed approximately 350 feet to the east. Substation infrastructure would be removed from the existing site, but the perimeter chain-link fence and gravel surface would be maintained. The site would be used by PacifiCorp as an equipment storage yard (while difficult to detect due to poles being laid on the ground, the storage of wooden support poles and other equipment is depicted on

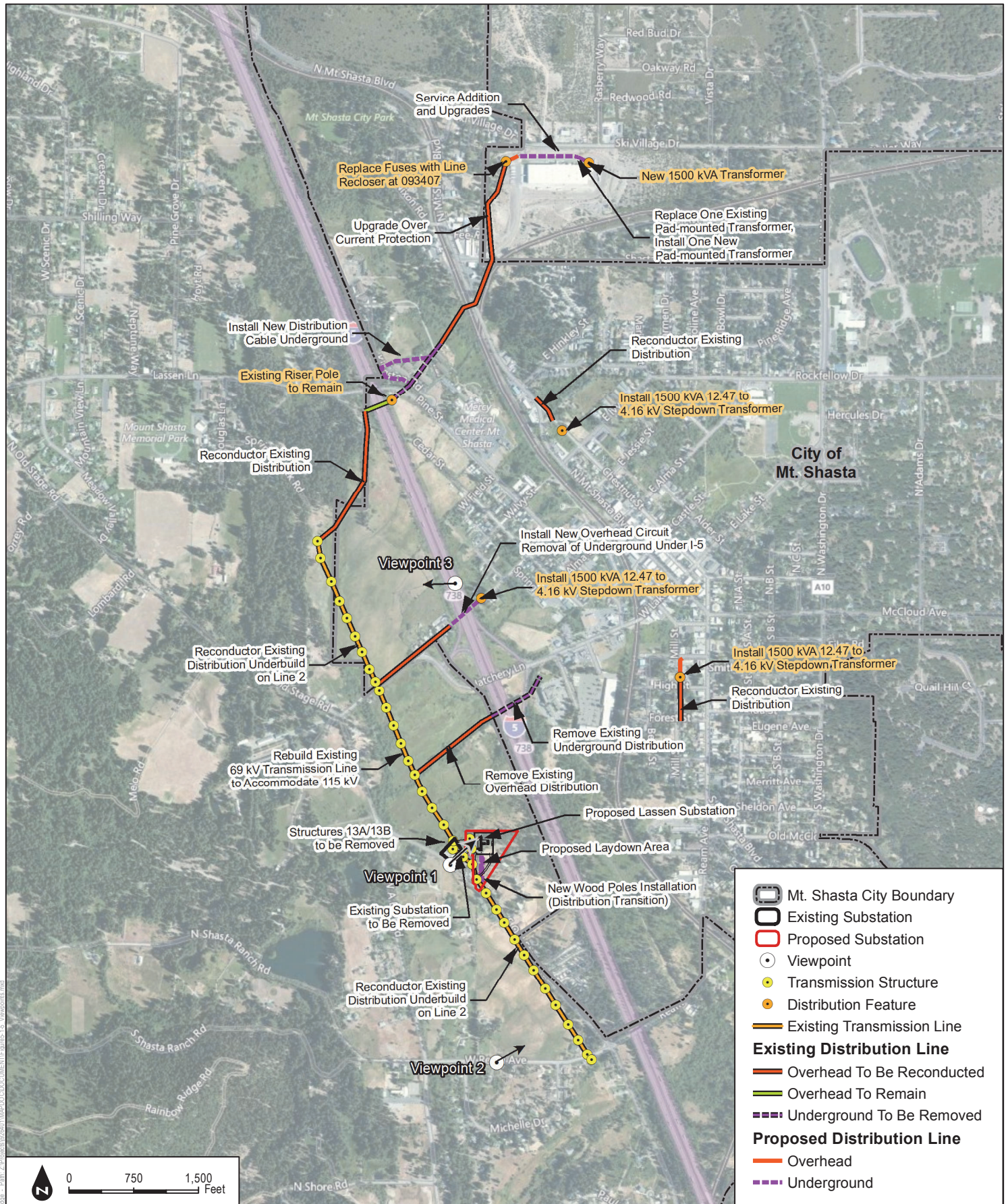
Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Figure 5.1-6). The flat grayish graveled surface of the existing substation site would continue to create color contrast with the green, yellow, and brown color palette displayed by area vegetation and terrain; however, the removal of existing substation racks and infrastructure would create a less jumbled scene and would improve the quality of views toward Black Butte.

In regard to the proposed Lassen Substation, the light grayish tones and simple horizontal and vertical lines displayed by substation infrastructure would be distinct when viewed against dark-green coniferous forest vegetation. However, constructing the substation farther away from Old Stage Road (the substation would be located approximately 375 feet away) would reduce the apparent scale of this feature in the landscape. As a result, substation components would not be visually prominent and would not rise above the dark ridgeline of mountainous terrain in the middleground distance. In regard to electrical distribution and transmission infrastructure, replacement wooden support poles would be ~~slightly~~ taller than existing poles (additional conductor wires would also be strung between poles) but similar to existing infrastructure present in views. These features would contribute ~~similar~~ vertical forms (and thin horizontal lines to the visual environment) ~~as existing infrastructure present in views~~. Lastly, the new wooden angle-support pole to be installed just outside the fence line of the Lassen Substation would be located in line with the Mount Shasta summit as viewed from Viewpoint 1. Despite this line-of-sight obstruction, the rugged ridgeline and slopes of the mountain would remain visible and views of the new pole would be experienced briefly by passing motorists. Therefore, because implementation of the proposed project would represent moderate visual change and would enhance the quality of existing views, impacts to existing visual character and quality would be **less than significant**.

Viewpoint 2 – West Ream Avenue

Viewpoint 2 is situated on eastbound West Ream Avenue, approximately 0.3 miles west of Old Stage Road. The view orientation is to the northeast, across a low golden meadow and toward the existing transmission line installed along Old Stage Road (see Figure 5.1-7, Viewpoint 2: West Ream Avenue). Viewpoint 2 is representative of views available to passing motorists on local surface roads and project area residents located within the middleground (i.e., 0.25-mile to 0.75-mile) distance of the existing 69 kilovolt (kV) transmission line.



SOURCE: Bing Maps (2016); PacifiCorp (2015)

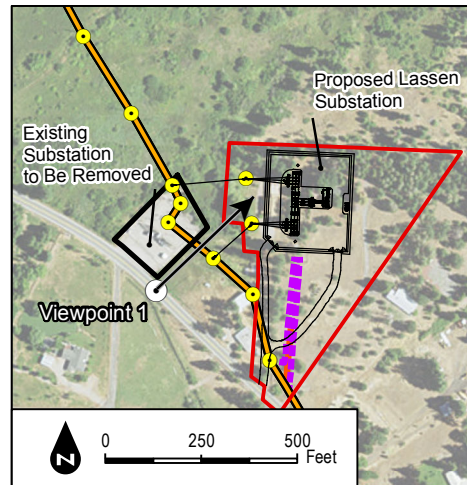
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Lassen Substation Project

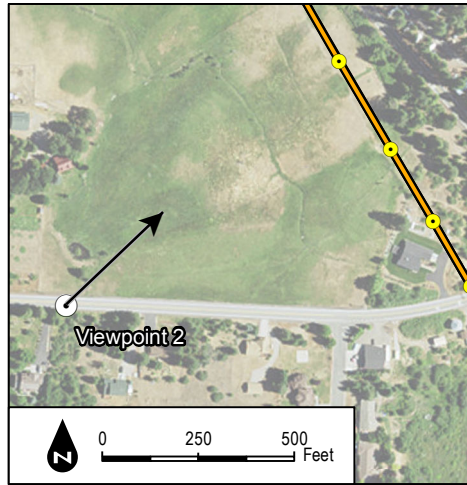
FIGURE 5.1-5
Viewpoint Locations

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Existing



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As shown on Figure 5.1-7, the low golden grasses of the foreground meadow in the landscape abruptly give way to tall, dark-green coniferous forest east of Old Stage Road. The rectangular form and tan and blue exteriors of mobile homes within the Chateau Shasta Mobile Home Park are noticeable but partially obstructed by vegetation. The dark silhouette of a prominent (and forested) hill located east of the City of Mount Shasta is visible and the rugged, noticeably steep slopes of Mount Shasta are dominant features in the scene. Existing transmission line support poles are visible but because of their thin vertical form and due to distance, the structures are not visually prominent when viewed from Viewpoint 2. Lastly, the thin horizontal line of conductor lines strung between support poles is difficult to detect when viewed against the dense cluster of dark-green pine trees.

Upon project implementation, existing wooden support poles installed along Old Stage Road would be replaced with slightly taller wooden support poles and additional conductor lines would be strung on the replacement poles. As viewed from Viewpoint 2, the replacement poles would display a thin vertical profile similar to the existing poles and the increased structure height would not substantially alter existing views or create noticeably substantially stronger line contrast. The additional conductor lines installed on transmission structures would slightly increase line contrast due to the introduction of multiple horizontal and slightly concave lines. Furthermore, as shown on Figure 5.1-7, the new conductor lines would be more visible than existing line (the diameter of the new 795 thousand circular mil (kcmil) aluminum conductor steel-reinforced cable (ACSR) conductor lines is greater than that of existing conductor lines), but the increased visibility of these features would not substantially alter the existing quality of the view or the character of the visible landscape. Views of Mount Shasta would also not be obstructed or substantially altered due to implementation of the proposed project. Overall visual contrast and change associated with the proposed project would be low/weak and impacts would be **less than significant**.

Viewpoint 3 – I-5

Viewpoint 3 is on northbound I-5, approximately 0.35 miles north of the West Lake Street Overpass. View orientation is to the west, across interstate travel lanes, adjacent riparian scrub vegetation, and a low meadow landscape toward the existing transmission line, which is approximately 0.25 miles away (see Figure 5.1-8, Viewpoint 3: I-5). A dense stand of tall, dark-green forest is located beyond the transmission line and coniferous-forest-covered hills are located in the middleground distance. The rolling, relatively flat ridgeline of a topographical saddle located south of Mount Eddy is visible in the background. Viewpoint 3 is representative of views available to passing I-5

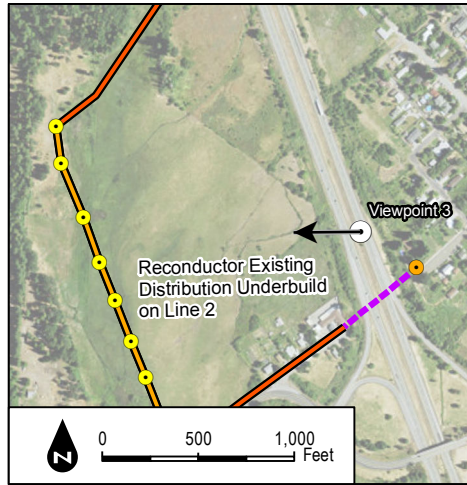
Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

motorists and project area residents located within the middleground (i.e., 0.25-mile to 0.75-mile) distance of the existing 69 kV transmission line.

As shown on Figure 5.1-8, existing wooden support poles and conductor lines are visible in westerly views from I-5. More than the support poles, the horizontal line and color displayed by conductor lines contrast with the vertical form and dark-green color of coniferous forest vegetation. Support poles tend to replicate the tall form and thin line displayed by backscreening pine trees and as a result, these features tend to recede into existing landscape features. Implementation of the proposed project and the installation of taller replacement poles would create negligible visual change and negligible form and line contrast as viewed from Viewpoint 3. The stringing of new (and additional) conductor lines would result in increased line contrast; however, because these features are currently present in the landscape, the overall visual change would be incremental and would not substantially affect the quality of existing views. Visual contrast would be weak/low and would be experienced briefly by motorists passing through the area at 65 miles per hour. Therefore, impacts to existing visual quality and character associated with the proposed project as viewed from Viewpoint 3 would be **less than significant**.

Because the existing visual character and quality of available views in the project area has been influenced by existing substation facilities and transmission and distribution infrastructure displaying ~~similar scale, form, line, and color as~~ similar to the proposed project components, the existing visual character and quality of the project area would not be substantially degraded by implementation of the proposed project. Although proposed replacement poles would be approximately 25 feet taller than existing poles, 50- to 60-foot-tall poles are existing features in the landscape and are a routine presence in existing views of the area. Further, replacement poles would be installed at or near the location of existing poles and would thus avoid the introduction of substantially new forms and lines to the landscape. Demolition of the existing substation, construction of the new substation approximately 375 feet to the east, and modification of existing overhead distribution and transmission lines would result in ~~overall~~ moderately low visual change ~~and contrast and that~~ would generally occur where these substation and distribution and transmission line features currently exist in the landscape. Therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.



Existing



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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less Than Significant Impact. In addition to construction activities, routine operations and maintenance work associated with the proposed project would occur during daytime hours and temporary, mobile nighttime lighting would not be required. Although the proposed Lassen Substation would require the introduction of new lighting for security purposes, lighting would be minimal and would be directed downward to minimize potential skyglow and light trespass onto adjacent properties. In addition, lighting would be motion-sensor controlled and would normally be turned off unless maintenance personnel were to access the substation during emergencies that may occasionally occur. During emergencies necessitating nighttime work, use of mobile lighting sources would be required but would be temporary and focused onto work areas, as opposed to directed toward motorists or residences in the surrounding area. Proposed transmission line upgrades would include the replacement of existing wooden poles with new wooden poles and would not require permanent lighting, and the wooden poles would not generate glare. With the exception of maintenance vehicles accessing the site during nighttime hours, no additional sources of permanent or temporary nighttime lighting or glare are anticipated during operation of the proposed Lassen Substation. Therefore, because permanent lighting introduced at the substation facility would be limited to that required for security and safety (and would be motion-sensor controlled), and because lighting used during nighttime emergencies would be directed downward and operated only on an emergency basis, impacts would be **less than significant** and no mitigation is required.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

5.1.5 References Cited

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.2 Agriculture and Forestry Resources

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| AGRICULTURE AND FORESTRY RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project: | | | | |
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.2.1 Environmental Setting

The project site is within the City of Mount Shasta (City) and unincorporated Siskiyou County (County) and land uses are therefore governed by the City General Plan and the County General Plan. The site of the proposed substation is within the city limits of the City of Mount Shasta, while the overhead and underground distribution lines proposed for upgrades extend into unincorporated Siskiyou County in several locations (Figure 4-2, Project Overview). Land uses surrounding the proposed Lassen Substation and the Line 2 alignment consist primarily of rural residential, agricultural, and undeveloped land, while land uses surrounding the proposed distribution line upgrades consist of a variety of uses including rural and urban residential, Interstate 5, commercial and office buildings, light industrial uses, and a hotel and senior housing community.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The site of the proposed new substation is within an area designated as Farmland of Local Importance by the Farmland Mapping and Monitoring Program (FMMP). The Line 2 Alignment and proposed distribution upgrade areas traverse areas designated by the FMMP as Other Land, Farmland of Local Importance, and Urban and Built-Up Land. The proposed project would not occur within any areas designated by the State of California as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (CDOC 2014). No Williamson Act lands occur within the project footprint (CDOC 2016).

Forest Land and Timberland

No lands within the City of Mount Shasta with zoning designations for forest land, timberland, or timberland zoned Timberland Production occur within the footprint of the proposed project (City of Mount Shasta 2015). The Siskiyou County General Plan applies general woodland productivity suitability ratings to areas of the County based on soil types mapped within the County. Although the Woodland Productivity map is low resolution and general in nature, the area around the portions of the project within Siskiyou County, including the Line 2 alignment and the existing and proposed substations, appear to be assigned High and Moderate suitability ratings (Siskiyou County 1980). However, according to the Siskiyou County Code, no County lands formally zoned forest land, timberland, or timberland zoned Timberland Production occur within the project footprint (Siskiyou County 1961). County lands traversed by the power line alignment and the existing substation and proposed substation sites are within the following zone districts: Multiple-Family Residential (RES-4), Neighborhood Commercial (C-U), Rural Residential Agricultural (R-R), Non-Prime Agricultural (AG-2), and Planned Development (P-D) zoning. The site of the proposed substation is within the Rural Residential Agricultural (RR) zoning district, which allows for rural residential uses mixed with commercial agricultural uses and allows for public utility uses with approval of a conditional use permit (Siskiyou County 2016). Utility uses do not conflict with any zoning assigned to lands traversed by the proposed project and no forest land, timberland, or timberland zoned Timberland Production occur within the footprint of the proposed project.

5.2.2 Regulatory Setting

Federal

There are no applicable federal regulations or policies related to agriculture and forestry resources for the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

State

California Department of Conservation's Farmland Mapping and Monitoring Program

The California Department of Conservation's FMMP produces maps and statistical data used to monitor the conversion of the state's farmland to and from agricultural use. Every 2 years the maps are updated using data obtained from aerial photographs, public review, and field reconnaissance. The FMMP is an informational service only and does not have regulatory jurisdiction over local land use decisions. For the purpose of this environmental analysis and consistency with the Farmland Policy Act of 1981, the term "Farmland" includes Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, and any conversion of land within these categories is typically considered to be an adverse impact.

Descriptions of the FMMP Farmland categories are provided below.

Prime Farmland

Prime Farmland has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Prime Farmland must have been used for irrigated agriculture production at some time during the 4 years prior to the FMMP mapping date.

Farmland of Statewide Importance

Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. In addition, to be considered, lands must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

Unique Farmland

Unique Farmland consists of lands supporting lesser-quality soils used for the production of the state's leading agricultural crops. Lands are usually irrigated but may also include non-irrigated orchards or vineyards. Lastly, to be considered, lands must have been cropped at some time during the 4 years prior to the mapping date.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) (California Government Code Sections 51200–51297.4, as amended), enables local governments to enter into rolling 10-year contracts with private landowners to restrict specific parcels of land

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

to agricultural or related open-space use. In return for their commitment, landowners receive property tax assessments based on farming and open space uses rather than other potentially higher tax bases. In August 1998, the Williamson Act was amended to establish Farmland Security Zones that grant greater tax reductions for property owners in return for 20-year contract commitments. Siskiyou County participates in the Williamson Act and Farmland Security Zone programs. It is relevant to note that under California Government Code Section 51238, electrical utility facilities are a compatible use on lands under a Williamson Act contract.

Forest Land and Timberland

California Public Resources Code Section 12220(g) defines “Forest land” as “land that can support 10% native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.” In turn, “timberland” is defined by California Public Resources Code Section 4526 as “land, other than land owned by the federal government, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.” Finally, “Timberland production zone,” or “TPZ,” is defined by California Government Code Section 51104(g) as “an area which has been zoned pursuant to [Government Code] Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, ‘timberland preserve zone’ means ‘timberland production zone.’”

Local

Siskiyou County General Plan and County Zoning Ordinance

The Siskiyou County General Plan includes overlays that identify constraints to development, including constraints associated with soils that indicate woodland productivity potential. County zoning identifies allowable uses within zone districts established for all County lands.

City of Mount Shasta General Plan and Zoning Ordinance

The City of Mount Shasta General Plan assigns land use designations to all lands within the City’s limits and specifies allowable land uses within each designation. This includes land use designations for a variety of uses, including forestry and agricultural uses, which are accommodated within Resource or Agriculture land use designations. The City’s Municipal Code assigns zone districts to all areas of the City and establishes allowable land uses and development standards within each district.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.2.3 Applicant Proposed Measures

No applicant proposed measures have been proposed for or apply to agriculture and forestry resources.

5.2.4 Environmental Impacts and Mitigation

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

No Impact. The proposed new substation represents the area of greatest permanent disturbance associated with the proposed project and is located within an area designated as Farmland of Local Importance. The Line 2 alignment and proposed distribution upgrade areas traverse areas designated by the FMMP as Other Land, Farmland of Local Importance, and Urban and Built-Up Land. The proposed project would not occur within any areas designated by the State of California as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (CDOC 2014). Since these state-designated Farmland types are not mapped within the potential project disturbance area, no impacts to these types of Farmland would result from implementation of the proposed project.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. Portions of the proposed project within the City of Mount Shasta city limits are within the following zone districts: Unclassified, General Commercial, Downtown Commercial, Low Density Residential, and High Density Residential. The portion of the proposed project traversing Siskiyou County lands is within the following zone districts: Multiple-Family Residential (RES-4), Neighborhood Commercial (C-U), Rural Residential Agricultural (R-R), Non-Prime Agricultural (AG-2), and Planned Development (P-D) zoning. The site of the proposed substation is within the Rural Residential Agricultural (RR) zoning district, which allows for rural residential uses mixed with commercial agricultural uses and allows for public utility uses with approval of a conditional use permit (Siskiyou County 2016). With approval of a conditional use permit, utility uses would not conflict with any zoning assigned to lands traversed by the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Upgrades to Line 2 and distribution line upgrades are within existing utility easement rights-of-way and would result in no conflict with existing zoning assigned to the project footprint. The project would result in no change to the existing land use within the utility rights-of-way.

No lands under a Williamson Act contract occur within the project footprint, so the project would result in no conflicts with uses specified by a Williamson Act contract. It may be useful to note that California Government Code Section 51238 states that electrical utility facilities are a compatible use on lands under a Williamson Act contract.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

No Impact. No lands within the City of Mount Shasta or Siskiyou County with zoning designations for forest land, timberland, or timberland zoned Timberland Production occur within the footprint of the proposed project. No conflict with zoning for forest land or timberland production would occur with implementation of the proposed project.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

Less Than Significant Impact. The proposed new substation site and new right-of-way are within an area of rural residential development, and the subject parcels are zoned for and developed with rural residential uses, including residential structures and outbuildings. The parcels are not heavily forested; however, the northern portion of the work area supports a stand of trees, though it is discontinuous with surrounding forested land. The site is zoned for rural residential uses and the proposed project would result in the removal of trees from approximately 2.1 acres within the proposed substation site, which is not currently devoted to timber production or dedicated for forestry or timber uses by applicable zoning or land use designations. The proposed Line 2 and distribution line upgrades would be within existing rights-of-way and would result in no change in land use. The removal of trees associated with the proposed project would represent a less than significant impact associated with loss or conversion of forest land because the project site is zoned for rural residential uses.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

No Impact. The project involves no other changes in the existing environment or zoning or land use designations that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. The project site is zoned for a variety of non-agricultural uses, the site consists primarily of existing rights-of-way, and the proposed substation site is within a site previously developed with rural agricultural uses.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

5.2.5 References Cited

California Government Code, Sections 51100–51104. California Timberland Productivity Act of 1982.

California Government Code, Sections 51200–51207. California Land Conservation Act of 1965 (Williamson Act).

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City of Mount Shasta. 2015. City of Mount Shasta Zoning [map]. Accessed August 30, 2016. <http://mtshastaca.gov/wp/wp-content/uploads/2016/01/ZoningMap.pdf>.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Siskiyou County. 2016. Rural Residential Agricultural (RR) zoning and public utilities. Telephone conversation with P. Piemme (Siskiyou County Planning Department). August 30, 2016.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.3 AIR QUALITY

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|-------------------------------------|-------------------------------------|
| AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

5.3.1 Environmental Setting

The Lassen Substation Project (proposed project) would be in the southern portion of Siskiyou County (County), which is within the Northeast Plateau Air Basin. Within the County, the regulatory agency with authority to regulate air quality is the Siskiyou County Air Pollution Control District (SCAPCD).

Climate and Meteorology

The Northeast Plateau Air Basin is located in the northeast corner of California and covers approximately 14,788 square miles. The air basin is bordered by Oregon to the north and Nevada to the east, and its geographic extent includes Lassen County, Modoc County, and Siskiyou County. Land uses within the air basin are characterized largely by rural and agricultural uses, and this area's populations are primarily concentrated in the cities of Yreka, Mount Shasta, Alturas, and Susanville. The southern and western portions of the air basin include forested mountains typical of this part of the state. Mount Lassen and Mount Shasta are prominent geographic features in the northern part of the Basin (CARB 2010).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

As stated in the Proponent's Environmental Assessment (PEA):

The climate of the Northeast Plateau is dominated by the strength and location of a semi-permanent, subtropical, high-pressure cell over the northeastern Pacific Ocean known as the Eastern Pacific high-pressure cell, with terrain variations creating various microclimates. The existence of mountains and hills within the basin is responsible, in large part, for the wide variations of rainfall, temperatures, and localized winds that occur throughout the region. Due to the position of the Eastern Pacific high-pressure cell, winter storms occur within the study area, and a bulk of the precipitation within the region occurs during this winter storm period. Annual rainfall is lowest in the valleys, higher in the foothills, and highest in the mountains. Weather systems in the region usually result in strong winds and unstable air masses, which lead to increased air dispersion. Dry, warm conditions are characteristic of the summer months, although thunderstorms are not uncommon.

Airflow patterns in the region are predominantly northwesterly in the spring and summer; however, seasonal variations do occur. Regional airflow patterns affect air quality by directing pollutants downwind of sources. Localized meteorological conditions, such as light winds and shallow vertical mixing, as well as topographical features, such as surrounding mountain ranges, create areas of high pollutant concentrations by hindering dispersal (PacifiCorp 2015).

Weather data were derived from the Western Regional Climate Center, including temperature and precipitation information for the Mount Shasta area. Data generated between August 1986 and June 2016 were accessed to determine average weather indicators for the region. According to data collected for Mount Shasta, the average annual maximum temperature over this period was 62.5°F, and the average minimum temperature was 36.7°F. The average total annual precipitation was 39.94 inches, and the average total annual snowfall was 102.9 inches (WRCC 2016).

Attainment Status

Pursuant to the 1990 federal Clean Air Act amendments, the U.S. Environmental Protection Agency EPA classifies air basins (or portions thereof) as “attainment” or “nonattainment” for each criteria air pollutant, based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as “attainment” for that pollutant. If an area exceeds the standard, the area is classified as “nonattainment” for that pollutant. If there are not enough data available to determine whether the standard is exceeded in an area, the area is designated as “unclassified” or “unclassifiable.” The designation of “unclassifiable/attainment” means that the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

area meets the standard or is expected to be meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are re-designated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as “attainment” or “nonattainment,” but based on the California Ambient Air Quality Standards (CAAQS) rather than the NAAQS.

Table 5.3-1 depicts the current attainment status of the project site with respect to the NAAQS and CAAQS. As shown, the Northeast Plateau Air Basin is classified as attainment/unclassified for the NAAQS and CAAQS for all criteria pollutants.

**Table 5.3-1
Federal and State Attainment Classification
Northeast Plateau Air Basin (Siskiyou County)**

| Pollutant | Averaging Time | Designation/Classification |
|---|--|--|
| <i>Federal Standards</i> | | |
| Ozone (O ₃) | 8 hours | Unclassifiable/attainment |
| Nitrogen dioxide (NO ₂) | 1 hour, annual arithmetic mean | Unclassified |
| Carbon monoxide (CO) | 1 hour, 8 hours | Unclassifiable/attainment |
| Sulfur dioxide (SO ₂) | 24 hours, annual arithmetic mean | Unclassified |
| Respirable particulate matter (PM ₁₀) | 24 hours | Unclassifiable/attainment |
| Fine particulate matter (PM _{2.5}) | 24 hours, annual arithmetic mean 24 hours | Unclassifiable/attainment Unclassifiable/attainment |
| Lead (Pb) | Rolling 3-month average | Unclassifiable/attainment |
| <i>State Standards</i> | | |
| Ozone (O ₃) | 1 hour, 8 hours | Attainment |
| Nitrogen dioxide (NO ₂) | 1 hour, annual | Attainment |
| Carbon monoxide (CO) | 1 hour, 8 hours | Unclassified |
| Sulfur dioxide (SO ₂) | 1 hour, 24 hours | Attainment |
| Respirable particulate matter (PM ₁₀) | 24 hours, annual arithmetic mean | Attainment |
| Fine particulate matter (PM _{2.5}) | Annual arithmetic mean | Attainment |
| Lead (Pb) | 30-day average | Attainment |
| Sulfates (SO ₄) | 24 hours | Attainment |
| Hydrogen sulfide (H ₂ S) | 1 hour | Unclassified |
| Visibility-reducing particles | 8 hours (10:00 a.m.–6:00 p.m.) | Unclassified |

Source: CARB 2016a.

Local Ambient Air Quality

The California Air Resources Board (CARB), air districts, and other agencies monitor ambient air quality at approximately 250 air quality monitoring stations across the state. Air quality

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

monitoring stations usually measure pollutant concentrations 10 feet above ground level; therefore, air quality is often referred to in terms of ground-level concentrations. The most recent background ambient air quality data from 2013 to 2015 are presented in Table 5.3-2. The Yreka monitoring station is the nearest air quality monitoring station to the project site. The data collected at this station are considered representative of the air quality experienced in the project vicinity. Air quality data for ozone (O₃), coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) from the Yreka monitoring station are provided in Table 5.3-2. Nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and carbon monoxide (CO) are not measured in the Northeast Plateau Air Basin. The number of days exceeding the ambient air quality standards is also shown in Table 5.3-2.

**Table 5.3-2
Local Ambient Air Quality Data**

| | Ambient Air Quality Standard | 2013 | 2014 | 2015 |
|---|----------------------------------|-------|-------|-------|
| <i>Ozone (O₃) (Yreka Monitoring Station)</i> | | | | |
| Maximum 1-hour concentration (ppm) | 0.09 ppm (state) | 0.077 | 0.082 | 0.076 |
| <i>Number of days exceeding state standard (days)</i> | | 0 | 0 | 0 |
| Maximum 8-hour concentration (ppm) | 0.070 ppm (state) | 0.071 | 0.066 | 0.067 |
| | 0.070 ppm (federal) | 0.071 | 0.065 | 0.066 |
| <i>Number of days exceeding state standard (days)</i> | | 1 | 0 | 0 |
| <i>Number of days exceeding federal standard (days)</i> | | 0 | 0 | 0 |
| <i>Coarse Particulate Matter (PM₁₀) (Yreka Monitoring Station)</i> | | | | |
| Maximum 24-hour concentration (µg/m ³) | 50 µg/m ³ (state) | 50.4 | 82.9 | 59.6 |
| | 150 µg/m ³ (federal) | 54.6 | 90.6 | 65.5 |
| <i>Number of days exceeding state standard (days)</i> | | 0 | 3 | 1 |
| <i>Number of days exceeding federal standard (days)</i> | | 0 | 0 | 0 |
| Annual concentration (state method) (µg/m ³) | 20 µg/m ³ (state) | — | — | 12.9 |
| <i>Fine Particulate Matter (PM_{2.5}) (Yreka Monitoring Station)</i> | | | | |
| Maximum 24-hour concentration (µg/m ³) | 35 µg/m ³ (federal) | 43.5 | 71.9 | 51.0 |
| <i>Number of days exceeding federal standard (days)</i> | | 2 | 2 | 2 |
| Annual concentration (µg/m ³) | 12 µg/m ³ (state) | — | — | — |
| | 12.0 µg/m ³ (federal) | 7.8 | — | — |

Source: CARB 2016b.

Notes: ppm = parts per million by volume; µg/m³ = micrograms per cubic meter.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.3.2 Regulatory Setting

Federal

Criteria Air Pollutants

The federal Clean Air Act, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the Clean Air Act, including setting NAAQS for major air pollutants; setting hazardous air pollutant (HAP) standards; approving state attainment plans; setting motor vehicle emission standards; issuing stationary source emission standards and permits; and establishing acid rain control measures, stratospheric O₃ protection measures, and enforcement provisions. Under the Clean Air Act, NAAQS are established for the following criteria pollutants: O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, and lead.

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The NAAQS (other than for O₃, NO₂, SO₂, PM₁₀, PM_{2.5}, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. NAAQS for O₃, NO₂, SO₂, PM₁₀, and PM_{2.5} are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

Hazardous Air Pollutants

The 1977 federal Clean Air Act amendments required the EPA to identify National Emission Standards for HAPs to protect public health and welfare. HAPs include certain volatile organic compounds (VOCs), pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 federal Clean Air Act Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

State

California Clean Air Act

The California Clean Air Act was adopted in 1988 and establishes the state's air quality goals, planning mechanisms, regulatory strategies, and standards of progress.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Under the federal Clean Air Act, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels. CARB is responsible for ensuring implementation of the California Clean Air Act, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products. Pursuant to the authority granted to it, CARB has established the CAAQS, which are generally more restrictive than the NAAQS. The NAAQS and CAAQS are presented in Table 5.3-3.

**Table 5.3-3
Ambient Air Quality Standards**

| Pollutant | Averaging Time | California Standards ^a | National Standards ^b | |
|--------------------------------|-------------------------|------------------------------------|--|---------------------------------------|
| | | Concentration ^c | Primary ^{c,d} | Secondary ^{c,e} |
| O ₃ | 1 hour | 0.09 ppm (180 µg/m ³) | — | Same as primary standard ^f |
| | 8 hours | 0.070 ppm (137 µg/m ³) | 0.070 ppm (137 µg/m ³) ^f | |
| NO ₂ ^g | 1 hour | 0.18 ppm (339 µg/m ³) | 0.100 ppm (188 µg/m ³) | Same as primary standard |
| | Annual arithmetic mean | 0.030 ppm (57 µg/m ³) | 0.053 ppm (100 µg/m ³) | |
| CO | 1 hour | 20 ppm (23 mg/m ³) | 35 ppm (40 mg/m ³) | None |
| | 8 hours | 9.0 ppm (10 mg/m ³) | 9 ppm (10 mg/m ³) | |
| SO ₂ ^h | 1 hour | 0.25 ppm (655 µg/m ³) | 0.075 ppm (196 µg/m ³) | — |
| | 3 hours | — | — | 0.5 ppm (1,300 µg/m ³) |
| | 24 hours | 0.04 ppm (105 µg/m ³) | 0.14 ppm (for certain areas) ^g | — |
| | Annual | — | 0.030 ppm (for certain areas) ^g | — |
| PM ₁₀ ⁱ | 24 hours | 50 µg/m ³ | 150 µg/m ³ | Same as primary standard |
| | Annual arithmetic mean | 20 µg/m ³ | — | |
| PM _{2.5} ⁱ | 24 hours | — | 35 µg/m ³ | Same as primary standard |
| | Annual arithmetic mean | 12 µg/m ³ | 12.0 µg/m ³ | 15.0 µg/m ³ |
| Lead ^{j,k} | 30-day average | 1.5 µg/m ³ | — | — |
| | Calendar quarter | — | 1.5 µg/m ³ (for certain areas) ^k | Same as primary standard |
| | Rolling 3-month average | — | 0.15 µg/m ³ | |
| Hydrogen sulfide | 1 hour | 0.03 ppm (42 µg/m ³) | — | — |
| Vinyl chloride ^l | 24 hours | 0.01 ppm (26 µg/m ³) | — | — |
| Sulfates | 24 hours | 25 µg/m ³ | — | — |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 5.3-3
Ambient Air Quality Standards**

| Pollutant | Averaging Time | California Standards ^a | National Standards ^b | |
|-------------------------------|--------------------------------------|---|---------------------------------|--------------------------|
| | | Concentration ^c | Primary ^{c,d} | Secondary ^{c,e} |
| Visibility reducing particles | 8 hour (10:00 a.m. to 6:00 p.m. PST) | Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70% | — | — |

Source: CARB 2016c.

Notes: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; CO = carbon monoxide; mg/m^3 = milligrams per cubic meter; NO_2 = nitrogen dioxide; O_3 = ozone; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $\text{PM}_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; ppm = parts per million by volume; SO_2 = sulfur dioxide.

- ^a California standards for O_3 , CO, SO_2 (1-hour and 24-hour), NO_2 , suspended particulate matter (PM_{10} , $\text{PM}_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- ^b National standards (other than O_3 , NO_2 , SO_2 , particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10} , the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above $150 \mu\text{g}/\text{m}^3$ is equal to or less than 1. For $\text{PM}_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.
- ^c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- ^d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.
- ^e National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- ^f On October 1, 2015, the EPA Administrator signed the notice for the final rule to revise the primary and secondary NAAQS for O_3 . The EPA is revising the levels of both standards from 0.075 ppm to 0.070 ppm and retaining their indicators (O_3), forms (fourth-highest daily maximum, averaged across 3 consecutive years) and averaging times (8 hours). The EPA is in the process of submitting the rule for publication in the Federal Register. The final rule will be effective 60 days after the date of publication in the Federal Register. The lowered national 8-hour standards are reflected in the table.
- ^g To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- ^h On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
- ⁱ On December 14, 2012, the national annual $\text{PM}_{2.5}$ primary standard was lowered from $15 \mu\text{g}/\text{m}^3$ to $12.0 \mu\text{g}/\text{m}^3$. The existing national 24-hour $\text{PM}_{2.5}$ standards (primary and secondary) were retained at $35 \mu\text{g}/\text{m}^3$, as was the annual secondary standard of $15 \mu\text{g}/\text{m}^3$. The existing 24-hour PM_{10} standards (primary and secondary) of $150 \mu\text{g}/\text{m}^3$ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.
- ^j CARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- ^k The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard ($1.5 \mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The EPA has transferred a number of responsibilities to the states and, in most cases, regional air quality management districts and air pollution control districts. As previously stated, the Lassen Substation Project would be in the southern portion of Siskiyou County, which is within the Northeast Plateau Air Basin, under the jurisdiction of the SCAPCD.

Toxic Air Contaminants

A toxic air contaminant (TAC) is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. Federal laws use the term “hazardous air pollutants,” or “HAPs,” to refer to the same types of compounds that are referred to as TACs under state law. California regulates TACs primarily through the Tanner Air Toxics Act (Assembly Bill (AB) 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588).

AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC.

Pursuant to AB 2588, existing facilities that emit air pollutants above specified levels were required to (1) prepare a TAC emission inventory plan and report, (2) prepare a risk assessment if TAC emissions were significant, (3) notify the public of significant risk levels, and (4) if health impacts were above specified levels, prepare and implement risk reduction measures.

California Health and Safety Code Section 41700

This section of the Health and Safety Code states that a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property. This section also applies to sources of objectionable odors.

CEQA Guidelines

The State of California has developed guidelines to address the significance of air quality impacts based on Appendix G of the CEQA Guidelines, which provides guidance that a project would have a significant environmental impact if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
4. Expose sensitive receptors to substantial pollutant concentrations.
5. Create objectionable odors affecting a substantial number of people (14 CCR 15000 et seq.).

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or pollution control district may be relied on to determine whether the project would have a significant impact on air quality. Siskiyou County and the SCAPCD have not adopted daily or annual numeric CEQA significance criteria for air quality, and no district-specific air quality plan is currently in place. However, the SCAPCD has adopted daily thresholds as established under SCAPCD Regulation VI – New Source Siting, Rule 6.1 – Construction Permit Standards for Criteria Air Pollutants. Those thresholds indicate that further analysis is required if a source's emissions exceed 2,500 pounds per day for CO and 250 pounds per day for all other criteria pollutants (SCAPCD 2001). These thresholds were used to evaluate the significance of impacts from the proposed project.

5.3.3 Applicant Proposed Measures

The applicant would implement Applicant Proposed Measure (APM) AQ-1 to reduce impacts related to fugitive dust during construction activities:

APM-AQ-1 Construction Pollutant Reduction Measures:

Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:

- Minimize soil disturbance.
- Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site.
- Curtail earthmoving activities on windy days.
- Ensure that the engines of all construction equipment are properly tuned.
- Limit the maximum speed to 15 miles per hour on unpaved surfaces.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- Replant vegetation in disturbed areas as quickly as possible.
- Implement other effective particulate matter control measures, as needed.

Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:

- Use California Air Resources Board-certified construction equipment, where available.
- Use alternative fuel types for construction equipment where feasible.
- Use local building materials.
- Limit construction vehicle idling time.

Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:

- Use California Air Resources Board-certified construction equipment, where available.
- Use alternative fuel types for construction equipment where feasible.
- Use local building materials.
- Limit construction vehicle idling time.

5.3.4 Environmental Impacts and Mitigation

a) ***Would the project conflict with or obstruct implementation of the applicable air quality plan?***

No Impact. The Northeast Plateau Air Basin is classified as attainment/unclassified for all criteria pollutants, as shown in Table 5.3-1. As such, the SCAPCD is not required to provide a plan for attainment of any pollutant for which the basin is nonattainment. Therefore, because no attainment plans or other local air quality plans are currently provided for the purposes of achieving attainment for any pollutant of concern within the Northeast Plateau Air Basin or any other plans currently implemented by the SCAPCD, construction of the proposed project would not conflict with or obstruct implementation of an applicable air quality plan.

Moreover, as shown in Tables 5.3-4 through 5.3-8, the proposed project would not exceed the New Source Review thresholds as established by the SCAPCD; therefore, the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

project would not impede the SCAPCD's ability to maintain its current attainment/unclassified status for all criteria pollutants. As a result, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- b) *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

Less Than Significant Impact. Construction of the proposed project would result in temporary emissions of criteria air pollutants and fugitive dust as a result of soil disturbance and the use of on-site construction equipment, as well as from off-site trucks hauling construction materials to the project site. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Fugitive dust emissions would primarily result from site preparation and road construction activities. Oxides of nitrogen (NO_x) and CO emissions would primarily result from the use of construction equipment and motor vehicles.

The project would include construction of the new Lassen Substation, transmission line upgrades, distribution line upgrades and subterranean cable installation work, and demolition of the existing Mount Shasta Substation following energization of the proposed Lassen Substation. For the purposes of emissions estimates, it was assumed that construction activities would commence in October 2016 and be completed in November 2017, requiring approximately 41 weeks of total construction time. Section 4.6, Construction Activities, of the Project Description provides details regarding the anticipated construction scenario, including equipment fleet, and Section 4.7 of the Project Description identifies the construction schedule, both of which were used to determine maximum daily emissions during construction activities.

The California Emissions Estimator Model (CalEEMod) Version 2013.2.2 was used to estimate emissions generated during construction. To determine the maximum daily emissions that would occur during construction, all phases of construction were analyzed to account for earthwork required; maximum number of worker vehicle trips, water delivery trips, material delivery trips; and construction equipment fleet operation that would be occurring simultaneously during each construction phase. These estimates were entered into the CalEEMod air quality model and the most intense construction activities that would occur on any one day were analyzed, reported, and compared against the SCAPCD's thresholds provided in Regulation VI – New Source Siting, Rule 6.1, to determine significance under CEQA.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The maximum daily emissions for each construction phase are presented in Table 5.3-4 through Table 5.3-8.

**Table 5.3-4
Maximum Daily Construction Emissions – Demolition**

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|------------------------|----------------|-----------------|-------|-----------------|------------------|-------------------|
| | Pounds per Day | | | | | |
| Substation Demolition | | | | | | |
| Heavy equipment | 3.72 | 44.59 | 20.48 | 0.05 | 1.81 | 1.62 |
| Hauling | 0.02 | 0.14 | 0.18 | 0.00 | 0.01 | 0.01 |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.07 | 0.09 | 1.02 | 0.00 | 0.10 | 0.03 |
| Total daily | 3.83 | 44.90 | 21.86 | 0.05 | 1.93 | 1.66 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |

Source: PacifiCorp 2016.

Notes: ROG = reactive organic gas (also known as volatile organic compound (VOC)); NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

Fugitive dust emissions from site preparation, grading, and underground distribution line construction have been based on the total size of the substation site (4.5 acres) for the substation; the total length of the transmission line (approximately 7,000 feet) times 50 feet, for a total of 8 acres; the total length of the distribution line (approximately 1,200 feet); and the size of the existing substation (0.5 acres).

**Table 5.3-5
Maximum Daily Construction Emissions – Lassen Substation Construction**

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|----------------------------|----------------|-----------------|-------|-----------------|------------------|-------------------|
| | Pounds per Day | | | | | |
| Construction Management | | | | | | |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.02 | 0.02 | 0.25 | 0.00 | 0.02 | 0.01 |
| Total daily | 0.04 | 0.10 | 0.43 | 0.00 | 0.03 | 0.01 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Lassen Substation – Survey | | | | | | |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.05 | 0.07 | 0.76 | 0.00 | 0.08 | 0.02 |
| Total daily | 0.07 | 0.15 | 0.94 | 0.00 | 0.09 | 0.02 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Site Preparation/Grading | | | | | | |
| Fugitive dust | — | — | — | — | 2.97 | 1.62 |
| Heavy equipment | 5.26 | 58.65 | 32.58 | 0.06 | 2.58 | 2.37 |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 5.3-5
Maximum Daily Construction Emissions – Lassen Substation Construction**

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|---|-----------------------|-----------------|--------------|-----------------|------------------|-------------------|
| | <i>Pounds per Day</i> | | | | | |
| Worker vehicles | 0.09 | 0.12 | 1.27 | 0.00 | 0.13 | 0.04 |
| Total daily | 5.37 | 58.85 | 34.03 | 0.06 | 5.69 | 4.03 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Material Haul</i> | | | | | | |
| Fugitive dust | — | — | — | — | 0.04 | 0.004 |
| Heavy equipment | 3.24 | 38.28 | 16.73 | 0.03 | 1.67 | 1.53 |
| Worker vehicles | 0.05 | 0.07 | 0.76 | 0.00 | 0.08 | 0.02 |
| Total daily | 3.29 | 38.35 | 17.49 | 0.03 | 1.79 | 1.55 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Access Road Construction</i> | | | | | | |
| Fugitive dust | — | — | — | — | 2.97 | 1.62 |
| Heavy equipment | 3.75 | 40.42 | 23.09 | 0.03 | 1.97 | 1.81 |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.05 | 0.07 | 0.76 | 0.00 | 0.08 | 0.02 |
| Total daily | 3.82 | 40.57 | 24.03 | 0.03 | 5.03 | 3.45 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Concrete Placement and Framework</i> | | | | | | |
| Heavy equipment | 2.18 | 24.59 | 11.71 | 0.03 | 0.91 | 0.84 |
| Construction trucks | 0.02 | 0.07 | 0.15 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.08 | 0.10 | 1.10 | 0.00 | 0.13 | 0.04 |
| Total daily | 2.28 | 24.76 | 12.96 | 0.03 | 1.05 | 0.88 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Steel Installation</i> | | | | | | |
| Heavy equipment | 2.16 | 24.19 | 10.86 | 0.03 | 1.07 | 0.99 |
| Construction trucks | 1.48 | 7.07 | 15.03 | 0.02 | 0.71 | 0.29 |
| Worker vehicles | 0.08 | 0.10 | 1.10 | 0.00 | 0.13 | 0.04 |
| Total daily | 3.72 | 31.36 | 26.99 | 0.05 | 1.91 | 1.32 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Equipment Installation</i> | | | | | | |
| Heavy equipment | 1.13 | 12.90 | 6.36 | 0.01 | 0.65 | 0.60 |
| Construction trucks | 1.48 | 7.07 | 15.03 | 0.02 | 0.71 | 0.29 |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 2.67 | 20.05 | 22.27 | 0.03 | 1.46 | 0.92 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 5.3-5
Maximum Daily Construction Emissions – Lassen Substation Construction**

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|---|-----------------------|-----------------|--------------|-----------------|------------------|-------------------|
| | <i>Pounds per Day</i> | | | | | |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Bus Work</i> | | | | | | |
| Heavy equipment | 1.50 | 12.79 | 7.19 | 0.01 | 0.62 | 0.59 |
| Construction trucks | 0.02 | 0.07 | 0.15 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 1.58 | 12.94 | 8.22 | 0.01 | 0.73 | 0.62 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Testing and Energization</i> | | | | | | |
| Construction trucks | 0.02 | 0.07 | 0.15 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.03 | 0.04 | 0.44 | 0.00 | 0.05 | 0.01 |
| Total daily | 0.05 | 0.11 | 0.59 | 0.00 | 0.06 | 0.02 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Fencing</i> | | | | | | |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Marshalling Yard</i> | | | | | | |
| Worker vehicles | 0.03 | 0.04 | 0.44 | 0.00 | 0.05 | 0.01 |
| Total daily | 0.03 | 0.04 | 0.44 | 0.00 | 0.05 | 0.01 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Right-of-Way Restoration and Cleanup</i> | | | | | | |
| Fugitive dust | — | — | — | — | 2.94 | 1.61 |
| Heavy equipment | 2.58 | 28.78 | 18.28 | 0.03 | 1.22 | 1.12 |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 2.64 | 28.86 | 19.16 | 0.03 | 4.26 | 2.76 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |

Source: PacifiCorp 2016.

Notes: ROG = reactive organic gas (also known as volatile organic compound (VOC)); NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

Fugitive dust emissions from site preparation, grading, and underground distribution line construction have been based on the total size of the substation site (4.5 acres) for the substation; the total length of the transmission line (approximately 7,000 feet) times 50 feet, for a total of 8 acres; the total length of the distribution line (approximately 1,200 feet); and the size of the existing substation (0.5 acres).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.3-6

Maximum Daily Construction Emissions – Transmission/Distribution Line Construction

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|-------------------------------------|----------------|-----------------|-------|-----------------|------------------|-------------------|
| | Pounds per Day | | | | | |
| Construction Management | | | | | | |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.02 | 0.02 | 0.25 | 0.00 | 0.02 | 0.01 |
| Total daily | 0.04 | 0.10 | 0.43 | 0.00 | 0.03 | 0.01 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Survey | | | | | | |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.06 | 0.07 | 0.76 | 0.00 | 0.08 | 0.02 |
| Total daily | 0.08 | 0.15 | 0.94 | 0.00 | 0.09 | 0.02 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Access Road Construction | | | | | | |
| Fugitive dust | — | — | — | — | 2.99 | 1.62 |
| Heavy equipment | 3.75 | 40.42 | 23.09 | 0.03 | 1.97 | 1.81 |
| Construction trucks | 0.02 | 0.08 | 0.18 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.04 | 0.05 | 0.51 | 0.00 | 0.05 | 0.01 |
| Total daily | 3.81 | 40.55 | 23.78 | 0.03 | 5.02 | 3.44 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Auger Holes, Direct Imbed Poles | | | | | | |
| Heavy equipment | 2.89 | 29.66 | 14.62 | 0.04 | 1.34 | 1.27 |
| Worker vehicles | 0.08 | 0.10 | 1.10 | 0.00 | 0.13 | 0.04 |
| Total daily | 2.97 | 29.76 | 15.72 | 0.04 | 1.47 | 1.31 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Material Haul | | | | | | |
| Fugitive dust | — | — | — | — | 0.05 | 0.005 |
| Heavy equipment | 3.24 | 38.28 | 16.73 | 0.03 | 1.67 | 1.53 |
| Worker vehicles | 0.05 | 0.07 | 0.76 | 0.00 | 0.08 | 0.02 |
| Total daily | 3.29 | 38.35 | 17.49 | 0.03 | 1.80 | 1.56 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Structure Assembly and Installation | | | | | | |
| Heavy equipment | 3.27 | 36.88 | 17.57 | 0.05 | 1.37 | 1.26 |
| Construction trucks | 1.48 | 7.07 | 15.03 | 0.02 | 0.71 | 0.29 |
| Worker vehicles | 0.08 | 0.10 | 1.10 | 0.00 | 0.13 | 0.04 |
| Total daily | 4.83 | 44.05 | 33.70 | 0.07 | 2.21 | 1.59 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.3-6
Maximum Daily Construction Emissions – Transmission/Distribution Line Construction

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|---|-----------------------|-----------------|--------------|-----------------|------------------|-------------------|
| | <i>Pounds per Day</i> | | | | | |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Structure Erection</i> | | | | | | |
| Heavy equipment | 3.27 | 36.88 | 17.57 | 0.05 | 1.37 | 1.26 |
| Construction trucks | 1.48 | 7.07 | 15.03 | 0.02 | 0.71 | 0.29 |
| Worker vehicles | 0.08 | 0.10 | 1.10 | 0.00 | 0.13 | 0.04 |
| Total daily | 4.83 | 44.05 | 33.70 | 0.07 | 2.21 | 1.59 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Underground Distribution Line</i> | | | | | | |
| Fugitive dust | — | — | — | — | 0.01 | 0.001 |
| Heavy equipment | 0.85 | 8.83 | 7.27 | 0.01 | 0.53 | 0.49 |
| Construction trucks | 0.02 | 0.07 | 0.15 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.12 | 0.16 | 1.76 | 0.00 | 0.21 | 0.06 |
| Total daily | 0.99 | 9.06 | 9.18 | 0.01 | 0.76 | 0.55 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Underground Distribution Line – Interstate-5</i> | | | | | | |
| Fugitive dust | — | — | — | — | 0.01 | 0.001 |
| Heavy equipment | 1.48 | 17.99 | 8.35 | 0.03 | 0.62 | 0.57 |
| Construction trucks | 0.02 | 0.07 | 0.15 | 0.00 | 0.01 | 0.00 |
| Worker vehicles | 0.12 | 0.16 | 1.76 | 0.00 | 0.21 | 0.06 |
| Total daily | 1.62 | 18.22 | 10.26 | 0.03 | 0.85 | 0.63 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Wire Installation</i> | | | | | | |
| Heavy equipment | 9.68 | 110.05 | 56.16 | 0.11 | 4.99 | 4.59 |
| Construction trucks | 1.51 | 7.21 | 15.33 | 0.02 | 0.73 | 0.29 |
| Worker vehicles | 0.12 | 0.16 | 1.76 | 0.00 | 0.21 | 0.06 |
| Total daily | 11.31 | 117.42 | 73.25 | 0.13 | 5.93 | 4.94 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| <i>Right-of-Way Restoration and Cleanup</i> | | | | | | |
| Fugitive dust | — | — | — | — | 2.94 | 1.61 |
| Heavy equipment | 2.58 | 28.78 | 18.28 | 0.03 | 1.22 | 1.12 |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 2.64 | 28.86 | 19.16 | 0.03 | 4.26 | 2.76 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.3-6

Maximum Daily Construction Emissions – Transmission/Distribution Line Construction

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|-------------------|-----------------------|-----------------|----|-----------------|------------------|-------------------|
| | <i>Pounds per Day</i> | | | | | |
| Exceed threshold? | No | No | No | No | No | No |

Source: PacifiCorp 2016.

Notes: ROG = reactive organic gas (also known as volatile organic compound (VOC)); NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

Fugitive dust emissions from site preparation, grading, and underground distribution line construction have been based on the total size of the substation site (4.5 acres) for the substation; the total length of the transmission line (approximately 7,000 feet) times 50 feet, for a total of 8 acres; the total length of the distribution line (approximately 1,200 feet); and the size of the existing substation (0.5 acres).

Table 5.3-7

Maximum Daily Construction Emissions – Demolition of Mount Shasta Substation

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|------------------------|----------------|-----------------|-------|-----------------|------------------|-------------------|
| | Pounds per Day | | | | | |
| Equipment Removal | | | | | | |
| Fugitive dust | — | — | — | — | 0.38 | 0.06 |
| Heavy equipment | 2.14 | 24.92 | 12.23 | 0.03 | 1.05 | 0.96 |
| Hauling | 0.11 | 0.85 | 1.12 | 0.00 | 0.09 | 0.04 |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 2.31 | 25.85 | 14.23 | 0.03 | 1.62 | 1.09 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Foundation Removal | | | | | | |
| Fugitive dust | — | — | — | — | 0.79 | 0.12 |
| Heavy equipment | 2.97 | 32.20 | 17.70 | 0.04 | 1.49 | 1.37 |
| Hauling | 0.23 | 1.78 | 2.35 | 0.01 | 0.19 | 0.07 |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 3.26 | 34.06 | 20.93 | 0.05 | 2.57 | 1.59 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| Grading | | | | | | |
| Fugitive dust | — | — | — | — | 2.96 | 1.62 |
| Heavy equipment | 2.97 | 32.59 | 21.27 | 0.03 | 1.52 | 1.39 |
| Worker vehicles | 0.06 | 0.08 | 0.88 | 0.00 | 0.10 | 0.03 |
| Total daily | 3.03 | 32.67 | 22.15 | 0.03 | 4.58 | 3.04 |
| Significance threshold | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |

Source: PacifiCorp 2016.

Notes: ROG = reactive organic gas (also known as volatile organic compound (VOC)); NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Fugitive dust emissions from site preparation, grading, and underground distribution line construction have been based on the total size of the substation site (4.5 acres) for the substation; the total length of the transmission line (approximately 7,000 feet) times 50 feet, for a total of 8 acres; the total length of the distribution line (approximately 1,200 feet); and the size of the existing substation (0.5 acres).

Table 5.3-8
Maximum Daily Construction Emissions – Summary of Maximum Daily Emissions

| Emission Source | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|-------------------------------|-----------------------|-----------------|--------|-----------------|------------------|-------------------|
| | <i>Pounds per Day</i> | | | | | |
| 2016 | 19.68 | 216.88 | 117.67 | 0.19 | 19.39 | 14.08 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |
| 2017 | 18.30 | 199.21 | 114.58 | 0.24 | 18.51 | 13.27 |
| <i>Significance threshold</i> | 250 | 250 | 2,500 | 250 | 250 | 250 |
| Exceed threshold? | No | No | No | No | No | No |

Source: PacifiCorp 2016.

Notes: ROG = reactive organic gas (also known as volatile organic compound (VOC)); NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM₁₀ = coarse particulate matter; PM_{2.5} = fine particulate matter.

As shown in Table 5.3-8, emissions would be below thresholds established under SCAPCD Regulation VI – New Source Siting, Rule 6.1 – Construction Permit Standards for Criteria Air Pollutants. As such, construction of the proposed project would not result in a significant air quality impact. Additionally, operational emissions would be generated as a result of maintenance and repair crews that would travel to the site on a monthly or as-needed basis. Transmission line inspection would be performed on an annual or half-yearly basis or as needed. Operational activities would be similar to current activities for the existing substation; therefore, implementation of the proposed project would not result in a net increase in operational emissions on a daily or annual basis.

Implementation of the project would therefore not violate any adopted air quality standards or result in a considerable increase in any nonattainment pollutants. Impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- c) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Less Than Significant Impact. The geographic extent for the analysis of cumulative impacts related to air quality includes the limits of the Northeast Plateau Air Basin. The

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

primary air quality impacts of the proposed project would occur during construction, because the operational impacts would result from limited vehicle trips for operations, maintenance, and inspection, similar to current operational activities at the existing site.

The Northeast Plateau Air Basin is currently attainment or unclassified for all criteria air pollutants; therefore, the proposed project would not contribute to a cumulatively considerable air quality impact regarding a pollutant for which the air basin is currently nonattainment. However, the primary air pollutants of concern would be NO_x and VOCs, which are ozone precursors, and PM₁₀ and PM_{2.5}, because these pollutants can be generated in large quantities during construction from off-road construction equipment and on-road motor vehicles, including construction worker vehicles, vendor trucks delivering materials, and haul trucks. NO_x and VOCs are primarily emitted from motor vehicles and construction equipment, while PM₁₀ and PM_{2.5} are emitted primarily as fugitive dust during construction. Because of the nature of O₃ as a regional air pollutant, emissions from the entire geographic area for this cumulative impact analysis would tend to be important, although maximum O₃ impacts generally occur downwind of the area in which the O₃ precursors are released. PM₁₀ and PM_{2.5} impacts, on the other hand, would tend to occur locally; thus, projects occurring in the same general area and in the same period would tend to create cumulative air quality impacts.

As discussed previously, the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. However, the emissions of all criteria pollutants during construction would be below the significance levels and would not contribute to a cumulative impact.

Operation of the proposed project would include emissions generated primarily from vehicle trips associated with inspection and maintenance of the substation and would be similar to existing operational emissions and activities associated with the existing site. Operational emissions would therefore not violate any adopted air quality standards or result in a cumulatively considerable increase in any nonattainment pollutants.

Therefore, construction and operational activities would not result in a cumulatively considerable increase in any criteria air pollutant within the Northeast Plateau Air Basin and cumulative impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

d) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less Than Significant Impact. Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts on sensitive receptors are the most serious hazards of existing air quality conditions in the area. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Air quality regulators typically define sensitive receptors as schools (preschool–12th grade), hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. However, for the purposes of CEQA analysis the definition of a sensitive receptor also includes residents. The two primary emissions of concern regarding health effects for land development projects are diesel particulate matter (DPM) during construction and CO hotspots related to traffic congestion.

As stated previously, construction and operation of the proposed project would not result in any violation of applicable air quality standards, including impacts from substantial pollutant concentrations on sensitive receptors; therefore, impacts would be **less than significant**.

CO Hotspots

Based on the current level of traffic on nearby roadways and the short duration of construction activities associated with the proposed project, construction traffic would not create traffic congestion that could create substantial CO hotspots. Construction-related traffic would be temporary and short term in nature, and would occur intermittently throughout the various phases of construction. Additionally, project-generated trips would be in rural areas where the existing traffic is light and they would include components that would be spread throughout the day. For these reasons, construction-related traffic is not expected to impact local intersections and cause an exceedance of the CO CAAQS. Moreover, as discussed under Section 5.3.4(b), operation and maintenance vehicles would not exceed those under existing conditions for operation of the existing site, and would not significantly contribute peak-hour trips in the project area or impact roadway intersections. During operations, the proposed project would include periodic operation, maintenance, and inspection vehicle trips that would not result in a net increase in traffic on existing roadways. Therefore, the proposed project would not have the potential to create a CO hotspot or result in a considerable net increase of CO. Impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Air Toxics

Diesel exhaust particulate matter (DPM) would be emitted from heavy equipment and trucks used in the construction process. Because DPM is considered to be carcinogenic, long-term exposure to diesel exhaust emissions could result in adverse health impacts. Implementation of the proposed project would result in short-term, temporary emissions of diesel exhaust from construction equipment that would be phased intermittently over approximately 41 weeks. Generation of construction-related emissions would occur during daytime working hours with varying uses over that time of equipment and vehicles dependent on diesel fuel. Because of the short-term nature and low frequency of construction emissions, diesel exhaust emissions would not expose sensitive receptors to substantial pollutant concentrations. Moreover, upon completion of construction activities, all construction-related DPM emissions would cease. Therefore, impacts to sensitive receptors due to emissions of air toxics would be **less than significant**.

With respect to operations, no impacts associated with DPM would result. Operation and maintenance activities would be limited due to infrequent activities associated with maintenance activities, inspections, and occasional repairs, and would resemble existing operational activities. Therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

e) *Would the project create objectionable odors affecting a substantial number of people?*

Less Than Significant Impact. Odors are the form of air pollution that is most obvious to the public. Odors can present significant problems for both the source and surrounding community. Although offensive odors seldom cause physical harm, they can be annoying and cause concern.

The State of California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700 and SCAPCD Rule 4.2 – Nuisance, commonly referred to as the public nuisance law, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. A project that proposes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. Odor issues are very subjective by the nature of odors themselves and due to the fact that their measurements are difficult to quantify. As a result, this guideline is qualitative, and will focus on the existing and potential surrounding uses and location of sensitive receptors.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Construction of proposed project would result in the emission of diesel fumes and other odors typically associated with construction activities. These compounds would be emitted in varying amounts on the site depending on where construction activities are occurring, number and types of construction activities occurring, and prevailing weather conditions, among other factors. Sensitive receptors located in the vicinity of the construction site may be affected. Total construction would take up to approximately 41 weeks and would be distributed over an expansive linear area, as shown in Figure 4-2, Project Component Overview. The emissions would be isolated to the immediate vicinity of the construction site and would be limited to a finite period that would be relatively short as construction activities move along the alignment.

Regarding project operations, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass-molding facilities. The proposed project would not generate objectionable odors off site, nor would significant odors be generated during operation and maintenance of the facility, because it is not associated with the aforementioned land uses and would not propose operational activities that would be commonly associated with substantial odor-generating activities such as fertilizer application for agricultural uses or the treatment of wastewater. Maintenance of the proposed project would involve limited activities such as periodic facility inspections, which would be intermittent and temporary; therefore, maintenance activities would not create objectionable odors. Additionally, no substantial increase in odors would occur as a result of implementation of the proposed project because operational activities would resemble those currently being conducted for the existing facilities. As such, impacts related to creation of odors during construction, operation, and maintenance of the proposed project would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

5.3.5 References Cited

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.4 BIOLOGICAL RESOURCES

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| BIOLOGICAL RESOURCES – Would the project: | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.4.1 Environmental Setting

Methodology

Preliminary investigations included a review of information obtained from literature searches, examinations of habitat as discernible from aerial photographs, and database searches, including the California Native Plant Society and the California Natural Diversity Database (CNDDB) records. In addition, to better identify and characterize the existing biological resources present in and adjacent to the project area (defined as the area including the proposed construction

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

workspace area for each pole, the right-of-way (ROW), staging areas, and new and existing access routes), a GIS analysis was performed that consisted of mapping baseline biological resource data including vegetation, CNDDB records, and water resources.

An initial reconnaissance-level biological resource survey was conducted on September 14, 15, and 16, 2014, and again on July 15 and 16, 2015 (to account for updates in the project ROW). Wetland delineation surveys were conducted in September 2011 and again in July 2015. The biological study area (BSA) in which surveys were conducted included the immediate project area (footprint of disturbance, as described above) and all areas within 250 feet of the existing and proposed substation, existing and proposed transmission/distribution lines, and within 50 feet of existing and temporary access roads that would encompass sufficient area to assess the potential for indirect effects from site preparation activities and construction.

The reconnaissance-level surveys included more detailed vegetation mapping of the entire BSA and an assessment of the potential for various special-status plant and wildlife species to occur within areas proposed for disturbance. General botanical and wildlife observations were noted in and adjacent to the BSA during these surveys. Vegetation communities were classified according to Holland (1986). The botanical observations of the sites were floristic in nature, meaning that plants incidentally observed were identified to the taxonomic level needed to determine whether they were special-status plant species. Wildlife species were detected and identified either by observation, by vocalization, or by sign (e.g., tracks, burrows, scat). Details of the surveys are included in the Biological Resources Technical Report provided in Appendix B of the Proponent's Environmental Assessment (PEA; PacifiCorp 2015). All data collected were used along with data provided by the literature review to characterize habitat suitable to support special-status species known to occur in the vicinity and to make further determinations on the potential for those special-status species to occur in the BSA.

Vegetation Communities

Five vegetation communities were identified and characterized, pursuant to Holland (1986), in the BSA. These included lower montane coniferous forest, montane meadow, transmontane freshwater marsh, riparian scrub, and non-native grassland. Portions (121.0 acres) of the project area and BSA were also noted as being in a disturbed/developed condition. The acreage of each vegetation community is listed in Table 5.4-1. Figures depicting the location and extent of these communities in the BSA are included in the Biological Resources Technical Report (PacifiCorp 2015, Appendix B). The BSA, as compared to the project area, is larger and contains a larger amount of habitat.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.4-1
Vegetation Communities (Acreages)

| Vegetation Community Type | Project Area (Acres) | Biological Study Area (Acres) |
|---------------------------------|-------------------------|----------------------------------|
| Lower montane coniferous forest | 21.9 | 3,391.6 |
| Montane meadows | 50.9 | 8.2 |
| Transmontane freshwater marsh | 11.9 | 3.4 |
| Riparian scrub | 25.8 | 7.0 |
| Non-native grassland | 8.8 | 4.6 |
| Total | 119.3 | 3,414.8 |

A brief description of each of these communities follows.

Lower Montane Coniferous Forest

Lower montane coniferous forest is an open-to-dense forest dominated by conifers and is found at lower and middle elevations in the mountains and foothills of northern California. This community is dominated by ponderosa pine (*Pinus ponderosa*), with incense cedar (*Calocedrus decurrens*), black oak (*Quercus kelloggii*), and Douglas-fir (*Pseudotsuga menziesii*). The shrub layer contains scattered dogwood (*Cornus* spp.), gooseberry (*Ribes* spp.), and wild cherry (*Prunus* spp.). The understory varies, but is often dominated by creeping snowberry (*Symphoricarpos mollis*) with native perennial grasses and forbs. Fragmented lower montane coniferous forest borders the northwest and southeast ends of the BSA.

Montane Meadow

Two types of montane meadow, wet montane meadow and dry montane meadow, are described; both types can occur in a single meadow and are differentiated in the field by soil moisture and vegetation.

Wet montane meadow is a wetland typically associated with swamps, fens, or bogs in waterlogged soils, or may be adjacent to forest or scrub in better-drained soils. Wet montane meadow is characterized by dense growth of sedges (*Carex* spp.) or other perennial herbs such as rushes (*Juncus* spp.) and bulrushes (*Scirpus* spp.).

Wet montane meadow occurs in the BSA north of Hatchery Lane. A small creek flows from the northeast corner of the parcel to the southwest, filling the wetland that makes up the majority of the parcel. Soils were saturated with standing water and vegetation was dominated by obligate wetland species, including sedges, rushes, and cattails (*Typha* spp.). Cattails occurred in areas

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

with standing water that braided in and out of the ROW. Shrubs and trees, including willows (*Salix* spp.), white alder (*Alnus rhombifolia*), wild cherry, rose (*Rosa* sp.), and cedar occurred along the raised fence line and the stream channel in the northern portion of the wetland. Wet montane meadow along the ROW north of Hatchery Lane was disturbed by heavy grazing on the west side of the fence line and light grazing on the east side of the fence line.

Dry montane meadow can be described as seasonal wetlands and typically occurs adjacent to wet montane meadow communities, often associated with fens, bogs, and swamps. Dry montane meadow may not have capillary water available year-round and may dry out seasonally. Dry montane meadow generally occurs on fine-textured soils and is often adjacent to forest or scrub on better-drained soils.

Dry montane meadow occurs in the BSA east of Old Stage Road. Soils varied from dry to moist. Vegetation was dominated by facultative and obligate wetland species. Dry montane meadow along the ROW north of Hatchery Lane was heavily grazed. Dry montane meadow adjacent to and along the proposed project is seasonal in nature, but not considered “vernal” as described in current literature on vernal pool distribution (Holland 1998; Zedler 2003). No vernal pools occur in the BSA.

Transmontane Freshwater Marsh

Transmontane freshwater marsh is dominated by perennial emergent monocots, including cattails and rushes, which may form completely closed canopies (Holland 1986). Sites are semi-permanently flooded by freshwater, lack a significant current, and are often located adjacent to rivers or streams. Prolonged saturation accumulates deep, peaty soils.

Transmontane freshwater marsh was located in the northern portion of the BSA on both sides of Hatchery Lane. At the time of the surveys, soils were saturated with standing water and vegetation was dominated by stands of cattails and bulrushes. The existing transmontane freshwater marsh is associated with the montane meadow community described above. The boundary between transmontane freshwater marsh and wet montane meadow was distinguished by vegetation dominance. Both the transmontane freshwater marsh and montane meadow communities form the Morgan–Merrill Wetland Mitigation Site (Theiss and Associates 1990; Enplan 2008) south of Hatchery Lane Road and north of the Mount Shasta Substation. The transmontane freshwater marsh in the project area north of Hatchery Lane Road is currently grazed by cattle and horses.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Riparian Scrub

Riparian scrub is a dense, winter-deciduous thicket occurring along streams dominated by one or more species of willow and by other fast-growing shrubs and vines, including alders (*Alnus* spp.) and/or dogwoods. Within the BSA, riparian scrub is dominated by willows, dogwoods, and black hawthorn (*Crataegus douglasii*), with a dense cover of Himalayan blackberry (*Rubus armeniacus*) brambles along riparian edges in disturbed locations.

Non-Native Grassland

Non-native annual grassland is dominated by a variety of non-native grasses and forbs (Holland 1986). Non-native grassland in the BSA was heavily grazed and occurs on the west side of Old Stage Road and within the large fenced residential yards of the proposed Lassen Substation site. Dominant species included creeping bentgrass (*Agrostis stolonifera*), orchardgrass (*Dactylis glomerata*), annual bluegrass (*Poa annua*), and common velvetgrass (*Holcus lanatus*). Additionally, a creek was mapped within non-native grassland near the southern portion of the project ROW.

Creeks

Although not specifically described as a vegetation community, agricultural ditches and a portion of Cold Creek occur within the BSA and the project area and were mapped as creeks on the vegetation map (PacifiCorp 2015, Appendix B). These features ranged from 2 to 3 feet in width and 1 to 2 feet in depth. Due to their small surface area, the acreage for these features was included within the acreages of the dominant vegetation community in which they occur. Cold Creek, which occurs as an ecotone between freshwater marsh and montane meadow on the eastern side of the project area south of Pole 6-48, is thickly vegetated with sedges, bulrushes, and rushes. Cold Creek has a muddy bottom and very little observable open water, which is slow moving. Of the agricultural ditches in the project area, only one was prominent enough to map as a creek, crossing the project area just south of Pole 21-48. This feature is open water, with no emergent vegetation, and ranges from 2 to 3 feet in width and 1 to 2 feet in depth. This ditch occurs within non-native grassland, and its edges are dominated by non-native grasses. Other agricultural ditches that were narrower in width and shallower in depth were not noted on the vegetation map.

Disturbed/Developed

Although not a vegetation community, disturbed/developed areas occur throughout the BSA and include areas devoid of vegetation (cleared, graded, or containing buildings and offices), including dirt roads and paved roads. Other disturbed/developed areas support a sparse cover of ruderal or ornamental vegetation and do not contain enough native or natural plant material to be considered a vegetation community.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Special-Status Species

For the purposes of this analysis, special-status species are defined as follows:

- Species listed or proposed for listing as threatened or endangered under ESA (50 CFR 17.12 for listed plants; 50 CFR 17.11 for listed animals; and various notices in the Federal Register for proposed species).
- Species that are candidates for possible future listing as threatened or endangered under ESA (74 FR 57804).
- Species that are listed or proposed for listing by the state of California as threatened or endangered under the California Endangered Species Act (CESA; 14 CCR 670.5).
- Species identified by the California Department of Fish and Wildlife (CDFW) as fully protected species, including fish and wildlife that do not have state or federal threatened or endangered status but may still be threatened with extinction (CDFW 2015).
- Species considered by the CDFW to be Species of Special Concern because of declining population levels, limited range, and/or continuing threats that have made them vulnerable to extinction (CDFW 2015).
- Plants listed as rare under the California Native Plant Protection Act (California Fish and Game Code, Section 1900 et seq.).
- Plants considered by the California Native Plant Society to be “rare, threatened, or endangered in California and elsewhere” (California Rare Plant Rank 1B and 2) (CNPS 2016).
- Species that are not state or federally listed but under the California Environmental Quality Act (CEQA) Guidelines, Section 15380, meet the definition of rare (species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range) or endangered (species’ survival and reproduction in the wild are in immediate jeopardy).

Plants

A total of 66 special-status plant species were identified from the literature and database review as occurring or potentially occurring in the project region. Of these 66 plant species, only 24 species were considered to have some potential of occurring in the BSA: 2 species were determined to have a high potential for occurrence, 7 had moderate potential, and 15 had a low potential for occurrence. Potential for occurrence was based on habitat suitability, elevation, soil, and proximity to known recorded occurrences of a particular species in the region. The remaining 42 species are not expected to occur in the BSA and the immediate project area due to

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

a lack of habitat and other criteria. None of the 24 special-status plants with potential to occur were detected during the field surveys; however, although a general plant inventory was conducted during the reconnaissance surveys, species-specific plant surveys for special-status species were not conducted because the reconnaissance surveys were performed outside the suitable blooming periods for some species.

A detailed description of each of the 24 special-status plant species determined to have some potential of occurring in the BSA is provided in the Biological Resources Technical Report (PacifiCorp 2015, Appendix B). A list of all plant species observed during the surveys is provided in Appendix A of the Biological Resources Technical Report.

Wildlife

A total of 30 special-status wildlife species were identified from the literature and database review as occurring or potentially occurring in the project region. Of these 30 wildlife species, 19 species were considered to have some potential of occurring within the BSA and immediate project area: 4 were determined to have a high potential for occurrence, 10 had moderate potential, and 5 had low potential. Potential for occurrence was based on habitat suitability for a particular species and proximity to known recorded occurrences of a species in the region. The remaining 11 species are not expected to occur in the BSA and the immediate project area due to a lack of habitat and other criteria. None of the 19 special-status wildlife species with potential to occur were detected during the field surveys; however, species-specific surveys were not conducted as part of the habitat assessment.

A detailed description of 26 of the special-status wildlife species determined to have some potential of occurring in the BSA is provided in the Biological Resources Technical Report (PacifiCorp 2015, Appendix B). A list of all wildlife species observed during the surveys is provided in Appendix B of the Biological Resources Technical Report.

Jurisdictional Wetlands

Methods

As previously noted, a jurisdictional wetland delineation in the BSA was conducted in September 2011 and in July of 2015. Prior to conducting the on-site field investigations, an inventory of readily available data, including aerial photography, U.S. Geological Survey topographic maps, National Wetland Inventory maps, data from the National Hydrography Dataset, and U.S. Department of Agriculture, Natural Resources Conservation Service soil surveys of the project area were examined to determine areas of potential U.S. Army Corps of Engineers (ACOE) jurisdiction. A more detailed discussion of the definitions of types of

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

wetlands and waters under ACOE jurisdiction and the overall regulatory framework associated with such jurisdiction can be found in the Jurisdictional Delineation Report provided in Appendix D of the PEA (PacifiCorp 2015).

Potential jurisdictional areas were evaluated and delineated in accordance with the methodology set forth in the ACOE's 1987 Corps of Engineers Wetland Delineation Manual (Manual; ACOE 1987), and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0) (WMVC; ACOE 2010). Each potential wetland area was investigated for wetland indicators (soils, vegetation, and hydrology). Wetland features were surveyed using Trimble GPS units with sub-meter accuracy and jurisdictional boundaries were initially mapped in the field using project field maps. These boundaries were then confirmed and refined using aerial imagery, including historical imagery (Google 2015), to capture the extent of each wetland intersecting the ROW. Only those potentially jurisdictional features that intersected the project ROW and proposed temporary access routes were delineated. Wetlands and other waters that are located outside the ROW and not within anticipated areas of project-related ground disturbance and that would not be affected by the project were not delineated.

Results

The field investigation resulted in the delineation of four jurisdictional wetlands in the project area, most of which are located north of the existing Mount Shasta Substation and all of which intersect the project ROW. All four wetlands were characterized as palustrine emergent (PEM) wetlands, in which the dominant vegetation species are erect, rooted, herbaceous hydrophytes with at least 30% aerial coverage. Vegetation in these wetlands (occurring within both the transmontane freshwater marsh and wet montane meadow vegetation communities described previously) is dominated by perennial plants and vegetation for most of the growing season in most years. Due to the relatively stable climate of the project area, these wetlands often maintain the same appearance year after year (Dahl et al. 2015), although in some years these wetlands may be heavily grazed. The portion of the wetlands delineated as occurring within the project ROW are relatively small; two of the wetlands are approximately 2 acres in size and the other two are less than 1 acre.

Detailed discussions of soil types and soil locations, and the hydrologic data, hydrogeomorphic characteristics, and locations of each of the four wetland areas can be found in the Jurisdictional Delineation Report (PacifiCorp 2015, Appendix D).

As described previously, Cold Creek is a perennial stream that derives flow from both local springs and surface runoff from precipitation or snowmelt (Theiss and Associates 1990).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Riparian vegetation on both banks of Cold Creek is dominated by black hawthorn, Himalayan blackberry, willow thickets, and dogwoods. The ordinary high water mark of Cold Creek was not delineated during the investigations because the proposed access roads would not cross the stream or affect associated riparian habitat.

5.4.2 Regulatory Setting

Federal

Endangered Species Act

The federal Endangered Species Act (ESA) protects fish and wildlife species that have been listed by the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service as threatened or endangered. In general, the National Marine Fisheries Service is responsible for protection of federally listed marine species and anadromous fishes, while other listed species are under USFWS jurisdiction. Provisions of ESA Section 9, which prohibits take of threatened or endangered species, and Sections 7 and 10, which require permits for take of listed species, may be relevant to the proposed project. “Take” is defined under ESA as to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct,” including loss of habitat of listed species that would result in “harm”.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (16 U.S.C. 703 et seq.) prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the act, “take” is defined as the action of or attempt to “pursue, hunt, shoot, capture, collect, or kill.” This act applies to all persons and agencies in the United States, including federal agencies.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (16 U.S.C. 668) specifically protects bald and golden eagles from harm or trade of nests, eggs, and body parts of these species. The Bald and Golden Eagle Protection Act is administered by the USFWS.

Clean Water Act

Waters of the United States including wetlands are subject to ACOE jurisdiction under Section 404 of the Clean Water Act. A Section 404 permit is required for the discharge of dredged or fill material into waters of the United States. The Sacramento district of the ACOE would provide review and permitting services for this project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

State

California Environmental Quality Act

CEQA requires California public agencies to identify and mitigate the significant environmental impacts of projects that they are considering for approval. A project normally has a significant environmental impact on biological resources if it substantially affects a rare or endangered species or the habitat of that species, substantially interferes with the movement of resident or migratory fish or wildlife, or substantially diminishes habitat for fish, wildlife, or plants. The CEQA Guidelines define rare, threatened, and endangered species as those listed under ESA or CESA or any other species that meet the criteria of the resource agencies or local agencies (e.g., Species of Special Concern, as designated by CDFW). The effects of a proposed project on these resources are important in determining whether the project has significant environmental impacts under CEQA. CEQA ultimately authorizes the lead agency to require mitigation measures that avoid, minimize, or mitigate potentially significant impacts.

California Endangered Species Act

The state implemented CESA in 1984. The act prohibits the take of state-listed endangered and threatened species; however, habitat destruction is not included in the state's definition of "take." Under CESA, "take" is defined as an activity that would directly or indirectly kill an individual of a species. Section 2090 requires state agencies to comply with endangered species protection and recovery and to promote conservation of these species. CDFW administers the act and may authorize take through Section 2081 agreements (except for species designated as fully protected). Regarding rare plant species, CESA defers to the California Native Plant Protection Act of 1977, which prohibits importing, taking, and selling rare and endangered plants. State-listed plants are protected in cases where state agencies are involved in projects under CEQA. In these cases, plants listed as rare under the California Native Plant Protection Act are not protected under CESA but can be addressed under CEQA.

Porter-Cologne Water Quality Control Act

The California Water Code addresses the full range of water issues in the state, and includes Division 7, known as the Porter-Cologne Water Quality Control Act (Sections 13000–16104 of the California Water Code). Section 13260 requires "any person discharging waste, or proposing to discharge waste, in any region that could affect the waters of the State to file a report of discharge (an application for waste discharge requirements (WDRs))" with the appropriate Regional Water Quality Control Board.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California Fish and Game Code

Fully Protected Species

The California Fish and Game Code provides protection from take for a variety of species, referred to as fully protected species. Section 5050 lists fully protected amphibians and reptiles. Section 3515 lists fully protected fish species. Fully protected birds are listed in Section 3511, and fully protected mammals are listed in Section 4700. The California Fish and Game Code defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” Except for take related to scientific research or as included under an approved Natural Community Conservation Plan, all take of fully protected species is prohibited under state law and no permits are available for such take.

Sections 3503 and 3503.5

Section 3503 of the California Fish and Game Code prohibits the destruction of active bird nests or eggs. Section 3503.5 prohibits the killing of raptor species and the destruction of active raptor nests or eggs.

Sections 1600–1616

CDFW regulates activities that would interfere with the natural flow of or substantially alter the channel, bed, or bank of a lake, river, or stream including disturbance of riparian vegetation under California Fish and Game Code Sections 1600–1616. CDFW requires a Lake and Streambed Alteration Agreement (Streambed Alteration Agreement) permit for these activities.

Local

Siskiyou County General Plan

The Conservation Element of the Siskiyou County General Plan (amended 2000) includes general objectives relating to biological resources. These objectives include the following:

1. Preserve, protect and manage the Forest Lands as both wild habitat and a productive economic resource.
2. Preserve, maintain streams, lakes, and forest open space as a means of providing natural habitat for species of wildlife (Siskiyou County Planning Department 1973).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

City of Mount Shasta General Plan

The Open Space/Conservation Element of the City of Mount Shasta General Plan include the following Objectives and Programs for the Conservation of Natural Resources:

1. Conserve lands that support important fisheries, wildlife and botanical habitat, and wetlands.
2. Protect riparian habitat along streams in the Planning Area.
3. Conserve wetland areas (City of Mount Shasta 2007).

City Tree Ordinance

The City maintains a City Tree Ordinance with the stated purpose being the control, management, conservation, and planting of City trees to enhance the appearance of the City, and protection of related economic and environmental resources. The Tree Ordinance is only applicable to trees in the public ROW and in commercial and industrial zones.

5.4.3 Applicant Proposed Measures

Applicant proposed measures (APMs) are intended to minimize the potential for impacts resulting from construction, operation, and maintenance of the proposed project before such impacts can occur. APMs differ from mitigation measures, which are typically proposed for the purpose of mitigating specific impacts after they occur.

Specific APMs intended to avoid or minimize the potential for project-related impacts to biological resources are provided in this section.

APM-BIO-1 Focused pre-construction surveys for special-status plant species shall be conducted in appropriate habitat and at the time of year when species are both evident and identifiable (typically when the species is flowering or fruiting), according to U.S. Fish and Wildlife Service (~~USFWS~~) and California Department of Fish and Wildlife (CDFW) protocols for species having a specified protocol, or according to standard, scientifically accepted systematic surveys appropriate for each species. Surveys ~~will~~ shall be conducted in areas of planned ground disturbance prior to such disturbance occurring. If special-status plant species are located during focused surveys within the project footprint area, avoidance of these plants shall be the first priority and can include such measures as modifications in the placement of transmission poles, access and spur roads, and of various marshalling and staging areas in accordance with the final project design and needs.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

If avoidance is not possible, relocation efforts, including topsoil salvage and relocation, if necessary, will be implemented. If PacifiCorp proposes any changes to the current construction plan or pole replacement sites after focused surveys for special-status species are conducted, additional field surveys shall be required prior to construction activities.

Pre-construction biological clearance surveys shall be conducted to avoid or minimize potential impacts to special-status wildlife species. This includes surveys for bat species, which shall be conducted by a qualified bat biologist and shall include focused searches for daytime and maternal roost sites appropriate for the bat species most likely to be roosting within the project right-of-way. If active bat roosts are discovered during pre-construction surveys, the qualified bat biologist shall coordinate with CDFW on appropriate avoidance/minimization measures, including the type and timing of such measures, to be implemented. If active special-status mammal burrows are located during surveys, avoidance measures shall be incorporated and the Environmental Monitor shall proceed as described in APM-BIO-6. Any special-status plant or wildlife species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.

APM-BIO-2 Prior to first use, the undercarriages, wheels, and bodies of construction and operations equipment previously used outside of the project area shall be thoroughly washed in maintenance yards by high-pressure jets to eliminate any soil buildup that may contain invertebrates, such as insects and insect eggs, or the seeds of exotic plant species.

APM-BIO-3 Every reasonable effort shall be made to minimize temporary and permanent removal of native vegetation at work areas. If required, native vegetation shall be flagged for avoidance. If native vegetation cannot be avoided, it will be crushed or cut rather than bladed or rooted out. A project revegetation plan shall be prepared for areas of native vegetation temporarily affected by project construction activities. The revegetation plan shall be prepared by a qualified botanist or revegetation specialist and submitted to the California Department of Fish and Wildlife for review prior to any construction or ground disturbance of the area that will be temporarily impacted. The plan shall include, at a minimum, a discussion of the following: qualifications and experience of individuals performing the revegetation; methods (including soil preparation, seeding, planting, irrigating) to be used to revegetate the impacted area; monitoring methods and data to be collected on the revegetated area; success criteria; steps to be taken if the revegetation is not successful; and adaptive management to be implemented.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- APM-BIO-4** Construction crews shall avoid affecting the streambeds and banks of any streams along the route, to the extent feasible. If necessary, a Lake and Streambed Alteration Agreement (LSAA) will be ~~secured from the CDFW~~ prepared and submitted to the California Department of Fish and Wildlife for review and approval prior to construction in the affected area. Impacts ~~will~~ shall be mitigated based on the terms of the LSAA. No streams with flowing waters or those capable of supporting special-status species would be expected to have permanent adverse impacts from project implementation.
- APM-BIO-5** To avoid impacts from temporary access to wetland areas, existing access roads and temporary access methods (e.g., high density polyethylene (HDPE) driving mats, portable road platforms) shall be used to access pole replacement sites. Results of the wetland delineation (Appendix D of the Proponent's Environmental Assessment) shall be incorporated into vehicle access routes, which shall be designed to avoid and minimize wetland disturbance. Access to pole extraction and placement locations that will occur within wetland areas, particularly those north of the existing substation that are more prone to water inundation during wet years, will be conducted when conditions are dry and ground saturation would not pose an issue for vehicle access.
- APM-BIO-6** Environmental Monitors shall be assigned to the project, and will be responsible for ensuring that impacts to special-status species, native vegetation, wetlands, wildlife habitat, and unique resources are avoided to the fullest extent possible. The monitor shall delineate and mark for avoidance in the field all known sensitive resource locations and, where appropriate, use flagging to delineate boundaries of areas from where activities are restricted to protect wetlands, native plants and wildlife, or special-status species. If the monitor determines that project activities may adversely affect the species, the monitor shall have authority to halt construction activities until the monitor can consult with the U.S. Fish and Wildlife Service ~~USFWS~~ and/or California Department of Fish and Wildlife ~~CDFW~~ regarding appropriate avoidance measures. These restricted areas shall be monitored during construction to ensure their protection.
- APM-BIO-7** PacifiCorp shall conduct all pole installation, conductor installation, tree trimming, tree removal, grading, and clearing of vegetation from September 1 to February 28, outside of the nesting season. The March 1–August 31 nesting season dates are guidelines: nesting season may begin earlier or end later depending on weather conditions; nests will be protected regardless of the calendar date. If construction cannot be completed outside of the nesting season,

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

pre-construction surveys within the project area will be conducted by a qualified biologist for nests prior to ground disturbance, tree trimming, or other construction activities. The nesting bird clearance survey will be conducted within 3 days prior to construction activities. For passerines, a 50-foot buffer will be installed around the nest and maintained around the nest until the young have fledged. A larger buffer may be required if nesting birds appear stressed. Nesting raptors require a larger buffer area than passerines. If a raptor nest is observed, a 300-foot buffer will be installed. If a nesting raptor is observed within 300 feet of the project area prior to the start of construction, a qualified biologist will determine whether or not construction activities could potentially disturb nesting raptors and implement appropriate measures (e.g., on-site monitor, timing restriction) to adequately protect nesting raptors. Any special-status bird species observed during pre-construction surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.

APM-BIO-8 A Worker Environmental Awareness Program (WEAP) shall be prepared and all construction crews and contractors shall be required to participate in WEAP training prior to starting work on the project. The WEAP training shall include a review of the special-status species and other sensitive resources that could occur in the project area, the locations of any existing sensitive resources, their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. A record of all personnel trained shall be maintained.

APM-BIO-9 Migratory bird flight paths in the project area are currently unknown. An impact assessment study and bird observation surveys shall be conducted according to the Avian Power Line Interaction Committee's (APLIC 1994) survey protocol. The surveys shall be conducted in wetlands along both sides of the existing transmission line within the study area. The surveys shall be done in consultation with the California Department of Fish and Wildlife. ~~CDFW~~. Results of the bird observation surveys will determine potentially impacted species and locations to mark wires to increase their visibility to flying birds. Line markers should be designed to be raptor-safe in accordance with the Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 2012 (APLIC 2012), evaluated and approved by PacifiCorp engineers prior to implementation.

APM-BIO-10 Vehicles shall be restricted to previously established roadways and access routes.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

APM-BIO-11 Trash, dumping, firearms, open fires, hunting, and pets shall be prohibited in the project area.

APM-BIO-12 If construction within and near potential willow flycatcher (*Empidonax traillii*) habitat (riparian scrub and surrounding wet meadow) cannot be completed outside of the willow flycatcher nesting season (June 1 ~~through to~~ August 31), broadcast surveys shall be conducted to determine presence/absence of the species prior to construction activities. If absence is determined, construction may begin within the potential willow flycatcher habitat. If presence is determined, flycatcher ~~detections-nests will~~ shall be buffered by ~~150-500~~ feet, or as otherwise determined in consultation with the California Department of Fish and Wildlife, and construction activities ~~will~~ shall not occur within the buffer area for the remainder of the nesting season. Any willow flycatcher observed during surveys shall be recorded, and such observations shall be reported to the California Natural Diversity Database.

APM-BIO-13 Operation and maintenance activities that must occur in or near potential willow flycatcher habitat (riparian scrub and surrounding wet meadow) ~~will~~ shall be conducted outside of the willow flycatcher nesting season (June 1 ~~through to~~ August 31), whenever practicable. If project construction occurs within habitat occupied by nesting willow flycatcher, because the species is state listed as endangered, a state Incidental Take Permit would be required.

5.4.4 Environmental Impacts and Mitigation

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Special-Status Plants

Less Than Significant Impact with Mitigation Incorporated. As previously noted, 24 special-status plant species were determined to have some potential to occur within the BSA and immediate project area based on habitat suitability, elevation, soils, and proximity to known recorded occurrences of the species. None of these 24 plant species is state- or federally listed as threatened or endangered.

With implementation of APM-BIO-1 (pre-construction surveys), special-status plants located during pre-construction surveys or during construction will be avoided to the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

fullest extent feasible. Potential for habitat modification through removal of native vegetation that is determined to support special-status plant species would be avoided or minimized through implementation of APM-BIO-2 (vehicle undercarriage washing), APM-BIO-3 (minimize impacts to native vegetation), and APM-BIO-10 (established roadways and access routes). Implementation of APM-BIO-6 (Environmental Monitors during construction activities) would ensure that areas where special-status plants are located would be avoided during construction activities.

Pursuant to APM-BIO-1, if avoidance of special-status plants is considered infeasible, and topsoil salvage or plant relocation is determined to be the appropriate course of action to avoid impacts to special-status plants, Mitigation Measure (MM) BIO-1 shall be implemented, as follows:

MM-BIO-1 A topsoil salvage and relocation plan shall be prepared that includes the following information: (1) a description of the methods to be utilized with any topsoil salvage or plant relocation, (2) a description of the receiving location for salvaged topsoil or relocated plants, (3) a discussion of the criteria and measures to be used to determine success of relocated plants, (4) monitoring to be implemented to measure the success of plant relocation, and (5) adaptive management to be used in association with any plant relocation. Any topsoil salvage and/or plant relocation plans shall be reviewed and approved by the California Department of Fish and Wildlife.

Special-Status Wildlife

Reptiles and Amphibians

Less Than Significant. One special-status amphibian species, Cascades frog (*Rana cascadae*; state Species of Special Concern), has a moderate potential to occur within the BSA. Construction disturbances associated with the project could potentially crush individual frogs on the ground surface, within burrows, or sequestered beneath surface debris and rocks. With implementation of APM-BIO-1 (preconstruction surveys), APM-BIO-3 (minimize vegetation impacts), APM-BIO-4 (minimize riparian disturbance), APM-BIO-5 (temporary access to wetlands), APM-BIO-6 (Environmental Monitor during construction activities and consultation with CDFW regarding avoidance measures if a special-status species is located within proposed disturbance areas), APM-BIO-8 (WEAP), and APM-BIO-10 (restriction to established roadways and access routes), significant adverse impacts to this special-status amphibian are expected to be avoided.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Raptors

No Impact. Four species of raptors have a low potential to occur within the BSA: bald eagle (*Haliaeetus leucocephalus*), osprey (*Pandion haliaetus*), northern goshawk (*Accipiter gentilis*), and Swainson's hawk (*Buteo swainsoni*). All four of these raptors are only expected to use the BSA and project area for occasional foraging and/or roosting, or to fly over the site during transit to other preferred foraging areas or during movement periods. Both the bald eagle and osprey tend to nest and forage near large bodies of water; Lake Siskiyou, Shasta Lake, and other lakes in the regions have historically served as foraging and nesting areas for these two large raptors (CNDDDB 2015). Although the taller trees in the BSA and along the perimeter of the proposed project site could potentially serve as nest sites, no records exist of nesting by either species in the immediate vicinity of the project area. Furthermore, the fragmented nature of the woodlands in the BSA, the large amount of human activity in and adjacent to the BSA, and the relatively large distance of the project from large bodies of water are expected to serve as inhibitors to either of these species nesting in or adjacent to the BSA. In addition, the small creeks and drainages crossing the project area do not contain fish (the preferred prey of these raptors) and are too small to be used by either species as foraging habitat. Therefore, neither bald eagles nor ospreys are expected to nest in or immediately adjacent to the BSA, and they would likely use the site only as infrequent flyover habitat.

Although the CNDDDB contains one historic record of nesting northern goshawk within a 5-mile radius of the project area, and more recent records occur farther away, the species prefers dense, mature coniferous forests at middle and higher elevations and is not expected to nest within the fragmented lower-elevation coniferous forest that occurs along portions of the project alignment. The species would potentially use surrounding woodlands as infrequent foraging habitat during movements between preferred habitat areas; however, the fragmented nature of the BSA and its proximity to ongoing human activities (residences, traffic on local roads, recreationists) likely limit the attractiveness of the BSA and project area as foraging or roosting habitat for northern goshawk. No CNDDDB records exist for nesting Swainson's hawks within 5 miles of the project area. The open grassland areas in and adjacent to the BSA could serve as foraging habitat on an infrequent basis during regional movement episodes or migration. However, due to the lack of historic nesting of Swainson's hawk in the immediate region, the species is not expected to nest in or adjacent to the BSA.

Removal of vegetation in the project area may reduce the numbers of some prey for the northern goshawk or Swainson's hawk during infrequent foraging in the area, at least temporarily. However, because of the very small footprint associated with the proposed

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

project, the loss of a minimal amount of grassland and woodland habitat would not be considered substantial with respect to foraging by either of these species. Moreover, after construction, the remaining grassland and woodland habitats are expected to continue to function as foraging habitat for these two raptor species as well as other more common raptor species in the area.

The spacing between conductors and grounding surfaces on the new 69 kilovolt (kV) structures for this project would be adequate to preclude electrocution potential for raptors. Replacement poles would meet the APLIC suggested practices for avian protection on power lines (APLIC 2006).

With implementation of APM-BIO-1 (preconstruction surveys), APM-BIO-6 (Environmental Monitor during construction activities and consultation with CDFW regarding avoidance measures), APM-BIO-7 (avoid impacts to active nests, should any occur), APM-BIO-8 (Worker Environmental Awareness Program), and APM-BIO-9 (bird surveys/impact assessment and line marker placement, and avian protection), and because none of these special-status raptors are expected to nest within the BSA, adverse impacts to these special-status raptor species, as well as common raptor species, will be avoided.

Nesting Bird Species

No Impact. Harm to or destruction of individual native bird species, or active nests of such species, is prohibited by the federal Migratory Bird Treaty Act and by various sections of the California Fish and Game Code. Suitable foraging habitat exists for two non-raptorial special-status bird species (willow flycatcher and great blue heron (*Ardea herodias*)) with some potential to occur in the BSA. While great blue heron is not expected to nest in or adjacent to the BSA or the immediate project area due to the lack of suitable trees for this colonially nesting species within the BSA, some riparian scrub and wet meadow habitat suitable for willow flycatcher nesting occurs within and adjacent to portions of the BSA. If vegetation clearing and other ground-disturbing activities occurred during the nesting season of willow flycatcher, these activities could result in destruction of active nests or, if within close proximity to active nests, abandonment of the nests by the adult birds. However, with implementation of APM-BIO-1 (preconstruction surveys), APM-BIO-3 (minimize vegetation impacts), APM-BIO-4 (minimize riparian disturbance), APM-BIO-5 (temporary access to wetlands), APM-BIO-6 (Environmental Monitor during construction activities and consultation with CDFW regarding avoidance measures if a special-status species is located within proposed disturbance areas), APM-BIO-8 (WEAP), APM-BIO-10 (restriction to established roadways and access routes), APM-BIO-12 (broadcast surveys for willow

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

flycatcher and 150-foot setbacks from observed detections), and APM-BIO-13 (Operation and maintenance activities within or near willow flycatcher habitat to be conducted outside the willow flycatcher nesting season), significant adverse impacts to this special-status species are expected to be avoided. Therefore, no adverse impacts are expected to occur on either of these bird species.

The trees, shrubs, ruderal vegetation, and other structures in the BSA and the immediate project area provide suitable nesting habitat for a number of common bird species. Vegetation clearing and other ground-disturbing activities, if conducted within the avian nesting season (late February to August), could result in the destruction of or harm to active bird nests. If construction occurs during the nesting season, APM-BIO-7 requires that the construction area be surveyed for active nests prior to initiation of construction activities. If active nests are located, pursuant to APM-BIO-7 appropriate avoidance buffers would be established until all young have successfully fledged from the nest. With implementation of APM-BIO-7, APM-BIO-6 (Environmental Monitor during construction activities and consultation with CDFW regarding avoidance measures), and APM-BIO-8 (WEAP), no adverse impacts to nesting bird species are expected to occur.

Larger birds flying low over the site, especially species such as herons and egrets that could be foraging along the agriculture drainages and wetlands and/or open grasslands in the BSA, could collide with transmission lines or be electrocuted if perching on transmission poles or conductors. APM-BIO-9 requires that an impact assessment be conducted pursuant to APLIC's 1994 survey protocol and in consultation with CDFW to identify locations where bird collisions would potentially occur and to implement measures suggested by APLIC guidelines to reduce collision potential. With implementation of APM-BIO-9, no adverse impacts to low-flying bird species are expected to occur.

Mammals

No Impact. Three special-status bat species have some potential to occur in the BSA: spotted bat (*Euderma maculatum*), western mastiff bat (*Eumops perotis californicus*), and silver-haired bat (*Lasionycteris noctivagans*). Spotted bats could forage over the open areas of the site and possibly roost in the existing substation that will be removed. Western mastiff bat and silver-haired bat could also forage over the open areas of the site as well as in on-site woodlands. These species could also roost on the larger trees in the BSA and the immediate project area. Focused surveys for roosts of these species would be conducted prior to the initiation of construction activities pursuant to APM-BIO-1. With implementation of APM-BIO-1, APM-BIO-6 (monitors during construction to ensure avoidance of impacts), and APM-BIO-8 (WEAP), no adverse impacts to these bat species are expected to occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The west coast fisher (*Pekania pennanti*) is the only terrestrial special-status mammal with some potential to occur in the BSA. While the species has been documented as occurring in the project vicinity, the potential of this species to occur in the BSA is considered low because it is typically found in denser forest habitat than is found in the fragmented and more open woodlands that occur in portions of the BSA. With implementation of APM-BIO-1 (preconstruction surveys), APM-BIO-6 (Environmental Monitors during construction activities), APM-BIO-8 (WEAP), and APM-BIO-11 (restrictions on vehicles, trash, firearms, and pets), adverse impacts to this special-status mammal species are not expected to occur.

Invertebrates

No Impact. Six invertebrate species have some potential to occur in the BSA: Suckley's cuckoo bumblebee (*Bombus suckleyi*), confusion caddisfly (*Cryptochia shasta*), Castle Crags rhyacophilan caddisfly (*Rhyacophila lineata*), bilobed rhyacophilan caddisfly (*R. mosana*), Siskiyou hesperian (*Vespericola sierranus*), and leaden slug (*Hesperarion plumbeus*). Five of these species are associated with creeks and other wet areas, while the bumblebee is a nest parasite and occurs where other bumblebees occur. With implementation of APM-BIO-4 (avoidance of streambeds and banks), APM-BIO-5 (use of driving mats and portable road platforms to minimize impacts to wetlands and streams), APM-BIO-6 (Environmental Monitor during construction activities and consultation with CDFW regarding avoidance measures), APM-BIO-8 (WEAP), and APM-BIO-10 (restriction to established roadways and access routes), no adverse impacts to these species are expected to occur.

Significance After Mitigation: Impacts would be less than significant with mitigation incorporated.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Less Than Significant Impact. The riparian scrub and montane meadow habitat that occur in the BSA are considered "sensitive natural communities" as identified by CDFW (the freshwater marsh habitat on site is considered a wetland habitat and is addressed below). Ground and vegetation clearing for access to pole sites and pole replacement has the potential to remove plant material associated with these habitat types. However, the actual footprint of impacts associated with this loss is expected to be minimal and would be further minimized to the greatest extent feasible with APM-BIO-3. Invasive plants may compete with native vegetation for resources and may also change the local fire

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

regime. Implementation of APM-BIO-2 (vehicle undercarriage washing) will minimize the potential for construction vehicles and equipment to carry non-native vegetation into the project area. Implementation of APM-BIO-4 (avoidance of streambeds and banks), APM-BIO-5 (temporary wetland access), APM-BIO-6 (environmental monitors during construction), and APM-BIO-8 (WEAP) will further minimize potential impacts to riparian and montane meadow communities. With implementation of these APMs, adverse impacts to riparian and montane meadow vegetation would be largely avoided and minimized; impacts would therefore be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- c) *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Less Than Significant Impact. Permanent impacts to wetlands would consist of placing fill, in the form of new poles and backfill materials, in wetlands. The new poles would be 19 inches in diameter with a permanent footprint of 1.77 square feet per pole, once installed. North of the existing Mount Shasta Substation, 14 poles would be replaced in wetlands, including 8 poles that would be replaced in a wetland mitigation area (Morgan–Merrill Wildlife Preserve, as discussed in the Jurisdictional Delineation Report (PacifiCorp 2015, Appendix D)). Installation of these 14 poles would result in permanent impacts of 28.58 square feet (0.0007 acres) within jurisdictional wetland areas. However, each of the upgraded wooden poles replaces an existing older wooden pole on a 1:1 basis and in a location close (estimated to be within 5 to 8 feet) to the existing pole. Once the existing poles are removed, the remaining habitat area where the poles were removed is expected to revert to wetland habitat with functions and values representative of the existing surrounding habitat. Consequently, the reversion of the existing pole locations to wetland habitat is expected to offset the loss of wetlands associated with the installation of the new poles such that no net loss of wetland acreage and associated functions and values would occur.

In general, removal of wetland vegetation can potentially alter wetland ecosystems and result in localized erosion and filling of waters or wetlands downgradient from a site through sedimentation. However, as noted in Section 5.4.1, Environmental Setting, most of the wetland habitat potentially impacted is characterized as wet montane meadow habitat within the proposed ROW and is heavily grazed; it is also within relatively flat terrain. In addition, the amount of habitat to be permanently removed in

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

association with new pole installations would total only 28.58 square feet. Furthermore, soil and earth extracted from the new pole locations would be used to fill the holes left from the extraction of the nearby existing poles; any excess soil and earth would be hauled from the site. Therefore, because of the very small amount of wetland habitat to be removed, and because no local or downgradient sedimentation would occur as a result of new pole installation, impacts associated with the project are not expected to alter wetland ecosystems or result in localized erosion and filling of waters or wetlands downgradient from the site through sedimentation.

Temporary impacts would potentially occur due to result from ground disturbance as a result of associated with temporary access to pole sites and disturbance of wetlands habitat within the work area during construction-pole installation activities, including removal of the distribution line adjacent to Cold Creek in the Morgan-Merrill Wildlife Preserve. Specifically, construction vehicles and equipment could create ruts or compress soils in wetland areas within the work area of each pole location. This could, resulting in a total temporary disturbance area of 1.978 acres (86,165.6 square feet) in wetlands within the montane meadow wetland habitat. Construction vehicles and equipment could create ruts or compress soils in wetland areas. Removal of wetland vegetation could alter wetland ecosystems and result in localized erosion and filling of waters or wetlands downgradient from the site through sedimentation. However, because the new poles would be installed adjacent to the existing poles and because these pole locations would occur along an existing maintenance access route, few temporary impacts associated with pole installation work areas and access to these areas would occur. Furthermore, a number of APMs are proposed to avoid and/or minimize the potential for adverse impacts on wetland habitats. Specifically, with implementation of APM-BIO-3 (minimize vegetation impacts, revegetate impacted areas), APM-BIO-5 (use of special access methods to avoid/minimize temporary impacts to wetlands due to access), APM-BIO-6 (Environmental Monitors during construction to ensure avoidance of native vegetation and unique resources), APM-BIO-8 (WEAP), and APM-BIO-10 (restriction to established roadways and access routes), temporary impacts to wetland areas would be avoided and/or minimized. In particular, APM-BIO-5 stipulates that HDPE driving mats, portable road platforms, or similar technologies would be used to minimize temporary impacts to wetland vegetation and soils due to vehicle access to pole replacement sites. Because of the short duration associated with removal of existing poles and installation of new poles, any compressed vegetation is expected to recover in a very short time.

As noted in Section 5.4.3, Applicant Proposed Measures, APMs are intended to minimize the potential for impacts resulting from construction, operation, and maintenance of the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

proposed project before such impacts can occur. With implementation of these measures before and during construction-related activities within identified wetland habitat areas, temporary impacts associated with pole installation work areas and access are expected to be offset by these APMs.

~~Given the nature of the proposed project and the location of the ROW, impacts to small areas of wetlands resulting from pole placement cannot be avoided. However, with implementation of APM BIO 3 (minimize vegetation impacts), APM BIO 5 (temporary wetland access), APM BIO 6 (Environmental Monitors during construction), APM BIO 8 (WEAP), and APM BIO 10 (restriction to established roadways and access routes), impacts to these wetlands would be minimized. Because of the very small anticipated permanent loss of jurisdictional wetlands (0.007 acres), this loss is not considered a substantial adverse effect on federally protected wetlands.~~

As previously noted, Cold Creek and its associated riparian habitat, banks, and streambed would be avoided by the proposed project; therefore, no impacts to Cold Creek are expected to occur. Should proposed project circumstances change such that avoidance of the creek becomes infeasible, PacifiCorp would consult with the CDFW and, if required, obtain a Streambed Alteration Agreement pursuant to APM-BIO-4 in compliance with Section 1602 of the California Fish and Game Code.

In summary, (1) much of the wetland habitat where poles would be installed is relatively disturbed due to heavy grazing; (2) no threatened/endangered plant or animal species are known to occur within the areas of wetland habitat to be impacted by pole installation; (3) the wetland habitats that would receive new poles do not hydrologically or ecologically support rare habitats such as vernal pools; (4) no net loss of wetland habitat acreage or functions and values is expected to occur since the locations where the existing poles would be removed are expected to revert to wetland habitat at a similar square footage and with similar functions and values as the habitat that would be impacted by the new poles; (5) the total amount of permanent impacts (28.58 square feet) associated with pole installation and the potential temporary impacts (1.97 acres) associated with vehicle access and pole installation work areas is quite small in relation to the amount of existing wetland habitat within the ROW; and (6) implementation of the proposed APMs included in this Initial Study/Mitigated Negative Declaration is expected to either avoid or substantially minimize the potential for temporary impacts associated with pole installation. Potential impacts on wetland habitats as a result of the proposed project are not expected to rise to the level of a substantial adverse impact. Therefore, ~~impacts~~ ~~Impacts~~ on federally protected wetlands under the proposed project would be less than significant.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- d) *Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Less Than Significant. The project site and surrounding area is not known to be, and has never been documented as, a migratory movement corridor for wildlife or to function as an important habitat linkage between large open space areas, particularly given the relatively high level of human activity in the area (e.g., the presence of paved roads and associated traffic, rural residential homes, and recreational uses). Due to the relatively small footprint (disturbance area) of the structures, the large spans between structures, and the open landscape in which the project area is currently located, the project as proposed would not interfere substantially with the movement of any wildlife species after all structures have been installed.

During construction, temporary construction-related noise may have the potential to disrupt local movement patterns and activities for some diurnal resident wildlife species; nocturnal species are not expected to be affected. However, such disruption would be temporary, and movement activities and patterns by resident species would be expected to return to baseline levels once construction is completed.

With implementation of APM-BIO-1 (preconstruction surveys), APM-BIO-3 (avoid/minimize natural vegetation impacts), APM-BIO-6 (Environmental Monitor during construction activities and consultation with CDFW regarding avoidance measures), APM-BIO-7 (avoid impacts to active nests, should any occur), and APM-BIO-8 (WEAP), loss of natural vegetation is expected to be minimized and potential impacts to nesting bird and bat species will be avoided.

Therefore, the proposed project is not expected to interfere substantially with the movement of any native migratory fish or wildlife species, with established resident or migratory wildlife corridors, or impede the use of native wildlife nursery (nest) sites. Impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No Impact. The Conservation Element of the Siskiyou County General Plan includes general objectives relating to biological resources. These objectives include (1) to preserve, protect and manage the Forest Lands as both wild habitat and a productive economic resource and (2) to preserve and maintain streams, lakes and forest open space as a means of providing natural habitat for species of wildlife. The proposed project would comply with these general objectives by (1) using the existing ROW for the majority of the project, (2) completely avoiding construction on forest lands and near lakes, and (3) implementing measures to minimize/avoid impacts on wetlands, riparian zones, and streams.

The Open Space and Conservation Element of the City of Mount Shasta General Plan include the following Objectives and Programs for the Conservation of Natural Resources: (1) conserve lands that support important fisheries, wildlife and botanical habitat, and wetlands; (2) protect riparian habitat along streams in the Planning Area; and (3) conserve wetland areas. The proposed project would comply with these objectives by (1) using the existing ROW for the majority of the project; (2) implementing measures that avoid impacts on native wildlife species, particularly special-status species, and that avoid/minimize the loss of natural vegetation; (3) avoiding construction on/within Cold Creek; and (4) implementing measures that avoid/minimize impacts on wetland areas (a total of 0.007-acre impact on wetlands).

The City maintains a City Tree Ordinance with the stated purpose being the control, management, conservation and planting of City trees to enhance the appearance of the City, and protection of related economic and environmental resources. The Tree Ordinance is only applicable to trees in the public ROW and in commercial and industrial zones. Nevertheless, the project includes measures that minimize/avoid the loss of trees within the project ROW.

Given that the project design and associated measures avoid/minimize impacts to natural resources in and adjacent to the project area, **no impact** relating to conflict with local policies or ordinances would result from approval and implementation of the proposed project.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The proposed project is not located within the boundaries of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

A portion of the transmission line upgrade, beginning midway between Pole 12/48 and Pole 13/48 and continuing north to Hatchery Lane, consists of natural and created wetlands and non-wetland natural areas that were previously set aside as wetland mitigation (Theiss and Associates 1990). In 2000, this property was declared the Morgan–Merrill Wildlife Preserve (County of Siskiyou 2000) as part of that mitigation plan. The purpose of the wildlife preserve is to ensure that the protected area would be retained in its natural wetland and open space condition in perpetuity.

As previously discussed, eight poles within the Morgan–Merrill Wildlife Preserve will be replaced. PacifiCorp design standards require a ROW that is 50 feet wide for a 115 kV transmission line. The existing ROW for the 69 kV transmission line varies from 50 feet to 75 feet wide; therefore, the new 115 kV line into the proposed new substation would not require new easements for the pole upgrade portion of the project. In addition, implementation of APM-BIO-3 (minimize vegetation impacts), APM-BIO-5 (temporary wetland access), APM-BIO-6 (Environmental Monitors during construction), APM-BIO-8 (worker environmental awareness program), and APM-BIO-10 (restriction to established roadways and access routes) will minimize/avoid impacts to wetland areas. Finally, the total amount of permanent impact to wetlands within the wildlife preserve would be less than 0.005 acres. Therefore, the proposed project would not be considered a substantial adverse effect on the Morgan–Merrill Wildlife Preserve and would not conflict with the overall focus of the area as a preserve.

Consequently, **no impact** would occur from implementation of the proposed project relating to conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

5.4.5 References Cited

16 U.S.C. 703–712. Migratory Bird Treaty Act, as amended.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.5 Cultural Resources

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| CULTURAL RESOURCES – Would the project: | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.5.1 Environmental Setting

Summary of Inventory Efforts

The literature review and records search for the Lassen Substation Project (project) was conducted at the Northeast Information Center of the California Historical Resources Information System in 2011 and 2015. Native American Heritage Commission (NAHC) Sacred Lands File searches were completed in 2011 and 2014, and were followed-up by letters sent to NAHC-listed Native American representatives requesting additional information. Northeast Information Center records identified 44 recorded cultural resources located within 0.5 miles of the project site, none of which intersected project components.

Archaeological and built environment inventory efforts resulted in identifying two sites within the project study area. These historical-era resources, consisting of a single-family home constructed in 1960 (504 South Old Stage Road) and a section of metal pipe (JM-ISO), were both recommended as not eligible for listing in the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP). Documentation and methods met appropriate standards. Technical studies have sufficiently demonstrated that the project would not directly impact any significant archaeological or built-environment resources (historical resources), and the project as currently designed would not result in significant impacts to cultural resources.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

504 South Old Stage Road

This structure was evaluated by a qualified architectural historian as not eligible for listing in the Siskiyou County Register, not eligible for listing in the CRHR under Criteria 1–4, and not eligible for listing in the NRHP under Criteria A–D.

JM-ISO

This isolated resource consists of an early 20th century riveted metal water pipe segment. This resource meets the definition of an archaeological isolate, and requires no additional consideration beyond the recordation completed as part of the technical study.

The pedestrian survey conducted for the project was intensive-level and met Office of Historic Preservation and Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44720–44726) and the California Office of Historic Preservation Planning Bulletin Number 4(a). Current conditions of the project study area were observed and documented. Resource documentation met appropriate standards for non-significant built-environment resources through preparation of a technical report and Department of Parks and Recreation (DPR) 523 A and B series forms. Both the technical report and these DPR forms appropriately addressed the significance of the resources.

Cultural Context

Prehistoric Period

This section describes human occupation in a chronological order in the project region. The project area is situated within a portion of the Shasta Valley. Due to the dearth of available information for this area, and the complexity of shifting tribal use areas in the Late Prehistoric Period, the chronology for this area is largely based on studies for the surrounding region.

Paleoindian (Pre-8000 BP)

There is little direct evidence for Pleistocene or Post-Pleistocene period occupation of this area. In general, the Paleoindian assemblage includes large proportions of lithic points and tools associated with hunting and processing large game. The assemblage includes a relatively small proportion of groundstone tools (Wallace 1978).

Early Archaic (8000–5000 BP)

The earliest period of occupation in the northern Sacramento Valley region is represented by the Early Archaic. This began with a general increase in temperature during the Holocene related to

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

the Altithermal. This resulted in a recession of lake and wetland areas, and a general expansion of shrubby and drought-resistant vegetation communities. Increased temperatures and reduced water availability resulted in tribal communities migrating to take advantage of more abundant usable plants, game, and fish. Projectile points tended to be large and wide-stemmed, and most were probably used with atlatls and spears. Groundstone tools first used in any frequency during this period indicate an increased reliance on seeds for subsistence (BLM 1997; Wallace 1978).

Middle Archaic (5000–2500 BP)

During the Middle Archaic period, settlement patterns remained relatively stable, but tool kits began to become more elaborate and included small unifacial foliate and bifacial stemmed projectile points and darts (BLM 1997; Theodoratus 1981).

Late Archaic/Transitional Period (2500–1500 BP)

In general, the Late Archaic in this area was marked by increased use of acorns for food, as indicated by the increased prevalence of mortars and pestles, and an increased use of major drainages and valleys. Medium-sized side-notched and corner-notched projectile points became part of the assemblage (Theodoratus 1981).

Shasta Complex (1500–150 BP)

Based on current evidence of proto-historic patterns, it is suggested that cultures were entrenched in local traditions by at least 1000 BP and possibly as early as A.D. 500 (Elsasser 1978; King 1978; Sundahl 1998). Very little information relating to cultural or social structure of the Okwanuchu is available. Clem Meighan developed the Shasta Complex through excavations at the Shasta Dam and along the lower McCloud River. This period represented the introduction of bow and arrow technology. This assemblage is generally attributed to the Shastan-cultural group, and included Gunther Series and Desert Side-notched points, hopper basket mortars and pestles, sandstone arrow-shaft straighteners/abraders, shell and bone artifacts, and pinenut beads (Sundahl 1998). This period marked a transition toward greater exploitation of acorns, but also remained heavily invested in salmon fishing and hunting. Two or more tribal groups may have occupied portions of this territory during this period. As such, there has been some discussion if the Shasta Complex is associated with the Wintu, Yana, or Okwanuchu (Shastan tribe) (BLM 1997).

Ethnographic Period

The history of the Native American communities prior to the mid-1700s has largely been reconstructed through later mission-period and early ethnographic accounts. The first records of the Native American inhabitants of the region come predominantly from European merchants,

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

missionaries, military personnel, and explorers. These brief, and generally peripheral, accounts were prepared with the intent of furthering colonial and economic aims, and were combined with observations of the landscape.

Tribes in this region did not become the focus of formal or in-depth ethnographic study until the late 19th century by researchers including Robert B. Dixon, C. Hart Merriam, Stephan Powers, and Alfred Kroeber (Golla 2011). The work of these individuals was not intended to be unbiased accounts regarding the cultural structures and community practices of the newly encountered cultural groups. The principal intent of these researchers was to record the precontact, culturally specific practices, ideologies, and languages that had survived the destabilizing effects of missionization, colonialism, and, later, the Euro-American influx driven by the promise of gold and land. This research, often understood as “salvage ethnography,” was driven by the understanding that traditional knowledge was being lost due to the impacts of modernization and cultural assimilation.

Based on ethnographic information, it is believed that at least 88 different languages were spoken from Baja California Sur to the southern Oregon border at the time of Spanish contact. The distribution of recorded Native American languages has been dispersed as a geographic mosaic across California through six primary language families (Golla 2007). As the project area is located immediately west of Mount Shasta, the Native American inhabitants of the region would have spoken an Okwanuchu variation of the Shastan language group, which is part of the Hokan language phylum. Golla has suggested that the time depth of Hokan is approximately 8,000 years (Golla 2007). Being the oldest documented linguistic group in present California, Hokan-speaking populations have been divided by a series of subsequent population movements over the millennia. This has resulted in a number discrete Hokan-speaking tribal areas throughout California and Baja, Mexico. The Shastan-speaking tribes are geographically adjacent to three other tribal cultural-linguistic areas where the languages are rooted in Hokan (including the Chimariko, Karuk, Yana, Achumawi, and Atsugewi) (Golla 2007).

The project area is located within the geographic area traditionally inhabited by the Okwanuchu tribe, a subgroup of the Shastan cultural-linguistic group (Golla 2011; Kroeber 1925; Moratto 2004). The Shastan-speaking cultural-linguistic area includes the Shasta, Konomihu, Okwanuchu, and New River Shasta tribes (Heizer 1978; Kroeber 1925). The boundaries of the Shastan linguistic area have been provided by Heizer as follows:

The Shasta occupied land from around Jacksonville, Oregon, in a swath of land that roughly followed the southern upper Rogue River watershed southeast towards Beswick, California, encompassing parts of the upper Klamath River watershed, including Jenny Creek. This territory then widened westward toward Seiad Valley along the Klamath River watershed, then the limit headed south to

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

the Salmon Mountains and to Callahan, California. The territorial limit then progressed eastward to Mt. Shasta and back north to Beswick. The Okwanuchu occupied portions of the upper Sacramento and McCloud watersheds south of Mt. Shasta and including the southeastern corner of the Shasta territory described above. The New River Shasta and Konomihu lived in an area surrounding Cecilville, 40 miles to the southwest of the Shasta area described above, and surrounding the north, east, and south forks of the Salmon River, as well as the upper New River watershed (Heizer 1978).

The language and culture of the tribes surrounding the project area have been subject to very limited previous research. The language of the Okwanuchu is based on a list of approximately 75 words documented by Merriam in 1925 (Golla 2011). The Okwanuchu traditionally occupied the mountain region dominated by coniferous forest. Okwanuchu territory extended from south of present-day Weed along/across the upper Sacramento and middle McCloud Rivers to approximately Bully Hill. This territory is partially substantiated by the term of the neighboring Achumawi and Atsugewi, which was *ikasawdewi*, or *yeti*, referring to Mount Shasta (Kroeber 1925: 284). Archaeological evidence suggests that portions of the Okwanuchu, notably those along the middle McCloud River, were subsumed by an expansion of the Wintun cultural area between 1000–500 years BP, then by a more recent expansion by the Achumawi (Sundahl 1998).

Historic Period

The first Euro-Americans to enter the region appear to have been a company of Hudson Bay trappers and traders led by Peter Skene Ogden during the winter of 1826–1827 (BLM 1997). Continuing throughout the following two decades, trappers associated with the Hudson Bay Company were quite active within Shasta tribal territory. Alexander McLeod and his party of trappers are reported to have traveled through Shasta Valley in 1828–1830, and they established camps on the McCloud and Klamath Rivers (BLM 1997). Slightly later, Colonel John C. Fremont was directed by the U.S. government to explore the area. Mount Shasta was a landmark on the Siskiyou Trail, which began as an ancient trade route between what is now California's Central Valley and the Pacific Northwest (BLM 1997). By 1841, scientists and cartographers with the United States Exploring Expedition travelled through the area via the Siskiyou Trail.

The influx of Euro-American miners during the initiation of the gold rush (discovered along local rivers in the 1850s) resulted in the displacement of Native American communities throughout the region. Mining had a number of detrimental effects to the environment, including the lower availability of salmon (BLM 1997). This resulted in the shifting of tribal populations away from their traditional use areas. New roads and trails were established, including the Siskiyou Trail and California to Oregon Trail through Shasta Valley. The Old Stage Road was

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

initially one of the early, well-used trails. Lindsey Applegate, who traveled along this route in 1849, noted that it was a difficult passage (Dice 2015). Seven years later, Ross McCloud improved the trail, which later became an active wagon road (SCSC 2002). Additional access was enabled shortly after by the completion of the Southern Pacific Railroad and McCloud River Railroad through this area (SCSC 2002). This resulted in further growth of local Euro-American populations to support mining, logging, ranching, and other industries.

Paleontological Context

Mount Shasta has erupted approximately every 600 years since the Early Holocene (last 8,000 years) (McClung 2005). The most recent of these events occurred in 1786, during which pyroclastic material and mudflow moved down-slope by route of Ash Creek and Mud Creek. These events resulted in the depositions of Holocene-era deposits with little potential to contain focalized paleontological resources. This area was subject to volcanic activity approximately 600,000 years ago. A landslide flowed northwestward into Shasta Valley down along the northern face of Mount Shasta as recently as 360,000 years ago (Hirt 2004).

Native American Correspondence

The NAHC was contacted in October 2011 and November 2014 with requests to search its Sacred Lands File. Both searches failed to indicate the presence of Native American resources within or surrounding the project area. The NAHC provided a contact list of NAHC-listed tribal representatives who have been identified as possibly having additional information relating to Native American resources in the vicinity of the project area. Letters were sent to NAHC-listed tribal representatives in October 2011 and December 2014. Follow-up calls were also made. No responses were received regarding these outreach attempts. The following individuals were contacted as part of these outreach efforts in 2011, without response:

- Harold Bennett, Chairperson, Quartz Valley Indian Community
- Yvette Lewis, Cultural Resources Coordinator, Quartz Valley Indian Community
- Rebekah Sluss, Environmental Coordinator, Quartz Valley Indian Community
- Athena Calico, Vice Chairperson, Shasta Indian Nation
- Mary Carpelan, Cultural and Archaeological Resources, Shasta Nation
- Roy Hall, Jr., Chairperson, Shasta Nation

The following NAHC-listed representatives were contacted in 2014, without response:

- Aaron Peters, Chairperson, Quartz Valley Indian Community

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- Evette Lewis, Cultural Resources Coordinator, Quartz Valley Indian Community
- Rebekah Sluss, Environmental Coordinator, Quartz Valley Indian Community
- Mary Carpelan, Cultural and Archaeological Resources, Shasta Nation
- Roy V. Hall Jr., Chairperson, Shasta Nation
- Sami Jo Difuntorum, Cultural Resources, Shasta Indian Nation and Administrator, Butte Valley Indian Community

5.5.2 Regulatory Setting

The following section provides federal and state cultural resources regulatory information. Although only California Environmental Quality Act (CEQA) and local regulatory conditions apply to the project, federal laws have been included for reference should federal consultation with the State Historic Preservation Office be required.

Federal

National Register of Historic Places

The NRHP is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Overseen by the National Park Service under the U.S. Department of the Interior, the NRHP was authorized under the National Historic Preservation Act, as amended. Its listings encompass all National Historic Landmarks and historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide state and local governments, federal agencies, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing, it must be demonstrated to possess integrity and to meet at least one of the following criteria:

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in the NRHP guidance, How to Apply the National Register Criteria, as “the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity” (NPS 1995). NRHP guidance further states that properties be completed at least 50 years ago to be considered for eligibility. Properties completed fewer than 50 years before evaluation must be proven to be “exceptionally important” (criteria consideration G) to be considered for listing.

A historic property is defined as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria” (36 Code of Federal Regulations (CFR) Section 800.16(i)(1)).

Effects on historic properties under Section 106 of the National Historic Preservation Act are defined in the assessment of adverse effects in 36 CFR 800.5(a)(1):

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Adverse effects on historic properties are clearly defined and include the following:

- i) Physical destruction of or damage to all or part of the property;
- ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines;

- iii) Removal of the property from its historic location;
- iv) Change of the character of the property's use or of physical features within the property's setting that contributes to its historic significance;
- v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance (36 CFR 800.5(2)).

To comply with Section 106, the criteria of adverse effects are applied to historic properties if any exist in a project's area of potential effects, pursuant to 36 CFR 800.5(a)(1). If no historic properties are identified in the area of potential effects, a finding of "no historic properties affected" will be made for the proposed project. If there are historic properties in the area of potential effects, application of the criteria of adverse effect would result in project-related findings of either "no adverse effect" or "adverse effect." A finding of no adverse effect may be appropriate when the undertaking's effects do not meet the thresholds for the criteria of adverse effect (36 CFR 800.5(a)(1)), in certain cases when the undertaking is modified to avoid or lessen effects, or if conditions were imposed to ensure review of rehabilitation plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (codified in 36 CFR, Part 68).

If adverse effects findings were expected to result from the proposed project, mitigation would be required, as feasible, and resolution of those adverse effects by consultation may occur to avoid, minimize, or mitigate adverse effects on historic properties pursuant to 36 CFR, Part 800.6(a).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California

California Register of Historical Resources

In California, the term “historical resource” includes “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code Section 5020.1(j)). In 1992, the California legislature established the CRHR “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (California Public Resources Code Section 5024.1(a)). The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP.

According to California Public Resources Code Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains “substantial integrity,” and (ii) meets at least one of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluation of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California Environmental Quality Act

As described further below, the following CEQA statutes and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources:

- California Public Resources Code Section 21083.2(g) defines “unique archaeological resource.”
- California Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines “historical resources.” In addition, CEQA Guidelines Section 15064.5(b) defines the phrase “substantial adverse change in the significance of an historical resource”; it also defines the circumstances when a project would materially impair the significance of a historical resource.
- California Public Resources Code Section 21074(a) defines “tribal cultural resources.”
- California Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- California Public Resources Code Sections 21083.2(b)–(c), and CEQA Guidelines Section 15126.4, provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation-in-place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site.

Under CEQA, a project may have a significant impact on the environment if it may cause “a substantial adverse change in the significance of an historical resource” (California Public Resources Code Section 21084.1; 14 CCR 15064.5(b)). If a site is either listed or eligible for listing in the CRHR, or if it is included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of California Public Resources Code Section 5024.1(q)), it is a “historical resource” and is presumed to be historically or culturally significant for purposes of CEQA (California Public Resources Code Section 21084.1; 14 CCR 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (California Public Resources Code Section 21084.1; 14 CCR 15064.5(a)).

A “substantial adverse change in the significance of an historical resource” reflecting a significant impact under CEQA means “physical demolition, destruction, relocation, or alteration

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (14 CCR 15064.5(b)(1); California Public Resources Code Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project would do any of the following:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (14 CCR 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any “historical resources,” then evaluates whether that project would cause a substantial adverse change in the significance of a historical resource such that the resource’s historical significance would be materially impaired.

If it can be demonstrated that a project would cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (California Public Resources Code Section 21083.2(a)–21083.2(c)).

California Public Resources Code Section 21083.2(g), defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Impacts to non-unique archaeological resources are generally not considered a significant environmental impact (California Public Resources Code Section 21083.2(a); 14 CCR 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as a tribal cultural resource (California Public Resources Code Sections 21074(c), 21083.2(h)), further consideration of significance is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains, and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in California Public Resources Code Section 5097.98.

California Health and Safety Code

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains can occur until the County coroner has examined the remains (Health and Safety Code Section 7050.5b). California Public Resources Code Section 5097.98, also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe that the remains are those of a Native American, the coroner must contact the California NAHC within 24 hours (Health and Safety Code Section 7050.5c). The NAHC will notify the most likely descendant. With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by the NAHC. The most likely descendant may recommend the means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

5.5.3 Applicant Proposed Measures

No applicant proposed measures were identified for the proposed project. No additional mitigation, including archaeological monitoring, would be necessary. In the event that yet-to-be identified cultural or paleontological resources are encountered, work would halt in the vicinity of the find. Prior to any additional impacts, the lead agency and a qualified specialist would be contacted, and, as discussed above, the processes outlined by CEQA for significance evaluation

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

of resources would be implemented. Should human remains be identified, work would be halted in the vicinity and procedures outlined in California Public Resources Code Section 5097.98 would be implemented.

5.5.4 Environmental Impacts and Mitigation

- a) *Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?*

Less Than Significant Impact. A non-eligible structure was identified at 504 South Old Stage Road. This structure was evaluated by a qualified architectural historian as not eligible for listing in the Siskiyou County Register, not eligible for listing in the CRHR under Criteria 1–4, and not eligible for listing in the NRHP under Criteria A–D. Documentation met the standards for non-significant built-environment resources through preparation of a technical report and DPR 523 A and B series forms. The technical report and the DPR forms were thorough and appropriately addressed the significance of the building; therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

Less Than Significant Impact. One archaeological resource was identified within the direct project footprint through Phase I cultural resources inventory efforts. This resource meets the definition of an archaeological isolate, and requires no additional consideration beyond the recordation completed as part of the prepared technical study. Impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- c) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

No Impact. The region has been subject to reoccurring natural disturbances and burial by Mount Shasta, which has erupted approximately every 600 years since at least the last 8,000 years. Geological evidence suggests that fossilized paleontological resources are

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

unlikely to be present, persist, or be encountered during construction; therefore, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

d) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

No Impact. Cultural resources archival research, intensive-level pedestrian survey, and correspondence with the NAHC and NAHC-listed Native American tribal representatives did not identify the presence, or receive information related to, human remains within the project area. Should human remains be discovered, project personnel would implement California Health and Safety Code Section 7050.5 and PRC Section 5097.98; therefore, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.6 Geology and Soils

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| GEOLOGY AND SOILS – Would the project: | | | | |
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii) Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv) Landslides? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.6.1 Environmental Setting

Topography

The proposed the Lassen Substation Project (project) is located in the Strawberry Valley, which is at the southwest base of Mount Shasta and surrounded by Black Butte to the north, Rainbow Ridge to the west, and Lake Siskiyou and the Sacramento River Canyon to the south. The proposed project alignment is on flat to nearly flat terrain at an elevation that ranges from almost 3,700 feet above mean sea level (amsl) at the northern edge of the distribution line component (near Ski Village Drive) to 3,400 feet amsl at the southern end of the alignment (at West Ream

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Avenue) (Google Earth 2016). The overall trend of topography is to decrease in a southerly direction along the north-south axis of Strawberry Valley, with an average slope gradient of 4%—generally 2% or less in the southern half of the alignment and 10% or less in the northern half of the alignment (Google Earth 2016). The proposed substation site is at an elevation of approximately 3,415 feet amsl, and the ground surface slopes slightly downward at less than 2.5% to the west (PSI 2011).

Geology and Soils

The proposed project site is located within an alluvial floodplain near the southern end of Shasta Valley that consists of several converging tributaries, including Cold Creek (PSI 2011). The geology underlying the project site consists of Quaternary-aged alluvium composed of clay, silt, sand, and gravel derived from the surrounding volcanic peaks (CGS 2010a; PSI 2011). Table 5.6-1 shows the soil units underlying the proposed project alignment, including pertinent soil characteristics (PacifiCorp 2016a). The Diyou and Odas soil units are poorly drained and have high runoff ratings, and this area is reported to have high groundwater (PacifiCorp 2015).

Borings advanced as part of the geotechnical investigation for the proposed substation site (mapped as Ponto-Neer complex) show the subsurface consists of a thin layer of sandy silt underlain by medium dense to very dense, poorly graded sandy soils containing cobbles and boulders. Free groundwater was encountered at shallow depths, with saturated soil conditions occurring at a depth of 1 to 2.5 feet below the ground surface (PSI 2011).

Table 5.6-1
Soil Units and Characteristics

| Soil Unit | Slope Gradient | Expansion Index | Erosion Hazard | Suitability for Roads | Drainage Class | Hydrologic Group | Acres in Project Footprint |
|-----------------------------|----------------|-----------------|----------------|-----------------------|------------------------------|------------------|----------------------------|
| Deetz gravely loamy sand | 0%–5% | None to low | Slight | Well suited | Somewhat excessively drained | A | 3.3 (12%) |
| Deetz gravely loamy sand | 5%–15% | None to low | Moderate | Moderately suited | Somewhat excessively drained | A | 3.2 (12%) |
| Diyou Loam, Peat Substratum | 0%–2% | Low to moderate | Slight | Moderately suited | Somewhat poorly drained | C | 10.9 (39%) |
| Odas Sandy Loam | 0%–2% | Low to moderate | Slight | Well suited | Poorly drained | D | 1.2 (4%) |
| Ponto-Neer Complex | 2%–15% | None to low | Slight | Moderately suited | Well drained | B | 9.1 (33%) |

Source: PacifiCorp 2016b.

Hydrologic Group Ratings

A Soils having a high infiltration rate when thoroughly wet. These consist mainly of deep, well-drained to excessively drained sands or gravelly sands. These soils have a high rate of water transmission.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- B Soils having a moderate infiltration rate when wet. These consist chiefly of moderately deep or deep, moderately well-drained or well-drained soils that have moderately fine texture to moderately coarse texture. These soils have a slow rate of water transmission.
- C Soils having a slow infiltration rate when thoroughly wet. These consist chiefly of soils having a layer that impedes the downward movement of water or soils of moderately fine texture or fine texture. These soils have a slow rate of water transmission.
- D Soils having a very slow infiltration rate (high runoff potential) when thoroughly wet. These consist chiefly of clays that have a high shrink-swell potential, soils that have a high water table, soils that have a claypan or clay layer at or near the surface, and soils that are shallow over nearly impervious material. These soils have a very low rate of water transmission.

Faults and Seismicity

There are no Alquist–Priolo Earthquake Fault Zones or other known faults within or adjacent to the project site (CGS 2010b, 2016a). The nearest Alquist–Priolo Earthquake Fault Zone is more than 50 miles away in southeast Shasta County (CGS 2016a). According to the 2010 Fault Activity Map of California, there are several pre-Quaternary faults (older than 1.6 million years old) approximately 3 miles east of the project site, and two unnamed early Quaternary faults (between 700,000 and 1.6 million years old) on Mount Shasta 4 or more miles east and northeast of the project site (CGS 2010b). One is a north/south-trending fault running through the top of Mount Shasta, the other is an east/west-trending fault that runs from the top of Mount Shasta to a point north of Black Butte. The two early-Quaternary faults to the east and northeast of the project site are considered “potentially active” by the California Geological Survey because of the active volcanic status of Mount Shasta. Due to their considerable age and lack of evidence of activity in the Holocene period (i.e., last 10,000 years), these faults are not considered to be probable sources of future large-magnitude earthquakes.

Historically, there have been only two recorded earthquakes with a Richter magnitude of 4.0 or greater occurring in the immediate Mount Shasta area (City of Mount Shasta 2005). Review of earthquake records from 1800 to 1999 shows that no earthquakes magnitude 5.0 or larger have occurred in the project vicinity (PacifiCorp 2015).

Ground Shaking

Ground shaking, a general term referring to all aspects of motion of the earth’s surface resulting from an earthquake, is typically the major cause of damage in seismic events. As discussed above, there are no probable sources of large earthquakes in proximity to the project area, so the seismicity potential of the area is attributable to distant rather than nearby sources (e.g., active faults in eastern Siskiyou County, the coastal California region, and the Cascadia Subduction Zone).

The primary tool that seismologists use to evaluate ground-shaking hazard and to characterize statewide earthquake risk is a probabilistic seismic hazard assessment. The probabilistic seismic hazard assessment for California takes into consideration the range of possible earthquake sources and estimates their magnitudes to generate a probability map for ground shaking. A commonly used probabilistic seismic hazard assessment metric consists of the peak ground

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

acceleration (PGA)¹ that has a 10% probability of being exceeded in 50 years (i.e., a 1 in 475 chance). The PGA for the project area with a 10% chance being exceeded in a 50-year period is 0.206 (CGS 2016b). For context, this value is relatively low compared to more seismically active regions of California, but would produce a level of shaking sufficient to be widely felt, to move or topple unanchored objects, and to cause slight to moderate damage in ordinary structures (including broken chimneys). A PGA of 0.206 would be expected to result in negligible structural damage in buildings of good construction and designed to modern standards.

Liquefaction

Liquefaction causes soil to lose strength and “liquefy,” triggering structural distress or failure due to the dynamic settlement of the ground or a loss of strength in the soil underneath structures. Soil liquefaction can be caused by strong vibratory motion due to earthquakes. Research and historical data indicate that loose granular soils and non-plastic silts that are saturated by relatively shallow groundwater (generally less than 50 feet) are susceptible to liquefaction. For liquefaction to actually occur, the area must be subject to ground shaking of sufficient magnitude to trigger the effect.

Based on initial soil testing data for the proposed substation site, PSI found that the soil qualities on site are not conducive to liquefaction, but acknowledged that additional investigation and testing is warranted to confirm the liquefaction potential (PSI 2011). The proposed transmission alignment is also underlain by soils with a shallow groundwater table and, thus, may be subject to liquefaction risks.

Landslides

Slope failures include many phenomena that involve the downslope displacement and movement of material, triggered either by gravity or seismic (earthquake) forces. Exposed rock slopes may experience rockfalls, rockslides, or rock avalanches, and soil slopes may experience soil slumps, rapid debris flows, and deep-seated rotational slides. Slope stability can depend on a number of complex variables, including geology, slope structure, and amount of groundwater, and external processes such as climate, topography, slope geometry, and human activity. The factors that contribute to slope movements include those that decrease the resistance in the slope materials and those that increase stresses on the slope. Slope failure can occur on slopes of 15% or less, but the probability is greater on steeper slopes that exhibit old landslide features such as scarps, slanted vegetation, and transverse ridges.

¹ The PGA for a given component of motion is the largest value of horizontal acceleration obtained from a seismograph. PGA is expressed as the percentage of the acceleration due to gravity, which is approximately 980 centimeters per second squared.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Due to the flat or nearly flat topography along the footprint of the project site, landslides are not expected to be a significant hazard. The steepest part of the proposed project alignment occurs in the vicinity of Pole 19/47, where access would be required for a pulling/tensioning site and slopes are up to 10% (Google Earth 2016).

Volcanism

Mount Shasta, located approximately 10 miles northeast of the proposed Lassen Substation, is considered a dormant volcano that will erupt again. On average, the volcano has erupted once per 600 years during the last 4,500 years (City of Mount Shasta 2005). Based on radiocarbon dating, the last eruption occurred approximately 200 years ago (Miller 1980 as cited in PacifiCorp 2015). It is impossible to predict the date of next eruption, but if history is any indication, it could possibly occur in the next several hundred years. If Mount Shasta were to erupt, lava flows, pyroclastic flows, and mud flows could adversely affect the project site, possibly to include destruction of the Lassen Substation.

Subsidence

There are no known significant subsidence hazards in the project area (City of Mount Shasta 2005). Geologic or hydrologic conditions associated with subsidence are not known to occur in the area. However, some localized subsidence could result from peat oxidation in wetlands (City of Mount Shasta 2005).

5.6.2 Regulatory Setting

Federal

There are no federal regulations regarding geology and soils that directly apply to the proposed project.

State

Alquist–Priolo Earthquake Fault Zoning Act

The Alquist–Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. In accordance with this act, the state geologist established regulatory zones, called “earthquake fault zones,” around the surface traces of active faults, and publishes maps showing these zones. Earthquake fault zones are designated by the California Geological Survey and are delineated along traces of faults where mapping demonstrates surface fault rupture has occurred within the past 11,000 years. Construction within

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

these zones cannot be permitted until a geologic investigation has been conducted to prove that a building planned for human occupancy will not be constructed across an active fault. These types of site evaluations address the precise location and recency of rupture along traces of the faults, and are typically based on observations made in trenches excavated across fault traces.

The project site is not within an Alquist–Priolo Earthquake Fault Zone and does not involve a structure for human occupancy; therefore, it is not subject to the requirements of this act.

California Public Utilities Commission General Order 95

The applicant is required to comply with California Public Utilities Commission (CPUC) General Order 95, which institutes requirements for overhead line design, construction, and maintenance (CPUC 2012). Section IV of the order covers mechanical strength requirements for each class of line, either alone or involved in crossings, conflicts, or joint use of poles. The order specifies safety factors for communication and supply line construction that are the minimum allowable ratios of strengths of materials to the maximum working stresses. General Order 95 specifies that any entity planning to add facilities that would increase vertical, transverse, or longitudinal loading on a structure must perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors to below the values specified. The order also specifies strength requirements for construction materials, and minimum wood pole setting depths for various site conditions.

Industry Building Code and Standards

In addition to the requirements of CPUC General Order 95, foundations and structures for electrical substations and transmission facilities must be constructed in accordance with applicable industry building codes and standards. For example, PacifiCorp standards require substations to be designed and equipped according to qualification requirements described in the Institute of Electrical and Electronics Engineers (IEEE) Standard 693-2005, Recommended Practice for Seismic Design of Substations (PacifiCorp 2015). IEEE Standard 693-2005 exists to ensure that substations do not experience damage or loss of function during and after seismic events. Other applicable IEEE standards include IEEE 691-2001 (Transmission Structure Foundation Design and Testing) and IEEE 977-2010 (Guide to Installation of Foundations for Transmission Line Structures).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Local

Siskiyou County General Plan

The Seismic Safety and Safety Element of the Siskiyou County General Plan provides general background information on faulting and seismic risks in the region, but does not provide any goals or policies applicable to the location or construction of transmission line facilities (County of Siskiyou 1975).

City of Mount Shasta General Plan

The main goal of the Safety Element of the City of Mount Shasta General Plan is to ensure that life and property are adequately protected from seismic hazards. The implementation policies in the General Plan pertain to allowable building densities and development on steep slopes; there are no policies pertinent to the location or construction of transmission line facilities (City of Mount Shasta 2005).

5.6.3 Applicant Proposed Measures

The proposed project would integrate the following applicant proposed measure (APM) into the design and implementation of the project:

APM-GEO-1 The project will be designed and constructed in accordance with recommendations included in the project-specific geotechnical investigation: site grading, excavation and utility trenches, foundations, mitigation of soil corrosivity on concrete, seismic design criteria, and unpaved site access road.

5.6.4 Environmental Impacts and Mitigation

a) *Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

- i) *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. As discussed in Section 5.6.1, Environmental Setting, the proposed project is not located within an Alquist–Priolo Earthquake Fault Zone or crossed by any other known earthquake fault (PacifiCorp 2015). Therefore, the risk of earthquake fault rupture at the proposed substations or

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

anywhere along the alignment is negligible. Impacts with respect to this criterion would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

ii) *Strong seismic ground shaking?*

Less Than Significant Impact. The proposed project would not increase existing levels of public exposure to fault rupture, seismic ground shaking, or seismic-related ground failure such as liquefaction because it does not propose structures for human occupancy; because the existing substation would be rebuilt to modern design and construction standards; and because the transmission and distribution components would be collocated with existing infrastructure.

The potential effects of seismic ground shaking would be limited to the proposed project components, which, if improperly designed or constructed, could suffer damage. However, the proposed substation would be designed in accordance with the recommendations provided in the Preliminary Geotechnical Engineering Report prepared by PSI (2011). The preliminary report includes design and construction specifications and recommendations related to site preparation and earthwork, excavations and engineered fills, drainage and erosion control, foundations, and seismic design parameters. Furthermore, the proposed project must comply with strength requirements and safety factors for overhead line design, construction, and maintenance found in CPUC General Order 95, and would be designed and constructed in accordance with appropriate IEEE, American Society for Civil Engineers, and American Concrete Institute standards. Among other requirements, CPUC General Order 95 requires that lines or parts thereof be replaced or reinforced when safety factors have been reduced below certain specified minimums. Therefore, the proposed project would either maintain or (more likely) increase the stability of the overhead utility system compared to existing conditions. In accordance with APM-GEO-1, follow-up investigations would be completed, as warranted, to further refine the recommendations found in the Preliminary Geotechnical Engineering Report, and would be implemented in the construction of substation, transmission, and distribution line components. Underground components of the proposed project, if damaged, would not expose people or aboveground structures to additional geologic or seismic risks.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Although the proposed project could be subject to seismic ground shaking, it would not appreciably increase public exposure to such risks, and would be designed and constructed in accordance with applicable industry standards, geotechnical recommendations, and APM-GEO-1. In the unlikely event that an earthquake produces significant ground motions in the Mount Shasta area, PacifiCorp would send crews to inspect the lines and repair any damage detected in accordance with standard practice and procedures. For these reasons, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. As discussed in Section 5.6.1, Environmental Setting, soils in the project area could be susceptible to liquefaction, should ground shaking be sufficient in magnitude to trigger the effect. Furthermore, PSI judged the potential for lateral spread at the site to be high (PSI 2011). Given the low probability of major ground shaking, liquefaction and lateral spreading impacts in the project area are unlikely, even if the character of underlying soils and the high groundwater make them susceptible to such effects. Project design would include excavation of soft, loose, wet soils and replacement with imported structural fill materials, such as well-graded sand and gravel materials that meet the geotechnical grading specifications provided by PSI (2011). Replacement of native soils with compacted, well-graded sand and gravel materials would avoid and/or substantially reduce the liquefaction potential of the project site. In accordance with APM-GEO-1, additional investigation and testing would be conducted to further define the liquefaction and lateral spread potential of site soils.

The analysis in the preceding criterion is equally applicable to earthquake-induced liquefaction. Because the project would be designed and constructed in accordance with applicable industry standards, geotechnical recommendations, and APM-GEO-1, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

iv) Landslides?

Less Than Significant Impact. The project site is located on slopes of generally less than 5%. Localized areas along the alignment have slopes greater than 10%, but no access road construction or pole replacement would occur in these areas. Project-induced effects on landslide potential would generally be limited to access road construction or maintenance (i.e., removal of soils that buttress or add stability to a hillside) in areas where slopes exceed 30%. Therefore, the risk of landslide (rain and earthquake induced) at the proposed substation or anywhere along the alignment is negligible. In the unlikely event of a volcanic eruption on Mount Shasta, portions of the project site could be affected by mudflow runout. However, the likelihood of this occurring is very low. For the reasons above, impacts with respect to this criterion would be **less than significant**.

Significance After Mitigation: No mitigation is necessary because impacts would be **less than significant**.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Some soil erosion occurs naturally in the environment. In addition, the preliminary stage of construction, especially initial site grubbing, grading, and soil stockpiling, leaves loose soil exposed to the erosive forces of rainfall and high winds. Generally, excessive soil erosion can cause sedimentation problems in storm drain systems; rapid stormwater runoff can initiate or increase the size of shallow channels and/or gullies and potentially undermine engineered soils beneath foundations and paved surfaces. As indicated in Table 5.6-1, nearly all (88%) of the soils that underlie the project site are rated as having a slight erosion hazard, primarily due to the low slopes present within the project site. The remainder of the project site is underlain with soils rated as having a moderate erosion hazard.

The project is not expected to cause significant issues related to soil erosion for the reasons described in Section 5.9, Hydrology and Water Quality. In addition to the project site being generally located on level ground, the project would result in minimal changes with respect to stormwater flows, runoff, and erosion because a stormwater pollution prevention plan would be implemented during project construction to control potential erosion of temporarily disturbed areas. A stormwater pollution prevention plan is required because project construction would disturb more than 1 acre of land. APM-WQ-1 through APM-WQ-3 (see Section 5.9) are measures to avoid excessive land disturbance, to ensure that temporarily disturbed areas are restored to pre-construction conditions and stabilized, and to implement erosion control best management practices

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

(BMPs), including perimeter controls (e.g., straw wattles, hay bales, or silt fences), containment measures (e.g., covering stockpiles), and other BMPs to ensure that erosion and loss of topsoil are minimized.

Due to the limited nature of ground disturbance and the implementation of standard erosion BMPs during construction, the proposed project would not result in substantial soil erosion or loss of topsoil. No additional impacts would occur during operations and maintenance. Therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is necessary because impacts would be **less than significant**.

- c) ***Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

Less Than Significant Impact. As discussed in Section 5.6.4(a), the proposed project would not change the likelihood, magnitude, or extent of existing geologic hazards to people or structures. Project components would be constructed in accordance with the CPUC General Order 95, and utility companies would continue to respond to earthquakes and other emergencies using established standard operating procedures. There is a small chance that a large volcanic eruption on Mount Shasta could cover the project vicinity with a thick blanket of ash, or, in an extreme case, subject the region to lava or pyroclastic flows. However, the project would not affect the likelihood or severity of such impacts, nor would it increase public exposure risks. For these reasons, the impact of the proposed project on the exposure of people or structures to unstable soil units would be **less than significant**.

Significance After Mitigation: No mitigation is necessary because impacts would be **less than significant**.

- d) ***Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?***

Less Than Significant Impact. Expansive soils contain significant amounts of clay particles that have the ability to give up water (shrink) or take on water (swell). They are generally found in areas that were historically a floodplain or lake area, but they can also occur in hillside areas. When these soils swell, the change in volume can exert significant pressure on loads that are upon them, such as buildings or underground utilities, and can result in structural distress and/or damage. If dried out, the soil will contract, often

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

leaving fissures or cracks. Excessive drying and wetting of the soil can progressively deteriorate structures by leading to differential settlement beneath buildings and other structures. Table 5.6-1 provides an estimate of the shrink/swell potential of soils within the project site, which generally ranges from none to moderate. Expansive soils, if present along transmission and distribution line routes, are unlikely to pose a substantial geotechnical problem because poles would be buried using augured holes. Expansive soils are more typically a problem for underground linear appurtenances or flat, rigid foundations where greater surface areas are in contact with expansive soils.

Therefore, expansive soils concerns are limited to the substation and underground components of the project. However, such concerns are geotechnical concerns only and would not create substantial risks to life and property, since no habitable structures are proposed. In accordance with APM-GEO-1, and per the recommendations of the preliminary geotechnical report by PSI (2011), underground components and foundations would be founded on or backfilled with engineered fills of suitable quality (i.e., non-expansive, and sufficiently compacted, in accordance with standard industry practice). Any of the replacement poles or underground project components that show signs of being affected by expansive soils (e.g., leaning poles, cracked concrete) would be identified and repaired as needed during periodic inspection and maintenance of project components. In no case would the effects of expansive soil create a substantial risk to life and property. Therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is necessary because impacts would be **less than significant**.

- e) ***Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

No Impact. The project would not require use of septic tanks; therefore, this significance criterion is not applicable. The substation site would not be staffed, and would only be visited monthly or as needed for occasional maintenance and/or repair work. When necessary to support on-site maintenance or repairs, PacifiCorp would install portable toilets serviced by an outside contractor. There would be no septic tank or other wastewater disposal system on site; therefore, the project would have **no impact** with respect to soil suitability for such uses.

Significance After Mitigation: No mitigation is necessary because **no impact** would occur as a result of the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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5.7 Greenhouse Gas Emissions

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| GREENHOUSE GAS EMISSIONS – Would the project: | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.7.1 Environmental Setting

The Greenhouse Effect

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns, lasting for an extended period of time (decades or longer). A greenhouse gas (GHG) is any gas that absorbs infrared radiation in the atmosphere; in other words, GHGs trap heat in the atmosphere. The greenhouse effect is the trapping and build-up of heat in the atmosphere (troposphere) near the Earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: Short-wave radiation emitted by the Sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward the Earth. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature. Without it, the temperature of the Earth would be about 0°F (−18°C) instead of its present 57°F (14°C). If the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere will gradually increase. Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect.

Greenhouse Gases

GHGs include, but are not limited to, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), water vapor (H₂O), hydrofluorocarbons (HFCs), hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Some GHGs, such as CO₂, CH₄, and N₂O, occur naturally and are emitted to the atmosphere through natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO₂, include fluorinated gases, such

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

as HFCs, HCFCs, PFCs, and SF₆, which are associated with certain industrial products and processes. A summary of the most common GHGs and their sources is included in the following text.¹

Carbon Dioxide. CO₂ is a naturally occurring gas and a by-product of human activities and is the principal anthropogenic GHG that affects the Earth's radiative balance. Natural sources of CO₂ include respiration of bacteria, plants, animals, and fungus; evaporation from oceans; volcanic outgassing; and decomposition of dead organic matter. Human activities that generate CO₂ include the combustion of coal, oil, natural gas, and wood.

Methane. CH₄ is a flammable gas and is the main component of natural gas. Methane is produced through anaerobic (without oxygen) decomposition of waste in landfills, flooded rice fields, animal digestion, decomposition of animal wastes, production and distribution of natural gas and petroleum, coal production, and incomplete fossil fuel combustion.

Nitrous Oxide. Sources of N₂O include soil cultivation practices (microbial processes in soil and water), especially the use of commercial and organic fertilizers, manure management, industrial processes (such as in nitric acid production, nylon production, and fossil-fuel-fired power plants), vehicle emissions, and the use of N₂O as a propellant (such as in rockets, racecars, aerosol sprays).

Fluorinated Gases. Fluorinated gases are synthetic, powerful GHGs that are emitted from a variety of industrial processes. Prevalent fluorinated gases include the following:

- **Hydrofluorocarbons:** HFCs are compounds containing only hydrogen, fluorine, and carbon atoms. HFCs are synthetic chemicals that are used as alternatives to O₃-depleting substances in serving many industrial, commercial, and personal needs. HFCs are emitted as byproducts of industrial processes and are used in manufacturing.
- **Hydrochlorofluorocarbons:** HCFCs are compounds containing hydrogen, fluorine, chlorine, and carbon atoms. HCFCs are synthetic chemicals that are used as alternatives to O₃ depleting substances (chlorofluorocarbons).
- **Perfluorocarbons:** PFCs are a group of human-made chemicals composed of carbon and fluorine only. These chemicals were introduced as alternatives, along with HFCs, to O₃ depleting substances. The two main sources of PFCs are aluminum production and semiconductor manufacturing. Since PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere, these chemicals have long lifetimes, ranging between 10,000 and 50,000 years.

¹ The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change's Second Assessment Report and Fourth Assessment Report (IPCC 1995, 2007), the California Air Resources Board's Glossary of Terms Used in GHG Inventories (CARB 2015), and the U.S. Environmental Protection Agency's Glossary of Climate Change Terms (EPA 2016a).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- **Sulfur Hexafluoride:** SF₆ is a colorless gas that is soluble in alcohol and ether and slightly soluble in water. SF₆ is used for insulation in electric power transmission and distribution equipment, semiconductor manufacturing, the magnesium industry, and as a tracer gas for leak detection.

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 Intergovernmental Panel on Climate Change's Synthesis Report (IPCC 2014) indicated that warming of the climate system is unequivocal, and many of the changes observed since the 1950s are unprecedented. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels (IPCC 2014).

In California, climate change impacts have the potential to affect sea-level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, and electricity demand and supply (CCCC 2006). The primary effect of global climate change has been a 0.2°C rise in average global tropospheric temperature per decade, determined from meteorological measurements worldwide between 1990 and 2005. Scientific modeling predicts that continued emissions of GHGs at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. A warming of about 0.2°C (0.36°F) per decade is projected, and there are identifiable signs that global warming could be taking place.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. The average temperatures in California have increased, leading to more extreme hot days and fewer cold nights. Shifts in the water cycle have been observed, with less winter precipitation falling as snow, and both snowmelt and rainwater running off earlier in the year. Sea levels have risen, and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (CAT 2010a).

An increase in annual average temperature is a reasonably foreseeable effect of climate change. Observed changes over the last several decades across the western United States reveal clear signals of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada region (CCCC 2012). By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1°F to 8.6°F, depending on emissions levels. Springtime warming—a critical influence on snowmelt—will be particularly pronounced. Summer temperatures will rise more

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

than winter temperatures, and the increases will be greater in inland California, compared to the coast. Heat waves will be more frequent, hotter, and longer. There will be fewer extremely cold nights (CCCC 2012). A decline of Sierra Nevada snowpack, which accounts for approximately half of the surface water storage in California, by 30% to as much as 90% is predicted over the next 100 years (CAT 2010a).

Model projections for precipitation over California continue to show the Mediterranean pattern of wet winters and dry summers with seasonal, year-to-year, and decade-to-decade variability. For the first time, however, several of the improved climate models shift toward drier conditions by the mid-to-late 21st century in central, and most notably, Southern California. By the late century, all projections show drying, and half of them suggest 30-year average precipitation will decline by more than 10% below the historical average (CCCC 2012).

Wildfire risk in California will increase as a result of climate change. Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning. However, human activities will continue to be the biggest factor in ignition risk. It is estimated that the long-term increase in fire occurrence associated with a higher emissions scenario is substantial, with increases in the number of large fires statewide ranging from 58% to 128% above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57% to 169%, depending on the location (CCCC 2012).

Reduction in the suitability of agricultural lands for traditional crop types may occur. While effects may occur, adaptation could allow farmers and ranchers to minimize potential negative effects on agricultural outcomes by adjusting timing of plantings or harvesting and changing crop types.

Public health-related effects of increased temperatures and prolonged temperature extremes, including heat stroke, heat exhaustion, and exacerbation of existing medical conditions, could be particular problems for the elderly, infants, and those who lack access to air conditioning or cooled spaces (CNRA 2009).

Contributions to GHG Emissions

United States

Per the U.S. Environmental Protection Agency's (EPA's) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2014 (2016b), total U.S. GHG emissions were approximately 6,870.5 million metric tons (MMT) carbon dioxide equivalent (CO₂E) in 2014. The primary

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

GHG emitted by human activities in the United States was CO₂, which represented approximately 80.9% of total GHG emissions (5,556.0 MMT CO₂E). The largest source of CO₂, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 93.7% of CO₂ emissions in 2014 (5,208.2 MMT CO₂E). Total U.S. GHG emissions have increased by 7.4% from 1990 to 2014, and emissions increased from 2013 to 2014 by 1.0% (70.5 MMT CO₂E). Since 1990, U.S. GHG emissions have increased at an average annual rate of 0.3%; however, overall, net emissions in 2014 were 8.6% below 2005 levels (EPA 2016b).

State of California

According to California's 2000–2014 GHG emissions inventory (2016 edition), California emitted 441.5 MMT CO₂E in 2014, including emissions resulting from out-of-state electrical generation (CARB 2016). The sources of GHG emissions in California include transportation, industry, electric power production from both in-state and out-of-state sources, residential and commercial activities, agriculture, high global-warming potential substances, and recycling and waste. The California GHG emission source categories and their relative contributions in 2014 are presented in Table 5.7-1.

Table 5.7-1
GHG Sources in California

| Source Category | Annual GHG Emissions (MMT CO ₂ E) | Percent of Total ^a |
|--|--|-------------------------------|
| Transportation | 159.53 | 36% |
| Industrial uses | 93.32 | 21% |
| Electricity generation ^b | 88.24 | 20% |
| Residential and commercial uses | 38.34 | 9% |
| Agriculture | 36.11 | 8% |
| High global-warming potential substances | 17.15 | 4% |
| Recycling and waste | 8.85 | 2% |
| Total | 441.54 | 100% |

Source: CARB 2016.

Notes: Emissions reflect the 2014 California GHG inventory. MMT CO₂E = million metric tons of carbon dioxide equivalent per year

^a Percentage of total has been rounded, and total may not sum due to rounding.

^b Includes emissions associated with imported electricity, which account for 36.51 MMT CO₂E annually.

During the 2000 to 2014 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 13.9 metric tons (MT) per person to 11.4 MT per person in 2014, representing an 18% decrease. In addition, total GHG emissions in 2014 were 2.8 MMT CO₂E less than 2013 emissions. The declining trend in GHG emissions, coupled with programs that will continue to provide additional GHG reductions going forward, demonstrates that California is on track to meet the 2020 target of 431 MMT CO₂E (CARB 2016).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.7.2 Regulatory Setting

Federal

In addition to regulations governing criteria pollutants, both the EPA and the State of California have adopted regulations governing emissions of GHG. On April 17, 2009, the EPA issued its proposed endangerment finding for GHG emissions. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHG under Section 202(a) of the Clean Air Act, as described in the following paragraphs.

Massachusetts vs. EPA

On April 2, 2007, in *Massachusetts v. EPA*, the Supreme Court directed the EPA Administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the EPA Administrator is required to follow the language of Section 202(a) of the federal Clean Air Act. On December 7, 2009, the Administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act:

- The Administrator found that elevated concentrations of GHGs—CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the “endangerment finding.”
- The Administrator further found the combined emissions of GHGs—CO₂, CH₄, N₂O, and HFCs—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the “cause or contribute finding.”

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the Clean Air Act.

Energy Independence and Security Act

On December 19, 2007, President George W. Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the act would do the following, which would aid in the reduction of national GHG emissions:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

2. Set a target of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
3. Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

EPA and NHTSA Joint Final Rule for Vehicle Standards

The EPA, in conjunction with the NHTSA, has adopted regulations to reduce GHG emissions and increase the Corporate Average Fuel Economy (CAFE) standards for new passenger cars and light-duty trucks (EPA and NHTSA 2010). Under the first round of regulations promulgated in 2010, new passenger cars, light-duty trucks, and medium-duty passenger vehicles must meet an estimated combined average emissions level of 250 grams of CO₂ per mile in model year 2016, equivalent to 35.5 mpg if the automotive industry were to meet this CO₂ level through fuel economy improvements alone. The CAFE standards for passenger cars and light trucks will be phased in between 2012 and 2016, with the final standards equivalent to 37.8 mpg for passenger cars and 28.8 mpg for light-duty trucks, resulting in an estimated combined average of 34.1 mpg.

In 2011, the EPA and NHTSA approved the first-ever program to reduce GHG emissions and increase fuel efficiency for medium- and heavy-duty vehicles (EPA and NHTSA 2011). Effective November 14, 2011, the CO₂ emissions and fuel efficiency standards of this regulation apply to model year 2014–2018 combination tractors (i.e., semi-trucks), heavy-duty pickup trucks and vans, and vocational vehicles including transit and school buses. This regulation covers vehicles with a gross vehicle weight rating of 8,500 pounds or greater; medium-duty passenger vehicles are covered by the previous regulation for passenger cars and light-duty trucks. In addition, the EPA has adopted standards to control HFC leakage from air-conditioning systems in combination tractors and heavy-duty pickup trucks and vans as well as CH₄ and N₂O standards for heavy-duty engines, pickup trucks, and vans. In August 2012, the EPA and NHTSA approved a second round of GHG and CAFE standards for model years 2017 and beyond (EPA and NHTSA 2012). These standards will reduce motor vehicle GHG emissions to 163 grams of CO₂ per mile, which is equivalent to 54.5 mpg if this level were achieved solely through improvements in fuel efficiency, for cars and light-duty trucks by model year 2025. A portion of these improvements, however, will likely be made through improvements in air-conditioning leakage control and through use of alternative refrigerants, which would not contribute to fuel economy. The first phase of the CAFE standards, for model year 2017–2021, is

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

projected to require, on an average industry-fleet-wide basis, a range from 40.3 to 41.0 mpg in model year 2021. The second phase of the CAFE program, for model years 2022–2025, includes standards (which are not final due to the statutory requirement that NHTSA set average fuel economy standards not more than five model years at a time) projected to require, on an average industry-fleet-wide basis, a range from 48.7 to 49.7 mpg in model year 2025. The regulations also include targeted incentives to encourage early adoption and introduction into the marketplace of advanced technologies to dramatically improve vehicle performance, including the following:

- Incentives for electric vehicles, plug-in hybrid electric vehicles, and fuel cell vehicles
- Incentives for hybrid technologies for large pickups and for other technologies that achieve high fuel economy levels on large pickups
- Incentives for natural gas vehicles
- Credits for technologies with potential to achieve real-world GHG reductions and fuel economy improvements that are not captured by the standard test procedures

State

Assembly Bill 1493

In a response to the transportation sector accounting for more than half of California's CO₂ emissions, Assembly Bill (AB) 1493 (Pavley) was enacted on July 22, 2002. AB 1493 required the California Air Resources Board (CARB) to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the state. The bill required that CARB set GHG emission standards for motor vehicles manufactured in 2009 and all subsequent model years. CARB adopted the standards in September 2004. When fully phased in, the near-term (2009–2012) standards will result in a reduction of about 22% in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term (2013–2016) standards will result in a reduction of about 30%.

Before these regulations could go into effect, the EPA had to grant California a waiver under the federal Clean Air Act, which ordinarily preempts state regulation of motor vehicle emission standards. The waiver was granted by Lisa Jackson, the EPA Administrator, on June 30, 2009. On March 29, 2010, the CARB Executive Officer approved revisions to the motor vehicle GHG standards to harmonize the state program with the national program for 2012–2016 model years (see “EPA and NHTSA Joint Final Rule for Vehicle Standards,” discussed earlier). The revised regulations became effective on April 1, 2010.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Executive Order S-3-05

In June 2005, Governor Schwarzenegger established California's GHG emissions reduction targets in Executive Order S-3-05. The executive order established the following goals: GHG emissions should be reduced to 2000 levels by 2010; GHG emissions should be reduced to 1990 levels by 2020; and GHG emissions should be reduced to 80% below 1990 levels by 2050. The California Environmental Protection Agency secretary is required to coordinate efforts of various agencies to collectively and efficiently reduce GHGs. The Climate Action Team (CAT) is responsible for implementing global warming emissions reduction programs. Representatives from several state agencies compose the CAT. Under the executive order, the California Environmental Protection Agency secretary is directed to report every 2 years on progress made toward meeting the GHG targets and the impacts to California due to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. The CAT fulfilled its initial report requirements through the 2006 Climate Action Team Report to Governor Schwarzenegger and the Legislature (CAT 2006).

The 2009 Climate Action Team Biennial Report (CAT 2010a), published in April 2010, expands on the policy outlined in the 2006 assessment. The 2009 report provides new information and scientific findings regarding the development of new climate and sea level projections using new information and tools that have recently become available and evaluates climate change within the context of broader social changes, such as land use changes and demographics. The 2009 report also identifies the need for additional research in several different aspects that affect climate change in order to support effective climate change strategies. The aspects of climate change determined to require future research include vehicle and fuel technologies, land use and smart growth, electricity and natural gas, energy efficiency, renewable energy and reduced carbon energy sources, low GHG technologies for other sectors, carbon sequestration, terrestrial sequestration, geologic sequestration, economic impacts and considerations, social science, and environmental justice.

Subsequently, the 2010 Climate Action Team Report to Governor Schwarzenegger and the California Legislature (CAT 2010b) reviewed past climate action milestones, including voluntary reporting programs, GHG standards for passenger vehicles, the Low Carbon Fuel Standard, a statewide renewable energy standard, and the cap-and-trade program. Additionally, the 2010 report includes a cataloging of recent research and ongoing projects; mitigation and adaptation strategies identified by sector (e.g., agriculture, biodiversity, electricity, and natural gas); actions that can be taken at the regional, national, and international levels to mitigate the adverse effects of climate change; and today's outlook on future conditions. The 2010 report also focuses on case studies involving collaborative efforts among multiple agencies on research projects related to climate change and policy development.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Assembly Bill 32

In furtherance of the goals established in Executive Order S-3-05, the legislature enacted AB 32 (Núñez and Pavley), the California Global Warming Solutions Act of 2006, which Governor Schwarzenegger signed on September 27, 2006. The GHG emissions limit is equivalent to the 1990 levels, which are to be achieved by 2020.

CARB has been assigned to carry out and develop the programs and requirements necessary to achieve the goals of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions. This program will be used to monitor and enforce compliance with the established standards. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 allows CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

The first action under AB 32 resulted in the adoption of a report listing early action GHG emission reduction measures on June 21, 2007. The early actions include three specific GHG control rules. On October 25, 2007, CARB approved an additional six early action GHG reduction measures under AB 32. The three original early-action regulations meeting the narrow legal definition of “discrete early action GHG reduction measures” are as follows:

1. A low-carbon fuel standard to reduce the “carbon intensity” of California fuels
2. Reduction of refrigerant losses from motor vehicle air conditioning system maintenance to restrict the sale of “do-it-yourself” automotive refrigerants
3. Increased methane capture from landfills to require broader use of state-of-the-art methane capture technologies

The additional six early-action regulations, which were also considered “discrete early action GHG reduction measures,” consist of the following:

1. Reduction of aerodynamic drag, and thereby fuel consumption, from existing trucks and trailers through retrofit technology
2. Reduction of auxiliary engine emissions of docked ships by requiring port electrification
3. Reduction of PFCs from the semiconductor industry

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4. Reduction of propellants in consumer products (e.g., aerosols, tire inflators, and dust removal products)
5. Requirements that all tune-up, smog check, and oil change mechanics ensure proper tire inflation as part of overall service in order to maintain fuel efficiency
6. Restriction on the use of SF₆ from non-electricity sectors if viable alternatives are available

As required under AB 32, on December 6, 2007, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was set at 427 MMT CO₂E. In addition to the 1990 emissions inventory, CARB also adopted regulations requiring mandatory reporting of GHGs for large facilities that account for 94% of GHG emissions from industrial and commercial stationary sources in California. About 800 separate sources fall under the new reporting rules and include electricity generating facilities, electricity retail providers and power marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and other industrial sources that emit CO₂ in excess of specified thresholds.

On December 11, 2008, CARB approved the Climate Change Proposed Scoping Plan: A Framework for Change (Scoping Plan; CARB 2008) to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and CAT early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program.

The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards
- Achieving a statewide renewables energy mix of 33%
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation

Senate Bill X1 2

On April 12, 2011, Governor Brown signed Senate Bill (SB) X1 2 in the First Extraordinary Session, which would expand the Renewables Portfolio Standard by establishing a goal of 20% of the total electricity sold to retail customers in California per year, by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current and that meets other specified requirements with respect to its location. In addition to the retail sellers covered by SB 107, SB X1 2 adds local publicly owned electric utilities to the Renewables Portfolio Standard. By January 1, 2012, the California Public Utilities Commission is required to establish the quantity of electricity products from eligible renewable energy resources to be procured by retail sellers in order to achieve targets of 20% by December 31, 2013; 25% by December 31, 2016; and 33% by December 31, 2020. The statute also requires that the governing boards for local publicly owned electric utilities establish the same targets and assigns to the governing boards the responsibility for ensuring compliance with these targets. The California Public Utilities Commission will be responsible for enforcement of the Renewables Portfolio Standard for retail sellers, while the California Energy Commission and CARB will enforce the requirements for local publicly owned electric utilities.

Local

The Siskiyou County Air Pollution Control District has not established official thresholds of significance for GHG emissions; however, for the purposes of this analysis, a screening threshold of 900 MT CO₂E per year based on the approach outlined in the California Air Pollution Control Officers Association (CAPCOA) report CEQA & Climate Change (CAPCOA 2008) was used for the purpose of evaluating GHG emissions under CEQA. Using this approach, any project exceeding 900 MT CO₂E per year would have potentially significant impacts. Consistent with other jurisdictions currently using this threshold throughout the state,² emissions

² The South Coast Air Quality Management District recommends that construction emissions be amortized over a 30-year period. The County of San Diego within the San Diego Air Pollution Control District recommends amortization of construction emissions over a 20-year period. The City of San Diego recommends a 30-year amortization rate. The San Luis Obispo County Air Pollution Control District (SLOCAPCD) recommends a 50-year amortization period for residential projects and 25-year year amortization period for commercial (non-residential projects) based on the anticipated project life.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

associated with both construction and operation are to be disclosed, and construction emissions are amortized over the “project life” (ranging between 20 years and 50 years) and then included with the operational emissions. To be conservative, construction emissions are amortized over a 20-year period.

5.7.3 Applicant Proposed Measures

The following applicant proposed measure (APM) will be incorporated into the project design to minimize GHG emissions during project construction:

APM-AQ-1 Construction Pollutant Reduction Measures:

Particulate matter emissions shall be controlled by implementing standard construction dust control measures including, but not limited to, the following:

- Minimize soil disturbance.
- Regularly water disturbed areas, including on-site vehicle/equipment travel routes and soil stockpiles. Watering should be sufficient to prevent airborne dust from leaving the site.
- Curtail earthmoving activities on windy days.
- Ensure that the engines of all construction equipment are properly tuned.
- Limit the maximum speed to 15 miles per hour on unpaved surfaces.
- Replant vegetation in disturbed areas as quickly as possible.
- Implement other effective particulate matter control measures, as needed.

Greenhouse gas emissions generated during project construction shall be minimized by implementing the following measures:

- Use California Air Resources Board-certified construction equipment, where available.
- Use alternative fuel types for construction equipment where feasible.
- Use local building materials.
- Limit construction vehicle idling time.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Other criteria pollutant emissions generated during project construction shall be minimized by implementing the following measures:

- Use California Air Resources Board-certified construction equipment, where available.
- Use alternative fuel types for construction equipment where feasible.
- Use local building materials.
- Limit construction vehicle idling time.

5.7.4 Environmental Impacts and Mitigation

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Construction Emissions

Less Than Significant Impact. Construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. The project would include construction of the new Lassen Substation, transmission line upgrades, distribution line upgrades and subterranean cable installation work, and demolition of the existing Mount Shasta Substation following energization of the proposed Lassen Substation. For the purposes of emissions estimates, it was assumed that construction activities would commence in October 2016 and be completed in November 2017, requiring approximately 41 weeks of total construction time. Section 4.6, Construction Activities, of the Project Description provides details regarding the anticipated construction scenario, including equipment fleet, and Section 4.7 identifies the construction schedule, both of which were used to estimate annual GHG emissions.

The California Emissions Estimator Model (CalEEMod) Version 2013.2.2 was used to estimate emissions generated during construction based on the construction scenario described in Chapter 4, Project Description.

Table 5.7-2 presents total construction emissions for the project in 2016 and 2017 from on-site and off-site emission sources.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.7-2
Estimated Construction GHG Emissions

| CO ₂ | CH ₄ | N ₂ O | CO ₂ E |
|---|-----------------|------------------|-------------------|
| <i>Metric Tons per Year</i> | | | |
| 1,862 | 0.46 | 0.00 | 1,872 |
| Amortized Construction Emissions | | | 94 |

Source: PacifiCorp 2015.

Notes: GHG = greenhouse gas; CO₂ = carbon dioxide; CH₄ = methane; N₂O = nitrous oxide; CO₂E = carbon dioxide equivalent.

As shown in Table 5.7-2, the estimated total yearly GHG emissions would be approximately 1,872 MT CO₂E over the construction period. Construction emissions amortized over a 20-year project life would be approximately 94 MT CO₂E per year.

GHG emissions generated during construction of the project would be short term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Because there is no separate GHG threshold for construction, the evaluation of significance is provided in the operational emissions analysis in the following discussion.

Operational Emissions

Less Than Significant Impact. Operational activities would be similar to present activities: maintenance and repair crews would visit on monthly or as-needed basis. Transmission line inspection would occur on an annual or half-yearly basis, or as needed should repair issues or outages arise, as described in Section 4.8, Operation and Maintenance. As such, emissions associated with maintenance activities would be minimal and would not result in a net increase above existing conditions. Additionally, it can be reasonably assumed that operation and maintenance vehicles will be more fuel-efficient, would include improved technology, and would conform to requirements implemented by CARB that include lower-emitting vehicles than those currently used for the existing facility.

Regarding breaker technology, as described in Section 4.2, Project Objectives, one of the primary objectives of the project would be replacement of “aging and non-standard equipment, and the removal of SF₆ distribution breakers.” SF₆ is a highly reactive GHG that is subject to regulation as part of GHG emission reduction targets (17 CCR 95350 et seq.), and the applicant no longer uses SF₆ based breakers in their distribution systems. Therefore, the removal of the existing SF₆ based breakers would reduce any potential SF₆ leakage and associated GHG emissions during operation of the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

In summary, the project would only generate GHG emissions during short-term construction activities, which would be approximately 94 MT CO₂E per year when amortized over a conservative 20-year project life. Combined construction and operational emissions would be below the CAPCOA-based 900 MT CO₂E screening threshold, and no impacts associated with SF₆ related GHG emissions would occur. Therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. Neither the Siskiyou County Air Pollution Control District nor Siskiyou County have currently adopted a region-specific plan for reducing GHG emissions. The project would consist of replacing the existing Mount Shasta Substation with the new Lassen Substation, including associated improvements; therefore, the project would not include a population-inducing component that would substantially increase daily or annual vehicle trips, and implementation of the project would not introduce a new substantial source of GHG emissions that were not previously anticipated under current plans, including the Siskiyou County General Plan. As such, because the project would not be a source of substantial GHG emissions and the project would not conflict with existing land uses or result in growth-inducing uses, the project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions.

Additionally, for the purposes of this analysis, a screening threshold of 900 MT CO₂E per year based on the approach outlined in the CAPCOA report CEQA & Climate Change (CAPCOA 2008) was used for the purpose of evaluating GHG emissions under CEQA. Construction and operation of the proposed project would result in approximately 94 MT CO₂E per year when conservatively amortized over a 20-year project life, consistent with various agencies throughout the state. Therefore, emissions would not exceed the 900 MT CO₂E screening threshold. The proposed project would not conflict with or obstruct implementation of an applicable GHG reduction plan, and **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.8 Hazards and Hazardous Materials

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| HAZARDS AND HAZARDOUS MATERIALS – Would the project: | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5.8.1 Environmental Setting

This section provides setting information specific to hazards and hazardous materials in the project vicinity. It describes the environmental conditions within the proposed project site as they relate to the potential presence of hazardous materials (storage, use, transport, and/or release), aviation safety, emergency response, and fire hazards.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Hazardous Materials Definition

The term “hazardous materials” refers to both hazardous substances and hazardous wastes. Under federal and state laws, any material, including waste, may be considered hazardous if it is specifically listed by statute as such or if it is toxic (causes adverse human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), or reactive (causes explosions or generates toxic gases). The term “hazardous material” is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (California Health and Safety Code, Chapter 6.95, Section 25501(o)).

In some cases, past industrial or commercial activities on a site may have resulted in spills or leaks of hazardous materials to the ground, resulting in soil and/or groundwater contamination. Hazardous materials may also be present in building materials and released during building demolition activities. If improperly handled, hazardous materials and wastes can cause public health hazards when released to the soil, groundwater, or air. The four basic exposure pathways through which an individual can be exposed to a chemical agent include inhalation, ingestion, bodily contact, and injection. Exposure can come as a result of an accidental release during transportation, storage, or handling of hazardous materials. Disturbance of subsurface soil during construction can also lead to exposure of workers or the public from stockpiling, handling, or transportation of soils contaminated by hazardous materials from previous spills or leaks.

Potential Presence of Hazardous Materials in Soil and Groundwater

The proposed project would be located within an existing PacifiCorp utility easement, located partially within the rights-of-way of public roads and partially within open space and private land. Land uses surrounding the proposed project consist primarily of open space and rural residences; along with residential, commercial, and limited/light industrial land uses in the City of Mount Shasta (City).

Enplan (2015) conducted a Phase I environmental site assessment (ESA) on the proposed Lassen Substation site as well as the overhead and underground distribution line locations. This included review of three previous Phase I ESAs conducted on the on the proposed Lassen Substation site—two in 2011 and one in 2014. These previous Phase I ESAs were limited to the proposed Lassen Substation site, consisting of 504 and 506 Old Stage Road, or Assessor’s Parcel Numbers 036-220-170 and 036-220-280. The 2015 Phase I ESA completed by Enplan (2015) includes a review and summary of those previous Phase I ESAs, along with an updated assessment to include the transmission and distribution line components of the proposed project. Phase I ESAs

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

are conducted in conformance with guidelines presented in American Society for Testing Materials (ASTM) Standard E 1527-13, Standard Practice for Environmental Site Assessments. Information used to conduct the assessment includes but is not limited to on-site reconnaissance, owner/operator/representative interviews, correspondence with the local environmental health department(s), review of historical imagery and topographic maps, and extensive regulatory agency database searches.

Ultimately, the assessment concluded that there is no obvious evidence of recognized environmental conditions¹ (RECs), historical RECs, or controlled RECs in connection with the Lassen Substation site, transmission line, or distribution line (Enplan 2015; PacifiCorp 2016). The regulatory agency database review—which consisted of 106 federal, state, local, tribal, and proprietary records databases—found no evidence the proposed project is on an identified hazardous materials use, storage, disposal, or release site (Enplan 2015; PacifiCorp 2016). Sixteen sites revealed in the record search were found to be in close proximity to (but not on or overlapping with) the proposed project site. None of the sites were determined to represent a REC based on (1) the absence of an identified spill or release of hazardous materials (i.e., present in regulatory databases for their use/storage/transport of hazardous materials only), (2) the case having received regulatory agency closure, and/or (3) the minimal volume and/or controlled nature of the spill or release (Enplan 2015; PacifiCorp 2016).

Beyond the immediate vicinity of the proposed project site, 111 additional hazardous materials use, storage, disposal, or release sites were identified within the ASTM minimum search radius (Enplan 2015; PacifiCorp 2016).² All but three either had no reported spill or release, or had received regulatory agency closure. Enplan reviewed the three “open” sites, listed as not having received regulatory closure, and upon further review of the State Water Resources Control Board (SWRCB) GeoTracker website found that none were listed as open cases. All three of these sites were between 0.25 and 0.5 miles away from the proposed project (Enplan 2015; PacifiCorp 2016).

In addition to the Phase I ESA conducted by Enplan in 2015, the GeoTracker database and the California Department of Toxic Substances Control (DTSC) EnviroStor database were reviewed to confirm regulatory database findings and to verify that no new cleanup sites in close proximity to the proposed project were added since the Phase I ESAs were conducted (SWRCB 1992, 1994; TRC 2016; Geocon 2016; SWRCB 2016). EnviroStor and GeoTracker are state databases

¹ “Recognized Environmental Condition” is defined in ASTM International E1527-13 as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.”

² Minimum search distances prescribed in the ASTM standard are based on the specific database being reviewed, and range from the subject property only to all lands within a 1-mile radius of the subject property.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

that track the status and compliance activities of sites undergoing cleanup or remediation under the jurisdiction of the DTSC and SWRCB, respectively. The SWRCB generally oversees site assessment and cleanup activities for land uses and activities with potential for adverse effects on the state's water quality and drinking water supplies (including groundwater), whereas the DTSC oversees cleanup cases that have resulted in soils contamination that may pose a threat to human health or the environment. These databases are presented as geographic web map viewers, and the location of cleanup sites are stored in a point database that can be queried using GIS. Based on this review, there are no new open cleanup cases in the vicinity of the proposed project site.

In addition, the largest cleanup site case in the City—which consists of an approximately 65-acre site between South Mount Shasta Boulevard to the east and the Union Pacific Railroad tracks to the west in the southern portion of the City—was reviewed to determine whether its impacts could extend beyond its boundaries into the proposed project footprint. The cleanup site was a historical mill and box factory, which had historically conducted activities resulting in the release of hydrocarbons, polychlorinated biphenyls (PCBs), and dioxins/furans associated with wood log treatments, a former refuse burner, aboveground storage tanks (ASTs)/underground storage tanks (USTs), and other factors. The site is referenced as the “The Landing,” with its northern portion referred to as the “Old Mill” and the southern portion the “New Mill” (TRC 2016; Geocon 2016). Review of the site investigation reports and cleanup work plans for this site indicates that impacts are primarily to surface soil, shallow soil, and surface water (TRC 2016; Geocon 2016). Given the media impacted and the distance of the site from the proposed project site (0.37 miles to the east of the southern end of the transmission line alignment), the site's issues are not expected to intersect with the proposed project.

Existing Substation and Transmission Facilities

No spills, leaks, or hazardous materials releases are known to have occurred within the existing PacifiCorp facilities, including the existing substation and the transmission alignment. However, the building materials themselves may have hazardous waste characteristics, and will require characterization so that the appropriate method of disposal (and/or reuse) can be determined in accordance with applicable federal and state regulations.

Wood Treatment Products

The project would remove up to 36 existing wooden poles. The wooden poles could be treated with chemicals such as pentachlorophenol, creosote, and chromated copper arsenate. Typically, these chemicals are applied to wooden utility poles during manufacturing to protect wood from rotting due to insects and microbial agents. These chemicals, for certain uses and quantities, can be considered to be hazardous materials, which require specific handling procedures and disposal

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

prescribed by federal and state regulations. Additionally, the base of some of the treated wooden poles may be wrapped with copper naphthenate paper, also known as CuNap wrap.³ This paper has been accepted as a wood preservative for several decades and has been employed in non-pressure treatments of wood and other products. Copper naphthenate is a common preservative and its use has increased recently in response to environmental concerns associated with other wood treatment products.

Existing Substation

The existing substation, in addition to containing the wood treatment products described above, has transformer banks with mineral oil and contains older structures and power equipment that could have lead-based paint (LBP), PCBs, and/or elevated levels of mercury or asbestos. The existing substation site has not been surveyed for the presence of hazardous materials such as asbestos, LBP, PCBs, and mercury (PacifiCorp 2016).

Proposed Substation Site

Previous ESA reports for the proposed Lassen Substation site indicate that the proposed Lassen Substation site consisted of undeveloped land from at least 1897 to 1959. A residence was built at 504 South Old Stage Road in 1960. A mobile home was placed on the northern portion of 506 South Old Stage Road by 1972. No evidence was encountered to indicate that the proposed Lassen Substation site was ever used for agricultural purposes such as row crops or orchards (Enplan 2015). A propane AST and a heating oil AST were observed in 2011; however, they were removed by 2014. Aside from a propane AST located at 504 South Old Stage Road and a residential heating oil AST located at 506 South Old Stage Road, no regulated quantities of hazardous materials, including 55-gallon drums of chemicals, ASTs, or USTs, were observed to be used, stored, or disposed of on the proposed Lassen Substation site (Enplan 2015).

Airports

There are no public use airports or private airstrips in the immediate vicinity of the project site (County of Siskiyou 2016a; PacifiCorp 2015). The nearest commercial service airports are located in the City of Medford, Oregon, and the City of Redding, California. The nearest public airport to the project alignment is the Dunsmuir Municipal–Mott Airport, which serves only light aircraft and is approximately 4 miles southeast of the proposed project site. Google Earth was searched for evidence of any private airstrips and none were located in the project vicinity (i.e., within a 5-mile radius).

³ CuNap wrap is a self-contained delivery system for copper naphthenate, an internationally recognized wood preservative that fights the damaging effects of moisture, decay, and insect attack.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

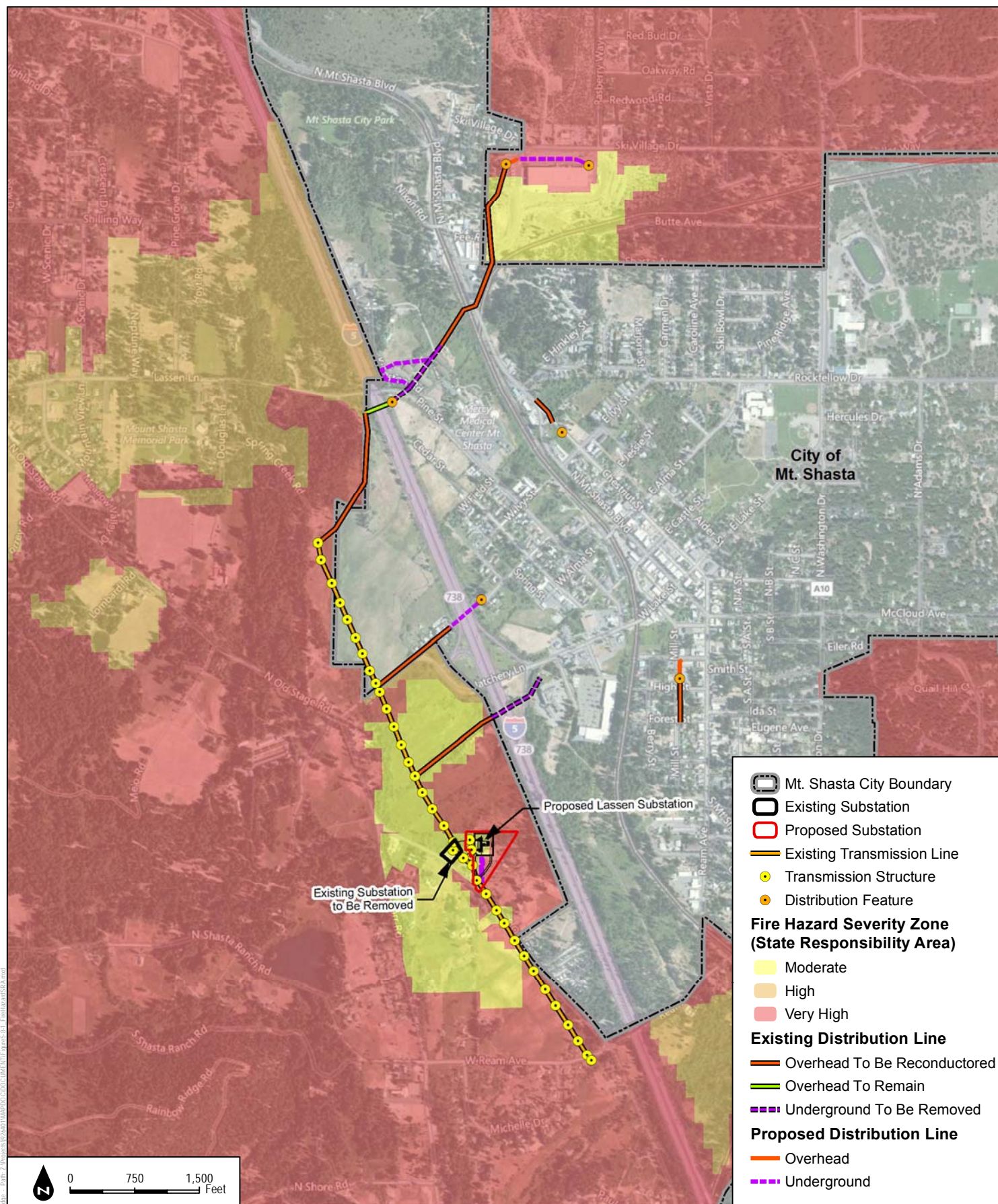
Emergency Response

Siskiyou County (County) has not adopted an emergency evacuation plan or response plan. However, the County is currently in the planning process for the Siskiyou County Multi-Jurisdictional Hazard Mitigation Plan (HMP). The HMP will be a collaborative planning effort between Siskiyou County and local jurisdictions (including the City of Mount Shasta) and special districts within the County. The HMP will identify all natural hazards in Siskiyou County and will outline the history, future vulnerability, and future damage potential for each hazard. The HMP's goal is to identify mitigation projects that will reduce the vulnerability and damage potential of each hazard. The HMP will address earthquake, flood, wildfire, landslide/other earth movement, drought, severe weather/storm, dam failure, and volcano/lahar/ash-fall hazards (County of Siskiyou 2016b).

Fire Hazard

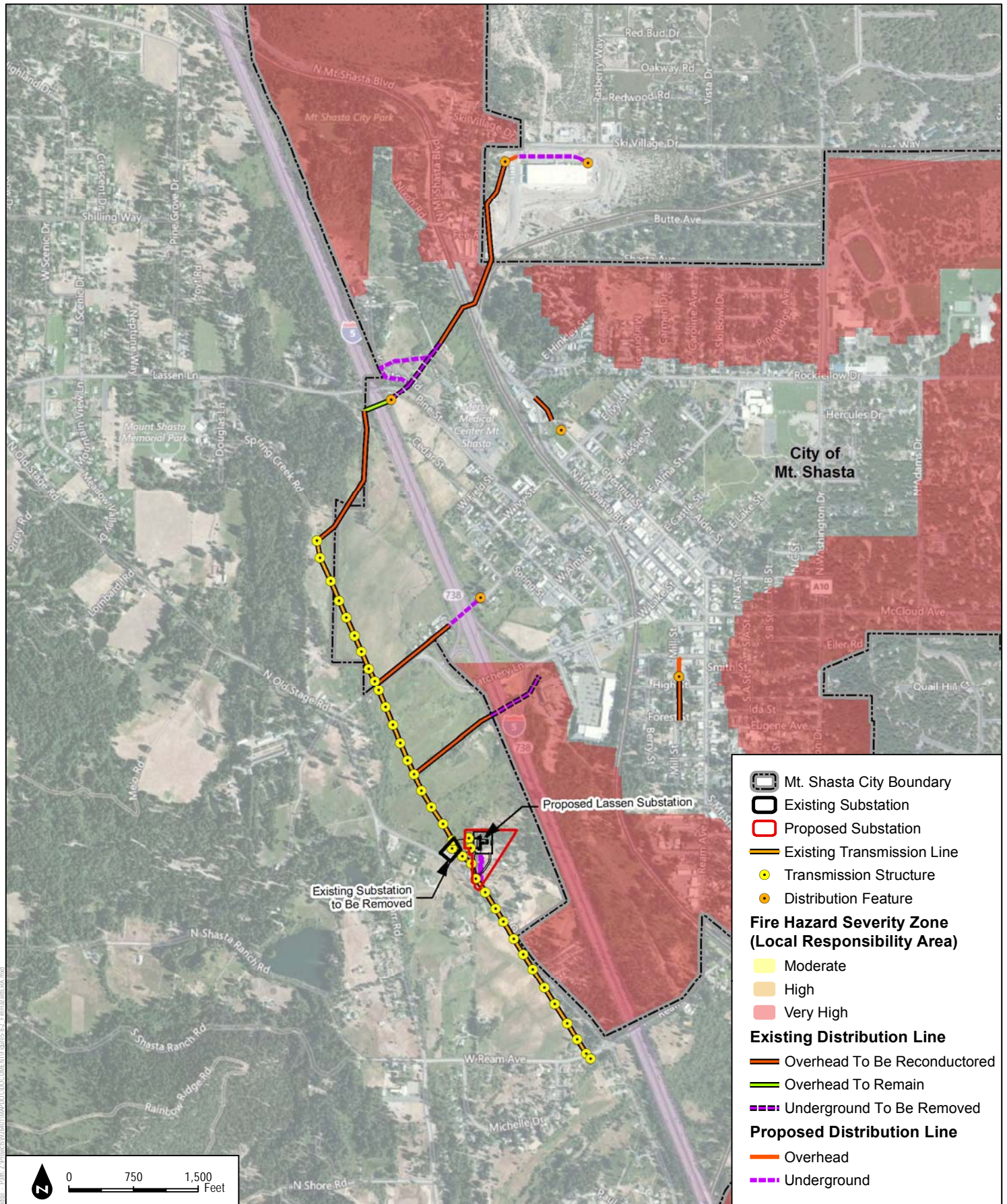
The proposed project site occurs within areas classified as Moderate, Very High, and Non-Very High Fire Hazard Severity Zones. The California Department of Forestry and Fire Protection (CAL FIRE) uses Fire Hazard Severity Zones (FHSZs) to classify anticipated fire-related hazards for the entire state and includes classifications for State Responsibility Areas, Local Responsibility Areas, and Federal Responsibility Areas. Fire hazard measures physical fire behavior based on vegetation type (fuel), topography, and weather conditions and considers fire spread rate, fire heat production, and production of embers that facilitate fire growth. Fire hazard severity represents the potential of an area to burn and the severity with which it may burn.

Based on CAL FIRE's FHSZ mapping data, the proposed project is situated in areas classified as Moderate, Very High, and Non-Very High FHSZs. Within the City of Mount Shasta, the proposed project occurs primarily within Non-Very High FHSZs, with a small portion of existing overhead distribution line near North Mount Shasta Boulevard and Road No. 2M05 and an existing underground distribution line near Interstate 5 (I-5) and West Lake Street occurring in Very High FHSZs (CAL FIRE 2009). Within unincorporated Siskiyou County, the proposed project occurs primarily within Very High FHSZs, with portions of the proposed project to the west and north of the City of Mount Shasta occurring within Moderate FHSZs (CAL FIRE 2007) (Figures 5.8-1 and 5.8-2).



Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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SOURCE: Bing Maps (2016); PacifiCorp (2015); CAL FIRE (2007)

FIGURE 5.8-2

Project Area Fire Hazard Severity Zones - Local Responsibility Areas

Lassen Substation Project

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

More recent efforts undertaken by the California Public Utilities Commission (CPUC), in coordination with CAL FIRE, attempt to map environmental conditions associated with an elevated potential for utility-associated fires. On May 26, 2016, the CPUC adopted Fire Map 1 (Rulemaking 15-05-006), which identifies areas of the state where an elevated hazard for the ignition and rapid spread of power-line fires exists due to strong winds, abundant dry vegetation, and other environmental conditions (CPUC 2016). Fire Map 1 will be the foundation for development of Fire Map 2, which will delineate the boundaries of a new High Fire-Threat District, where utility infrastructure and operations will be subject to stricter fire-safety regulations (CPUC 2016). Fire Map 2 has not yet been completed.

5.8.2 Regulatory Setting

Federal

The U.S. Environmental Protection Agency (EPA) is the principal federal regulatory agency responsible for the safe use and handling of hazardous materials. The key federal regulations pertaining to hazardous wastes are described below. Other applicable federal regulations are contained primarily in Titles 29, 40, and 49 of the Code of Federal Regulations.

Occupational Safety and Health Administration

The federal Occupational Safety and Health Administration (OSHA) enforces regulations covering the handling of hazardous materials in the workplace. The regulations established in Title 29 of the Code of Federal Regulations are designed to protect workers from hazards associated with encountering hazardous materials at the work site. The regulations require certain training, operating procedures, and protective equipment to be used at work sites where workers could encounter hazardous materials.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 (15 U.S.C. 2601 et seq.) authorizes the EPA to track industrial chemicals produced within or imported into the United States. Under this act, the EPA screens and tests industrial chemicals that pose a potential health hazard to humans or the environment. This act grants the EPA the authority to control and ban newly developed industrial chemicals and other chemicals that pose a risk in order to protect public and environmental health.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 address handling, disposal, and spill contingency measures for hazardous substances. The National Oil and Hazardous Substances

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Pollution Contingency Plan (40 CFR, Part 300) specifies the requirements for spill response activities. These laws and regulations apply to the proposed project installation activities conducted within the subject area. Under RCRA, individual states may implement their own hazardous waste programs in lieu of RCRA as long as the state program is at least as stringent as federal RCRA requirements and is approved by the EPA. The EPA approved California's RCRA program, referred to as the Hazardous Waste Control Law, in 1992.

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission requires utilities to adopt and maintain minimum clearance standards between vegetation and transmission voltage power lines. These clearances vary depending on voltage. In most cases, the minimum clearances required in state regulations are greater than the federal requirement. In California for example, the state has adopted General Order 95 rather than the North American Electric Reliability Corporation Standards as the electric safety standard for the state. Consequently, the Federal Energy Regulatory Commission and North American Electric Reliability Corporation standards are not discussed further.

National Fire Protection Association Codes, Standards, Practices, and Guides

National Fire Protection Association codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. This process brings together professionals representing varied viewpoints and interests to achieve consensus on fire and other safety issues. National Fire Protection Association standards are recommended guidelines and nationally accepted good practices in fire protection but are not law or "codes" unless adopted as such or referenced as such by the California Fire Code or the Local Fire Agency.

International Fire Code

Created by the International Code Council, the International Fire Code addresses a wide array of conditions hazardous to life and property including fire, explosions, and hazardous materials handling or usage (although not a federal regulation, but rather the product of the International Code Council). The International Fire Code places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the International Fire Code uses a hazards classification system to determine the appropriate measures to be incorporated in order to protect life and property (often these measures include construction standards and specialized equipment). The International Fire Code uses a permit system (based on hazard classification) to ensure that required measures are instituted.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Institute of Electrical and Electronics Engineers Standard 516-2003

The Institute of Electrical and Electronics Engineers is a leading authority in setting standards for the electric power industry. Standard 516-2003, Guide for Maintenance Methods on Energized Power Lines, establishes minimum vegetation-to-conductor clearances in order to maintain electrical integrity of the electrical system.

State

California hazardous materials and wastes regulations are equal to or more stringent than federal regulations. The federal EPA has granted the state primary oversight responsibility to administer and enforce hazardous waste management programs. State regulations require planning and management to ensure that hazardous materials are handled, stored, and disposed of properly to reduce risks to human health and the environment. Several key state laws pertaining to hazardous materials and wastes are discussed in the following paragraphs.

California Code of Regulations

The Title 22, Sections 66261.20–24, of the California Code of Regulations contains technical descriptions of characteristics that would classify waste material, including soil, as hazardous waste. When excavated, soils with concentrations of contaminants higher than certain acceptable levels must be handled and disposed of as hazardous waste.

Hazardous Materials Release Response Plans and Inventory Act

The Hazardous Materials Release Response Plans and Inventory Act of 1985, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes business facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as raw or unused materials that are part of a process or manufacturing step. They are not considered to be hazardous waste; however, health concerns pertaining to the release of hazardous materials are similar to those relating to the release of hazardous waste. Businesses that store hazardous materials on site must prepare a business plan and submit it to local health and fire departments. The business plan must include details of the facility and business conducted at the site, an inventory of hazardous materials that are handled and stored on site, an emergency response plan, and a safety and emergency response training program for new employees, with an annual refresher course.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Aviation Hazards

Federal Aviation Administration (FAA) Regulations Part 77 (14 CFR 77) establish height restrictions for development within approach and take-off patterns to allow aircraft maneuvering room and to ensure that neither the operating capability of the airport nor the usable runway is adversely affected by obstructions in the surrounding airspace. The FAA has an established height restriction of 150 feet for objects within 5,000 feet of the end of each runway. In addition, the FAA has notification requirements for construction within the vicinity of airports that require that the FAA be notified of any construction or alteration greater in height than the distance from the closest runway divided by 100, out to a distance of 20,000 feet. For any such projects, the FAA requires that Notice of Proposed Construction or Alteration (Form 7460) be submitted.

The FAA will determine whether the proposed project will create a hazard to navigable airspace and issue either a Determination of No Hazard or a Notice of Presumed Hazard. California Public Utilities Code Section 21659 prohibits hazards near airports (as defined by 14 CFR 77) unless a permit allowing the construction is issued by the California Department of Transportation (Caltrans) Division of Aeronautics.

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

In January 1996, the California EPA adopted regulations that implemented a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The program has six elements: (1) hazardous waste generators and hazardous waste on-site treatment, (2) USTs, (3) ASTs, (4) hazardous materials release response plans and inventories, (5) risk management and prevention programs, and (6) Unified Fire Code hazardous materials management plans and inventories. The plan is implemented at the local level and the agency responsible for implementation of the Unified Program is called the Certified Unified Program Agency.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State Hazardous Waste Management Program, which is similar to, but more stringent than, the federal RCRA program. The act defines “hazardous wastes” as waste products with properties that make them dangerous or potentially harmful to human health or the environment. Hazardous wastes can be the byproducts of manufacturing processes or simply discarded commercial products, such as cleaning fluids or pesticides. The act is implemented by regulations set forth in Title 26 of the California Code of Regulations, which describes the following required parameters for the proper management of hazardous waste:

- Identification and classification

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- Generation and transport
- Design and permitting of recycling, treatment, storage, and disposal facilities
- Treatment standards
- Operation of facilities and staff training
- Closure of facilities and liability requirements

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of them. Under the Hazardous Waste Control Act and Title 26, a generator of hazardous waste must complete a manifest that accompanies the waste from the generator to the transporter to the ultimate disposal location. Copies of the manifest must be filed with the DTSC.

California Occupational Safety and Health Administration Standards

Worker exposure to contaminated soils, vapors that could be inhaled, or groundwater containing hazardous constituents is subject to the monitoring and personal safety equipment requirements established in Title 8 of the California OSHA regulations. The primary intent of the Title 8 requirements is to protect workers, but compliance with some of these regulations also reduces potential hazards to non-construction workers and project vicinity occupants through required controls related to site monitoring, reporting, and other activities.

Utility Notification Requirements

Title 8, Section 1541 of the California Code of Regulations requires excavators to determine the approximate locations of subsurface installations such as sewer, telephone, fuel, electric, and water lines (or any other subsurface installations that may reasonably be encountered during excavation work) prior to opening an excavation. California Government Code Section 4216 et seq. requires owners and operators of underground utilities to become members of and participate in a regional notification center. According to Section 4216.1, operators of subsurface installations who are members of, participate in, and share in the costs of a regional notification center are in compliance with this section of the code. Underground Services Alert of Southern California (known as DigAlert) receives planned excavation reports from public and private excavators and transmits those reports to all participating members of DigAlert that may have underground facilities near the proposed excavation sites.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California Environmental Protection Agency

The California EPA implements and enforces a statewide hazardous materials program established by Senate Bill 1082 (1993) to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following environmental and emergency management programs for hazardous materials:

- Hazardous materials release response plans and inventories (business plans)
- California Accidental Release Prevention Program
- Underground Storage Tank Program
- Aboveground Petroleum Storage Act requirements for spill prevention, control, and countermeasure plans
- Hazardous Waste Generator and On-Site Hazardous Waste Treatment Programs
- California Uniform Fire Code: hazardous materials management plans and hazardous material inventory statements

California Fire Code

The California Fire Code is contained within Title 24, Part 9, of the California Code of Regulations. Based on the International Fire Code, the California Fire Code is created by the California Buildings Standards Commission and regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. Similar to the International Fire Code, the California Fire Code and the California Building Code use a hazards classification system to determine the appropriate measures to incorporate to protect life and property.

California Code of Regulations

Title 8, Sections 2700–2989, of the California Code of Regulations, High-Voltage Electrical Safety Orders, establish essential requirements and minimum standards for the installation, operation, and maintenance of electrical installations and equipment to provide practical safety.

Title 14, Sections 1250–1258, of the California Code of Regulations, Fire Prevention Standards for Electric Utilities, provides specific exemptions from electric pole and tower firebreak and electric conductor clearance standards, and it specifies when and where standards apply. Section 1254 of Title 14 presents guidelines for minimum clearance requirements around utility poles.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California Health and Safety Code

State fire regulations are established in Section 13000 of the California Health and Safety Code. The section establishes building standards, fire protection device equipment standards, high-rise building and childcare facility standards, interagency support protocols, and emergency procedures. Also, Section 13027 states that the state fire marshal shall notify industrial establishments and property owners having equipment for fire protective purposes of the changes necessary to bring their equipment into conformity with, and shall render them such assistance as may be available in converting their equipment to meet, standard requirements.

2010 Strategic Fire Plan for California

The 2010 Strategic Fire Plan for California is the statewide plan for adaptive management of wildfire as a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. The central goals that are critical to reducing and preventing the impacts of fire revolve around both suppression and fire prevention efforts. The key goals include the following:

1. Improved availability and use of information on hazard and risk assessment;
2. Land use planning, including general plans, new development, and existing developments;
3. Shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans;
4. Establishing fire resistance in assets at risk, such as homes and neighborhoods;
5. Shared vision among multiple fire protection jurisdictions and agencies;
6. Levels of fire suppression and related services; and
7. Post-fire recovery (CAL FIRE 2010).

Although the Strategic Fire Plan puts emphasis on pre-fire adaptive management of risk, including measures such as fuel breaks, defensible space, and other fuel reduction strategies, it does not contain any specific requirements or regulations; rather, it acts as an assessment of current fire management practices and standards and makes recommendations on how best to improve the practices and standards in place (CAL FIRE 2010).

California Department of Forestry and Fire Protection

CAL FIRE is tasked with reducing wildfire-related impacts and enhancing California's resources. CAL FIRE responds to all types of emergencies, including wildland fires and

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

residential/commercial structure fires. In addition, CAL FIRE is responsible for the protection of approximately 31 million acres of private land within the state and, at the local level, is responsible for inspecting defensible space around private residences. CAL FIRE is responsible for enforcing State of California fire safety codes included in the California Code of Regulations and California Public Resources Code. Title 14, Section 1254, of the California Code of Regulations identifies minimum clearance requirements required around utility poles.

CAL FIRE also inspects utility facilities and makes recommendations regarding improvements in facility design and infrastructure. Joint inspections of facilities by CAL FIRE and the utility owner are recommended by CAL FIRE so that each entity may assess the current state of the facility and the successfully implement fire prevention techniques and policies. Violations of state fire codes discovered during inspections are required to be brought into compliance with the established codes. If a CAL FIRE investigation reveals that a wildfire occurred as a result of a violation of a law or negligence, the responsible party could face criminal and/or misdemeanor charges (CAL FIRE 2016). In cases where a violation of a law or negligence has occurred, CAL FIRE has established the Civil Cost Recovery Program, which requires parties responsible for causing wildfires to pay for wildfire-related damages.

More detailed descriptions of the applicable codes and regulations and images of exempt and non-exempt power line structures may be found in the CAL FIRE Power Line Fire Prevention Field Guide (CAL FIRE 2008).

These regulations are discussed in further detail as follows:

- **Public Resources Code 4292** states a that a minimum firebreak of 10 feet in all directions from the outer circumference of such pole or tower be established around any pole which supports a switch, transformer, lightning arrester, line junction, or end or corner pole. All vegetation shall be cleared within the firebreak.
- **Public Resources Code 4293** establishes the minimum vegetation clearance distances (between vegetation and energized conductors) required for overhead transmission line construction. Minimum clearances are discussed as follows:
 - A minimum radial clearance of 4 feet shall be established for any conductor of a line operating at 2,400 or more volts but less than 72,000 volts.
 - A minimum radial clearance of 6 feet shall be established for any conductor of a line operating at 72,000 or more volts but less than 110,000 volts.
 - A minimum radial clearance of 10 feet shall be established for any conductor of a line operating at 110,000 or more volts but less than 300,000 volts.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- A minimum radial clearance of 15 feet shall be established for any conductor of a line operating at 300,000 or more volts.

Specific requirements applicable to the construction and operation of the proposed project include those from California Public Resources Code, Division 4, Chapter 6:

- **Section 4427** – Operation of fire-causing equipment
- **Section 4428** – Use of hydrocarbon-powered engines near forest, brush, or grass-covered lands without maintaining firefighting tools
- **Section 4431** – Gasoline-powered saws, etc.; firefighting tools
- **Section 4442** – Spark arrestors of fire prevention measures, requirements, exemptions

Fire Hazard Severity Zones

CAL FIRE mapped FHSZs in California based on fuel loading, slope, fire weather, and other relevant factors as directed by California Public Resources Code Sections 4201–4204 and California Government Code Sections 51175–51189. FHSZs are ranked from Moderate to Very High and are categorized for fire protection within a Federal Responsibility Area, State Responsibility Area, or Local Responsibility Area under the jurisdiction of a federal agency, CAL FIRE, or local agency, respectively.

California Public Utilities Commission General Orders

The California Public Utilities Commission general orders cover all aspects of design, construction, operation, and maintenance of electrical facilities in California.

General Order 95 was initially adopted in 1941 and was most recently revised in 2014 by CPUC Decision No. 14-02-015. General Order 95 governs the design, construction, and maintenance of overhead electrical lines. Rule 31.1 generally states that design, construction, and maintenance of overhead electrical lines should be done in accordance with accepted good practices for the given location conditions known at the time by the persons responsible for the design, construction, and maintenance of the overhead electrical lines and equipment. Rule 31 outlines requirements for design, construction, maintenance, and inspection of electrical supply systems.

General Order 128. Rules for Underground Electric Line Construction, includes required clearances, grounding techniques, maintenance, and inspection for underground electric lines.

General Order 131-D, Rules for Planning and Construction of Electric Generation, Line, and Substation Facilities in California, provides CPUC construction application and noticing requirements.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California Code of Regulations – Electrical Utilities

The California Code of Regulations is a catalog of state laws and regulations adopted by state agencies, including the following:

- California Code of Regulations Title 8, Section 2700 et seq., High Voltage Electrical Safety Orders, establishes essential requirements and minimum standards for installation, operation, and maintenance of electrical equipment to provide practical safety and freedom from danger.
- California Code of Regulations Title 14, Sections 1250–1258, Fire Prevention Standards for Electric Utilities, provides specific exemptions from electric pole and tower firebreak and electric conductor clearance standards, and specifies when and where standards apply.

Local

CPUC General Order 131-D explains that local land use regulations would not apply to the project. However, for information purposes, the following goals and policies included in the general plans for Siskiyou County and the City of Mount Shasta would otherwise be relevant to the project.

Siskiyou County General Plan

The Land Use and Circulation Element of the Siskiyou County General Plan identifies high wildfire hazard areas (Map 10) based on vegetation coverage and slope gradient. Although the General Plan does not include policy limitations for development in wildfire hazard areas, it does include a high constraint tone (60% screen) to ensure careful treatment and project design to minimize risk associated with wildland fires:

Policy 30. All development proposed within a wildfire hazard area shall be designed to provide safe ingress, egress, and have an adequate water supply for fire suppression purposes in accordance with the degree of wildfire hazard (County of Siskiyou 1980, Land Use Policies, p. 28).

There are no policies in the Siskiyou County General Plan related to hazardous materials.

City of Mount Shasta General Plan

The Safety Element of the City of Mount Shasta General Plan addresses fire hazards in Section D, Fire Hazards. Relevant goals, policies, and implementation measures are as follows:

Goal SF-4: Protect property and life from fire hazards.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Policy SF-4.1: Update City codes to provide for fire protection.

Implementation Measures:

- SF-4.1(a):** Amend the City's building and land development codes to incorporate fire prevention and wildfire protection measures.
- SF-4.1(b):** Utilize the expertise and experience of the area firefighting personnel to recommend a workable program that can be used to gain public cooperation in protecting property and lives against fire hazards.
- SF-4.1(c):** Require street and address signs to be clearly and legibly displayed for all streets and structures in the City.
- SF-4.1(d):** Amend the land development code to require adequate fire suppression water supplies for all new development, other than the construction of a single-family home on an existing single family parcel.
- SF-4.1(e):** Require residents to maintain defensible space around their homes and businesses consistent with state standards.
- SF-4.1(f):** The City shall review the recommendations of the *Mt. Shasta Area Community Wildfire Protection Plan* and, when found to be appropriate and otherwise consistent with City policy, support and/or implement its recommendations.
- SF-4.1(g):** In evaluating proposed measures for public safety concerning fire hazards, the City will consider, and will encourage the County to consider, the recommendations and standards set forth in the Fire Hazard Zoning Field Guide (City of Mount Shasta 2005, Safety Element, pp. 6-13, 6-14).

The Safety Element of the City of Mount Shasta General Plan addresses hazardous materials in Section E (Hazardous Materials). Relevant goals, policies, and implementation measures are as follows:

Goal SF-5: Protect people and the environment from hazardous materials exposure.

Policy SF-5.1: Assure that the use, storage, and transportation of hazardous materials complies with Federal and State regulations.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Implementation Measures:

- SF-5.1(a):** Working with the State Department of Health and the County Health Department, enforce the applicable provisions of State law related to hazardous material storage.
- SF-5.1(b):** Ensure that the Fire Department maintains the appropriate “Right-to-Know” records related to storage, use, and disposal of hazardous materials (City of Mount Shasta 2005, Safety Element, p. 6-16).

The Safety Element of the City of Mount Shasta General Plan addresses emergency response and evacuation issues in Section G, Evacuation and Related Infrastructure. Relevant goals, policies, and implementation measures are as follows:

Goal SF-7: Identify and maintain emergency evacuation routes.

Policy SF-7.1: Working with the County, identify routes to evacuate area residents for different types of emergencies.

Implementation Measure:

- SF-7.1(a):** Work with the County to establish emergency evacuation routes in the event of different categories of emergencies: severe rain or snow storm, flood, fire, volcanic or seismic (City of Mount Shasta 2005, Safety Element, pp. 6-20, 6-21).

5.8.3 Applicant Proposed Measures

The proposed project will integrate the following applicant proposed measures (APM) into the design and implementation of the proposed project to reduce impacts relating to hazards and hazardous materials.

APM-HAZ-1 Health and Safety Plan. A health and safety plan shall be prepared and made available once a contractor is procured for the construction of the proposed project. The plan should include, and not be limited to, information on the appropriate personal protective equipment to be used during construction. All transport of hazardous materials would be in compliance with applicable laws, rules, and regulations, including the acquisition of required shipping papers, package marking, labeling, transport vehicle placarding, training, and registrations.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

APM-HAZ-2 Hazardous Substance Control and Emergency Response Plan. PacifiCorp shall prepare and implement a hazardous substance control and emergency response plan as needed. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of project construction through operation. The plan would include, but not be limited to, worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on site. If it is necessary to store chemicals on site, they would be managed in accordance with all applicable regulations. Material safety data sheets would be maintained and kept available on site, as applicable.

All hazardous materials and hazardous wastes would be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:

- Proper disposal of potentially contaminated soils.
- Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources.
- Emergency response and reporting procedures to address hazardous material spills.
- Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit.

PacifiCorp will complete its Emergency Action Plan Form as part of project tailboard meetings. The purpose of the form is to gather emergency contact numbers, first aid location, work site location, and tailboard information.

APM-HAZ-3 Spill Prevention, Control, and Countermeasure (SPCC) Plan. An SPCC plan shall be prepared and certified by a professional engineer; a complete copy would be maintained on site. The SPCC plan would include engineered and operational methods for preventing, containing, and controlling potential releases and provisions for a quick and safe cleanup.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.8.4 Environmental Impacts and Mitigation

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Construction

Less Than Significant Impact. Project construction would require the transportation and use of fuels, lubricants, and solvents for construction vehicles and equipment, including trucks, cranes, backhoes, and air compressors. This equipment requires the use of hazardous materials such as gasoline, diesel, oil, hydraulic fluid, antifreeze, transmission fluid, lubricating grease and other fluids. Small quantities (less than 25 gallons) of diesel and gasoline could be stored at the staging areas to fuel small engine generators for power tool usage.

Any hazardous materials needed for construction would be stored and used in accordance with the product specifications and applicable regulations. Product specifications are described in detail on material safety data sheets (MSDS), which accompany every batch of materials considered to be hazardous. Information in the MSDS includes instructions on proper use and application of the material, accidental release measures and handling and storage requirements. Applicable regulations specify storage and handling requirements such as proper container types and usage methods. Prior to construction, all construction workers would receive training according to the health and safety plan (APM-HAZ-1), hazardous substance control and emergency response plan (APM HAZ-2), the spill prevention, control, and countermeasure (SPCC) plan (APM-HAZ-3), and applicable components of the stormwater pollution prevention plan (SWPPP) (APM-WQ-1 (see Section 5.9, Hydrology and Water Quality)). Among other things, APM-HAZ-3 and APM-WQ-1 would provide instructions for implementation of the project SWPPP, including site-specific best management practices (BMPs) required by the Regional Water Quality Board (RWQCB) through its review and approval of the SWPPP, the location of the MSDS, and notification procedures in the event of a spill, leak, or discovery of soil contamination. Examples of hazardous materials BMPs to protect surface and groundwater from possible sources of contamination include placing drip pans underneath parked vehicles, implementing tracking controls for vehicles entering and exiting the construction site, and protecting the ground surface with tarps in equipment and material storage areas. For further information regarding the SWPPP, please refer to Section 4.9.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Project construction would require excavation for underground features (distribution getaway vaults, duct banks, pole foundations, and horizontal directional drilling), as well as grading for site clearing, structure foundations, and temporary access roads. Encountering contaminated soil or groundwater during excavation and grading could result in exposure of construction workers, the public, and the environment to contaminants. As indicated in Section 5.8.1, Environmental Setting, the Phase I ESAs and regulatory agency database searches did not identify any hazardous materials sites within the project area. Although there is a relatively low potential for contaminated soil to be encountered during construction excavation and grading, in accordance with APM-HAZ-2, construction workers would be instructed on the procedures to follow in the event that unanticipated soil contamination is encountered. Suspect soil would need to be segregated, sampled, and disposed of in accordance with regulations. If chemicals are detected in the soil samples at concentrations above action levels,⁴ PacifiCorp would decide whether to remove the contaminated soil or modify the design of the proposed project to the extent necessary to avoid disturbing the contaminated soil. APM-HAZ-1 further requires that a site-specific health and safety plan be prepared and implemented that addresses the potential to encounter hazardous materials in soil. With implementation of these measures, the potential impact to public health and the environment would be less than significant.

Prior to removal of existing poles, the existing transmission lines and distribution lines (where applicable) would be transferred to the new poles. All remaining transmission and distribution line poles that would not be reused by PacifiCorp would be removed and delivered to a suitable facility for recycling. Depending on their type, condition, and original chemical treatment, the wooden poles could be reused by PacifiCorp for other purposes. If they are found to be coated and per appropriate waste determination, disposed of in an appropriately permitted disposal facility (such as a Class I hazardous waste landfill or a lined portion of a RWQCB-certified municipal landfill).

Routine transport of hazardous materials to and from project site could indirectly result in an incremental increase in the potential for accidents. However, applicable regulations under Caltrans and the California Highway Patrol regulate the transportation of hazardous materials and wastes, including container types and packaging requirements as well as licensing and training for truck operators, chemical handlers, and hazardous waste haulers. All transport of hazardous materials would be compliant with applicable laws, rules, and regulations, including the acquisition of required shipping papers, package

⁴ “Action levels” refers to chemical-specific concentration thresholds in environmental media that, if exceeded, trigger some form of regulatory oversight.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

marking, labeling, transport vehicle placarding, training, and registrations, as indicated in APM-HAZ-1. Therefore, impacts would be **less than significant**.

Demolition Activities/Decommissioning of the Existing Substation

Less Than Significant Impact with Mitigation Incorporated. Demolition of the existing Mount Shasta Substation and the two existing residences would result in the generation of various waste materials that can be recycled and salvaged. Waste items and materials would be collected by construction crews and separated into roll-off boxes at the staging areas. All waste materials that are not recycled would be characterized by PacifiCorp in order to ensure appropriate final disposal. Non-hazardous waste would be transported to local waste management facilities. When possible, waste materials from the construction of the proposed project would be delivered to the closest waste management facility, which is located within 1 mile of the proposed substation site.

The Mount Shasta Substation would be demolished and the two existing residences are likely to be demolished. PacifiCorp would be required to comply with federal and state regulations pertaining to the demolition of structures with LBP and/or asbestos-containing materials. Federal and state lead regulations (20 CFR 1926.62 and 8 CCR 1532.1) regulate the disturbance of lead-containing materials during construction, demolition, and maintenance-related activities. In the event asbestos-containing materials or LBP were found, procedural requirements would facilitate the proper and safe removal of hazardous materials. The existing substation has not been surveyed for hazardous materials such as LBP, asbestos-containing materials, PCBs, or mercury. Given the likelihood of such materials being present in the existing substation, and to ensure that structures and materials on site are adequately characterized prior to demolition and disposal, PacifiCorp shall implement Mitigation Measure (MM) HAZ-1. Implementation of MM-HAZ-1 would ensure that impacts would be **less than significant with mitigation incorporated**.

MM-HAZ-1 Prior to demolition of the Mount Shasta Substation and/or the on-site residences, a lead-based paint and asbestos survey shall be conducted by a California Occupational Safety and Health Administration-certified asbestos consultant and/or certified site surveillance technician and a California Department of Public Health-certified lead inspector/risk assessor or sampling technician. The existing Mount Shasta Substation shall also be surveyed for the presence of polychlorinated biphenyls (PCBs), mercury, and other contaminants of concern prior to site demolition activities. A report documenting material types, conditions, and general quantities will

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

be provided, along with photos of positive materials and diagrams. Demolition or renovation plans and contract specifications shall incorporate any abatement procedures for the removal of material containing PCBs, mercury, asbestos, or lead-based paint, including the appropriate soil management protocol and disposition. All abatement work shall be done in accordance with federal, state, and local regulations.

Operation and Maintenance

Less Than Significant Impact. During operation and maintenance of the project, vehicles and equipment used for routine inspections and emergency repair would require the use of fuel and lubricants inside vehicles and equipment. The proposed project site would be equipped with transformer banks that would contain mineral oil. Because the quantity of oil stored would exceed 1,320 gallons, an SPCC plan describing spill prevention measures would be required (APM-HAZ-3). This plan would be prepared and stamped by a Professional Engineer and a copy submitted to CPUC staff. Typical SPCC measures include secondary containment features such as curbs and berms designed to contain spills should they occur. These features would be part of PacifiCorp's final engineering design for the project. With compliance with hazardous materials laws and regulations, operation and maintenance impacts due to the routine transport, use, or disposal of hazardous materials would be **less than significant**.

Significance After Mitigation: With implementation of MM-HAZ-1, impacts would be **less than significant with mitigation incorporated**.

- b) *Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less Than Significant Impact. As discussed in Section 5.8.4(a), project construction would require the limited use of hazardous materials, such as fuels, lubricants, and solvents. Storage and use of hazardous materials during construction could result the accidental release of small quantities of hazardous materials, typically associated with minor spills or leaks. Spills and leaks could degrade soil and groundwater quality and/or surface water quality in nearby creeks or downstream water bodies.

Although spills and leaks during construction could occur, implementation of construction water quality BMPs required by the RWQCB through its review and approval of the SWPPP would reduce the potential for accidental releases and ensure

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

quick response to any spills to minimize impacts to the environment. As discussed in Section 5.8.4(a), hazardous materials would be stored, handled, and used in accordance with applicable regulations. All equipment and materials storage would need to be routinely inspected for leaks, and records would need to be maintained to document compliance with requirements for storage and handling of hazardous materials. Construction worker training under APM-HAZ-1, APM-HAZ-2, APM-HAZ-3, and APM-WQ-1 would provide site personnel with instruction on the SWPPP, SPCC plan, health and safety precautions, site-specific BMPs, and notification procedures in the event of a release of hazardous materials or upon the discovery of soil contamination.

During construction activities for the proposed project, the potential for encountering and damaging subsurface utilities (e.g., a natural gas line) or structures (e.g., a UST) exists, which could result in a release of hazardous material. Such incidents are unlikely, and would be avoided by thoroughly screening for subsurface utility lines and structures prior to starting subsurface work. Screening activities would include use of DigAlert, visual observations, and the use of buried-line locating equipment. Such measures are required under Title 8, Section 1541 of the California Code of Regulations and are standard practice in the construction industry.

For the reasons stated above, impacts from implementation of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- c) ***Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

Less Than Significant. The only schools within 0.25 miles of the proposed project alignment are the Mount Shasta Elementary School, which is at 501 Cedar Street, and the “I AM School,” which is at 118 Siskiyou Avenue (California Department of Education 2014). The Mount Shasta Elementary School is located approximately 500 feet east of the pulling/tensioning site on West Jessie Street. At this site, a temporary entry/exit pit, approximately 6 feet by 6 feet, would be dug to allow for the boring and placement of new 6-inch conduit under I-5. These activities would not involve acutely hazardous materials and would take a week or less to complete. The activities would require drilling mud and/or bentonite, which are not hazardous materials. The horizontal directional

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

drilling rig would require a diesel generator, but the emissions levels produced by such equipment would not exceed Siskiyou County Air Pollution Control District emissions thresholds, as indicated in Section 5.3, Air Quality (Table 5.3-6).

The “I AM School” is located approximately 0.2 miles south of the southern end of the existing overhead distribution line to be reconductored along Mill Street. Installation activities at this site would involve limited disturbance, using line trucks, guard structures (where necessary), and pilot lines to string and pull new lines through sheaves. These activities would not involve hazardous emissions or acutely hazardous materials, and would be completed in a matter of days. Reconductoring activities would not exceed Siskiyou County Air Pollution Control District emissions thresholds, as indicated in Section 5.3, Air Quality (Table 5.3-6). As indicated in Sections 5.4.8(a) and 5.4.8(b), PacifiCorp would take appropriate precautions as specified in APM-HAZ-1, APM-HAZ-2, and APM-WQ-1 to avoid spills or release of construction materials, and would take appropriate action to respond to any small-scale spills or leaks, should they occur.

Therefore, the impacts associated with such activities occurring within 0.25 miles of a school would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- d) *Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. The following hazardous materials site lists (compiled pursuant to Section 65962.5 of the California Government Code, also known as the “Cortese List”) were reviewed for sites located at or within 1 mile of the proposed project:

- Hazardous waste and substance sites from DTSC’s EnviroStor database.
- List of leaking UST sites from the SWRCB GeoTracker database.
- List of solid waste disposal sites identified by SWRCB with waste constituents higher than hazardous waste levels outside the waste management unit.⁵ Review of this list revealed no sites within 1 mile of the proposed project site.

⁵ A hazardous waste management unit is a contiguous area of land on or in which hazardous waste is placed, or the largest area in which there is significant likelihood of mixing hazardous waste constituents in the same area. Examples of hazardous waste management units include a surface impoundment, a waste pile, a land treatment area, a landfill cell, an incinerator, a tank and its associated piping and underlying containment system, and a container storage area.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- List of active cease and desist orders and cleanup and abatement orders from SWRCB. Review of this list revealed no sites within 1 mile of the proposed project site.
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the California Health and Safety Code, as identified by DTSC. This list only includes two sites in California, neither of which is near the proposed project site.

The Phase I ESA performed by Enplan in 2015 and the results of a spatial query of the EnviroStor and GeoTracker GIS databases were reviewed to determine whether the project is on a hazardous waste and substance site or a leaking UST site (the first two bullets above). As indicated in the Environmental Setting section, the project site is not located on any Cortese List (pursuant to Section 65962.5 of the California Government Code). Therefore, there would be **no impact** with respect to this criterion.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. As indicated in the Environmental Setting section, no public use airport is located in the vicinity of the project site. The closest airport is the Dunsmuir Municipal–Mott Airport, located 4 miles southeast of the project site (PacifiCorp 2015; Google Earth 2016). Google Earth was searched for evidence of any private airstrips and none were located within a 5-mile radius of the project. Proposed poles would be up to 55 feet in height and would generally replace existing, somewhat shorter poles. However, this activity has no impact on an airport land use plan because it does not exceed the FAA threshold for notification of flight obstruction (i.e., 200 feet), and does not cross into the Dunsmuir Municipal–Mott Airport compatibility zone (PacifiCorp 2015). The project would not cause visual effects such as distracting glimmer or glare due to distance and the small scale of the facilities. Therefore, the project would have **no impact** with respect to aviation safety.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

No Impact. The proposed project would have no impact for the reasons described in Section 5.8.4(e).

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- g) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less Than Significant Impact. As indicated in the Environmental Setting section, there is no official multi-jurisdictional hazard mitigation plan in place for Siskiyou County and the City of Mount Shasta (PacifiCorp 2015; County of Siskiyou 2016b). Area police, fire, and other emergency services conduct emergency operations according to their communications protocols and hazard mitigation programs.

In places where project construction may require a temporary road closure, construction activities would be coordinated with the local jurisdiction so as not to cause closure of any emergency access route. Encroachment onto public roadways would require an encroachment permit, triggering this kind of consultation. Flaggers may briefly hold traffic back for construction equipment, but emergency vehicles would be provided access even in the event of temporary road closures. Because streets would remain open to emergency vehicles at all times, construction of the project would not impact emergency access and would minimally and temporarily impact emergency evacuation. Operation and maintenance of the transmission and distribution lines would occur in the same manner and locations as under current conditions. Therefore, impacts associated with this criterion would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

Less Than Significant Impact with Mitigation Incorporated. Operation and maintenance activities for the proposed project would resemble those currently administered by PacifiCorp and activities are not expected to increase in duration, intensity, or frequency. The project would continue to be maintained in accordance with

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

CPUC General Order 95, which outlines maintenance and clearance requirements for safe operation or use of overhead lines, and General Order 165, which requires inspections of transmission facilities to ensure safe and high-quality electrical service. Therefore, impacts related to wildland fire hazards due to operation and maintenance activities would be less than significant.

The proposed project area is located within Very High FHSZs and heat or sparks from construction equipment and vehicles, as well as the use of flammable hazardous materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds. Project construction would result in up to 90 workers (maximum total) occurring in the project area for the estimated 14-month construction period. The following construction activities/equipment would have the potential to generate heat or sparks that could result in wildfire ignition:

- Earthmoving and excavating equipment – heated exhausts or sparks may result in ignition
- Chainsaws and other small gas-powered equipment/tools – may result in vegetation ignition from overheating, spark, fuel leak, etc.
- Cranes, tractors, forklifts, trucks, and vehicles – heated exhaust in contact with vegetation may result in ignition
- Welders – open heat source may result in metallic sparks coming into contact with vegetation
- Wood chippers – flammable fuels and hydraulic fluid may overheat and spray onto vegetation with a hose failure
- Compost piles – large piles that are allowed to dry and are left on site for extended periods may result in combustion and potential for embers landing in adjacent vegetation
- Dynamite/blasting – if blasting is necessary, may cause vegetation ignition from open flame, excessive heat, or contact of heated material with dry vegetation (PacifiCorp 2015)

The potential risk of wildfire ignition and spread associated with construction of PacifiCorp's proposed project can be managed and pre-planned so that the potential for vegetation ignition is reduced. In addition, pre-planning and personnel fire awareness and suppression training not only results in lower probability of ignition, but also in higher

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

probability of fire control and extinguishment in its incipient stages. Data indicate that 95% of all wildfire ignitions are controlled during initial attack (Smalley 2008).

PacifiCorp has proposed implementation of standard fire prevention protocols to reduce impacts related to wildland fire hazards due to construction activities, including clearing and grading of project work areas prior to equipment staging (PacifiCorp 2015) and preparation and implementation of a project-specific Lassen Substation Project Fire Plan (PacifiCorp 2016a). The plan would provide for fire protection and BMPs to prevent fires, including equipment use restrictions, training, firefighting equipment allocation, patrolling, and agency coordination (PacifiCorp 2016a). However, without development and implementation of PacifiCorp's Lassen Substation Project Fire Plan, construction-related impacts associated with wildland fires would be considered significant. Therefore, MM-HAZ-2 has been provided to require development and implementation of a Lassen Substation Project Fire Plan, to be developed in consultation with and approved by local fire agencies. With implementation of MM-HAZ-2, impacts related to wildland fire hazards due to construction activities would be less than significant.

MM-HAZ-2 Develop and Implement a Lassen Substation Project Fire Plan.

PacifiCorp shall develop a Lassen Substation Project Fire Plan in consultation with Mount Shasta Fire Department, the Mount Shasta Fire Protection District, and the California Department of Forestry and Fire Protection. PacifiCorp shall monitor construction activities to ensure implementation and effectiveness of the plan. The final plan will be approved by the consulted agencies prior to the initiation of construction activities and shall be implemented during all construction activities by PacifiCorp. At minimum, the plan will include the following:

- Procedures for minimizing potential ignition, including, but not limited to, vegetation clearing, parking requirements/restrictions, idling restrictions, smoking restrictions, proper use of gas-powered equipment, use of spark arrestors, and hot work restrictions
- Proper use of construction equipment
- Work restrictions during Red Flag Warnings and High to Extreme Fire Danger days
- Fire coordinator and fire patrol roles and responsibilities
- Emergency fire suppression equipment/tools, including size and documentation of response time capabilities

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- Worker training for fire prevention, initial attack firefighting, and fire reporting
- Emergency communication, response, and reporting procedures
- Coordination with local fire agencies to facilitate agency access through the project site
- Emergency contact information
- Worker education materials, tailgate meetings
- Compliance with applicable wildland fire management plans and policies established by state and local agencies
- Other information as provided by responsible and consulted agencies

Significance After Mitigation: With implementation of MM-HAZ-2, impacts would be **less than significant with mitigation incorporated.**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.9 Hydrology and Water Quality

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|-------------------------------------|-------------------------------------|
| HYDROLOGY AND WATER QUALITY – Would the project: | | | | |
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Otherwise substantially degrade water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.9.1 Environmental Setting

Regional Hydrology/Watershed

The proposed Lassen Substation Project (project) site is located within the jurisdiction of the Central Valley Regional Water Quality Control Board (CVRWQCB), which administers a water quality control plan (Basin Plan) and other water quality programs for the Sacramento and San Joaquin River Basins. The CVRWQCB is bounded by the crests of the Sierra Nevada on the east, the Coast Range and Klamath Mountains on the west, and the Cascade Range on the north. The Sacramento River Basin covers 27,210 square miles and includes the entire area drained by the Sacramento River and all its tributaries. The proposed project site is located at the northern end of the basin and drains to Siskiyou Lake (which is formed by Box Canyon Dam) and the Sacramento River via Cold Creek (CVRWQCB 2015).

The U.S. Geological Survey Watershed Boundary Dataset delineates watersheds according to hydrologic units, which are nested within one another according to the scale of interest. The U.S. Geological Survey identifies hydrologic units by name and by hydrologic unit code, which gets longer as the watershed boundaries get more detailed. The project site is within the 28.7-square-mile Cascade Gulch–Mount Shasta sub-watershed (Hydrologic Unit Code 180200050103), which is part of the Wagon Creek–Sacramento River watershed, which is within the Sacramento Headwaters sub-basin (USGS 2016).

Site Topography and Drainage

The proposed project site is located in the Strawberry Valley, which is located at the southwest base of Mount Shasta and surrounded by Black Butte to the north, Rainbow Ridge to the west, and Lake Siskiyou and the Sacramento River Canyon to the south. The proposed project alignment is located on flat to nearly flat terrain at an elevation that ranges from almost 3,700 feet above mean sea level at the northern edge of the distribution line component (near Ski Village Drive) to 3,400 feet above mean sea level at the southern end of the alignment (at West Ream Avenue) (PacifiCorp 2015; Google Earth 2016). The overall trend of topography is that it decreases in a southerly direction along the north-south axis of Strawberry Valley, with an average slope gradient of 4%—generally 2% or less in the southern half of the alignment and 10% or less in the northern half of the alignment (Google Earth 2016).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

As shown in Figure 5.9-1, Cold Creek is the only named stream in the immediate project vicinity. Cold Creek originates from Big Springs Creek, located east of the City of Mount Shasta, has a poorly defined course west through the City of Mount Shasta, and then reemerges as a distinct feature west of Old Stage Road. The northern portion of the transmission line alignment crosses Cold Creek between Poles 9/48 and 10/48. Cascade Gulch Creek is also a main creek to the northeast of the City of Mount Shasta city limits, and drains a large part of the southwest flanks of Mount Shasta. Generally, however, Strawberry Valley is a flat, low-lying spot in an otherwise mountainous terrain, and, thus, contains numerous wetland features, unnamed creeks, and drainage swales. The transmission line alignment between Poles 21/47 and 2/48 crosses an extensive area mapped as palustrine emergent wetland and palustrine scrub-shrub wetland. Refer to Section 5.4, Biological Resources, for additional information on the wetlands in the project area, including the results of the Jurisdictional Delineation Report prepared for the project.

The proposed substation site is at an elevation of approximately 3,415 feet above mean sea level, and the ground surface slopes slightly downward at less than 2.5% to the southwest (PSI 2011). There is no formal municipal storm drain system that serves the Lassen Substation site. Instead, storm runoff collects in low-lying spots, minor swales/ditches, and/or along the shoulder on the east side of South Old Stage Road. Drainage infrastructure is limited to corrugated metal pipe culverts underlying private driveways or crossing public roadways, where necessary to convey storm runoff without excessive ponding. Figure 5.9-1 shows the main streams and water features in the project vicinity.

Flood Hazards

Flood hazards in the project vicinity are localized (City of Mount Shasta 2005). The hazards are generally limited to riparian areas along streams, the shores of Lake Siskiyou, and along the Sacramento River below Box Canyon Dam. The flooding of streams is caused by seasonal flow fluctuations and peak storm events. Flooding that occurs in the project vicinity generally only affects the immediate vicinity of particular streams (City of Mount Shasta 2005). The Federal Emergency Management Agency (FEMA) has not mapped floodplains in the area, with the exception of the shore of Lake Siskiyou and a narrow fringe area along the Sacramento River (DWR 2016).

Surface Water Quality

There are no water bodies in the immediate area designated as “water quality-limited” for water quality impairments under the federal Clean Water Act (CWA), Section 303(d) (SWRCB 2012). Being “water quality-limited” means that a water body is “not reasonably expected to attain or maintain water quality standards” without additional regulation (SWRCB 2012). The law

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

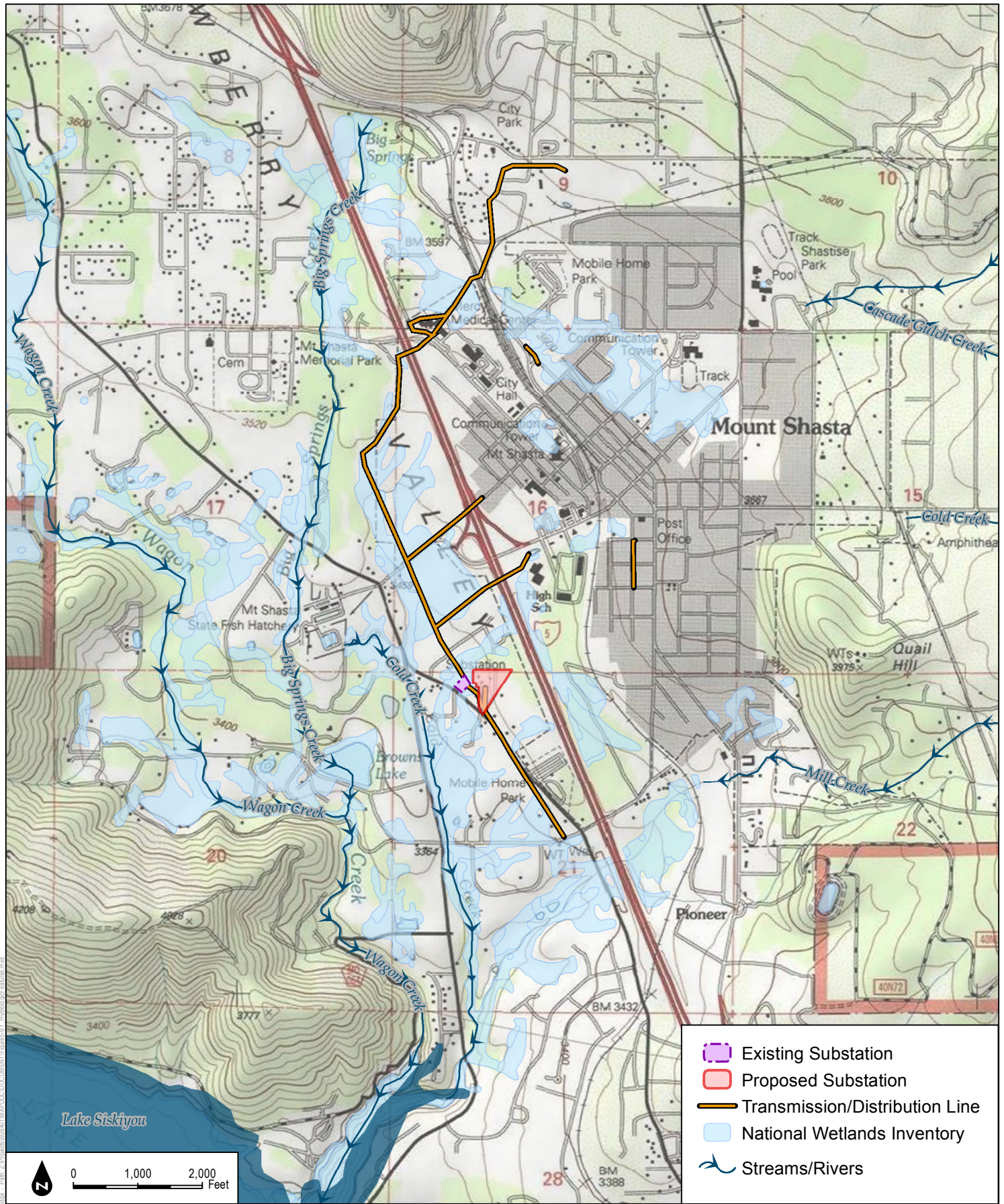
requires that the U.S. Environmental Protection Agency (EPA) develop total maximum daily loads (TMDLs) for each impaired water body in the nation (described further in Section 5.9.2). The TMDLs specify the maximum amount of a pollutant a water body can receive and still meet water quality standards. A TMDL may also include a plan for bringing an impaired water body back within standards. The most recently approved Section 303(d) List of Water Quality Limited Segments, as listed in the 2012 Integrated Report (SWRCB 2012), lists Shasta Lake as impaired with mercury, but no TMDL for mercury has been prepared or approved by the EPA.

Groundwater

The project site and the larger vicinity of Strawberry Valley are not identified as being one of California's 431 major groundwater basins and do not appear in groundwater basin maps or descriptions published by the California Department of Water Resources (DWR) (DWR 2003). Alluvial deposits in the region are likely to be thin and discontinuous, overlying older volcanic and/or granitic bedrock units that carry groundwater through fractures that may be connected or highly discontinuous, depending on the specific locale. Groundwater resources within the project vicinity originate with snowmelt and rainfall, especially on the upper slopes of Mount Shasta. The direction of groundwater movement through the area is generally downslope and southwesterly, turning southerly near the center of Strawberry Valley (City of Mount Shasta 2005). According to the City of Mount Shasta (2005), significant amounts of high-quality groundwater resources are found in the area. This is likely a result of plentiful recharge (i.e., rainfall, snowmelt, and Mount Shasta glaciers) combined with the sparsely populated nature of the area.

The City of Mount Shasta has a domestic water distribution system that is supplied by groundwater, including Cold Springs, located to the east of the city, and two groundwater wells within the city limits. The project site and outlying rural residential areas are not served by the City of Mount Shasta's water distribution system, but instead rely on private domestic wells for water supply. The occurrence and depth of groundwater in the area is not publically available or regularly tracked by DWR. When geologic borings were made for the project's geotechnical investigation, free groundwater was encountered at shallow depths, with saturated soil conditions occurring at a depth of 1 to 2.5 feet below the ground surface, and free groundwater occurring at a depth of 4 to 5 feet below the ground surface (PSI 2011). Based on this and the extensive occurrence of wetland vegetation and soils in the larger vicinity, the depth to groundwater in the vicinity is expected to fluctuate seasonally, but remain relatively shallow year-round.

The proposed substation site has an abandoned well, which was used by the former occupants as their source of water supply.



SOURCE: USGS 7.5-Minute Series City of Mount Shasta Quadrangle; USGS NHD; USFWS NWI

FIGURE 5.9-1
Hydrologic Features

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.9.2 Regulatory Setting

Federal

The Clean Water Act

The CWA (33 U.S.C. 1251 et seq.), as amended by the Water Quality Act of 1987, is the major federal legislation governing water quality. The objective of the CWA is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” Important sections of the CWA are as follows:

- CWA Sections 303 and 304 provide for water quality standards, criteria, and guidelines. Under Section 303(d), California is required to develop a list of impaired water bodies that do not meet water quality standards and objectives. California is required to establish TMDLs for each pollutant/stressor. A TMDL defines how much of a specific pollutant/stressor a given water body can tolerate and still meet relevant water quality standards. The impairments applicable to the project’s receiving waters are described in Section 5.9.1, Environmental Setting.
- CWA Section 401 (Water Quality Certification) requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the CWA. The CVRWQCB would provide review and water quality certification services for the proposed project.
- CWA Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs), which have several programs that implement individual and general permits related to construction activities, stormwater runoff quality, and various kinds of non-stormwater discharges.
- CWA Section 404 establishes a permit program for the discharge of dredged or fill material into waters of the United States. This permit program is jointly administered by the U.S. Army Corps of Engineers and EPA. A Section 404 permit is required for the discharge of dredged or fill material into waters of the United States. The Sacramento District of the U.S. Army Corps of Engineers would provide review and permitting services for the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Numerous agencies have responsibility for administration and enforcement of the CWA. At the federal level this includes EPA, the U.S. Army Corps of Engineers, the Bureau of Reclamation, and the major federal land management agencies such as the U.S. Forest Service and the Bureau of Land Management. At the state level, with the exception of tribal lands, the California EPA and its sub-agencies, including the SWRCB, have been delegated primary responsibility for administering and enforcing the CWA in California.

Federal Antidegradation Policy

The federal antidegradation policy is designed to protect water quality and water resources. The policy directs states to adopt a statewide policy that includes the following primary provisions: (1) maintain and protect existing instream uses and the water quality necessary to protect those uses; (2) where existing water quality is better than necessary to support fishing and swimming conditions, maintain and protect that quality unless the state finds that allowing lower water quality is necessary for important local economic or social development; and (3) where high-quality waters constitute an outstanding national resource, such as waters of national and state parks, wildlife refuges, and waters of exceptional recreational or ecological significance, maintain and protect that water quality.

State

Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act (Porter–Cologne Act; codified in the California Water Code, Section 13000 et seq.) is the primary water quality control law for California. Whereas the CWA applies to all waters of the United States, the Porter–Cologne Act applies to waters of the state, which includes isolated wetlands and groundwater, in addition to federal waters. The Porter–Cologne Act is implemented by the SWRCB and the nine RWQCBs. In addition to other regulatory responsibilities, the RWQCBs have the authority to conduct, order, and oversee investigation and cleanup where discharges or threatened discharges of waste to waters of the state¹ could cause pollution or nuisance, including impacts to public health and the environment.

The Porter–Cologne Act requires a “Report of Waste Discharge” for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface water or groundwater in the state. California Water Code Section 13260(a) requires that any person discharging waste or proposing to discharge waste, other than to a community sewer system, that could affect the quality of the waters of the state, file a Report of Waste Discharge

¹ “Waters of the state” are defined in the Porter–Cologne Act as “any surface water or groundwater, including saline waters, within the boundaries of the state” (California Water Code, Section 13050(e)).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

with the applicable RWQCB. For discharges directly to surface water (waters of the United States), an NPDES permit is required, which is issued under both state and federal law. For other types of discharges, such as waste discharges to land (e.g., spoils disposal and storage), erosion from soil disturbance, or discharges to waters of the state (such as groundwater and isolated wetlands), Waste Discharge Requirements are required and are issued exclusively under state law. Waste Discharge Requirements typically require many of the same best management practices (BMPs) and pollution control technologies as required by NPDES-derived permits.

Basin Planning

The California legislature has assigned the primary responsibility to administer and enforce statutes for the protection and enhancement of water quality, including the Porter–Cologne Act and portions of the CWA, to the SWRCB and its nine RWQCBs. The SWRCB provides state-level coordination of the water quality control program by establishing statewide policies and plans for implementation of state and federal regulations. The nine RWQCBs throughout California adopt and implement Basin Plans that recognize the unique characteristics of each region with regard to natural water quality, actual and potential beneficial uses, and water quality problems. The CVRWQCB is responsible for protection of the beneficial uses of waters draining to the Sacramento–San Joaquin Delta, including the project site.

The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board, Central Valley, designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Basin Plan (California Water Code Sections 13240–13247) (CVRWQCB 2015). The most water-quality-sensitive beneficial uses applicable to the Sacramento–San Joaquin Delta are REC-1 (Water Contact Recreation), WARM (Warm Freshwater Habitat), COLD (Cold Freshwater Habitat), WILD (Wildlife Habitat), and migration and spawning (MIGR and SPWN). The beneficial uses of all tributaries to Lake Siskiyou (including Cold Creek) include AGR (irrigation and stock watering), REC-1 (body contact recreation), REC-2 (other non-contact recreation) COLD, and WILD.

The Basin Plan also includes water quality objectives that are protective of the identified beneficial uses; the beneficial uses and water quality objectives collectively make up the water quality standards for the region. Selected water quality objectives from the Basin Plan are as follows:

- **Turbidity:** This objective depends on the natural turbidity of the receiving water body but generally does not allow increases of more than 2 Nephelometric Turbidity Units (NTUs) in clear waters (under 5 NTU), of more than 20% in typical waters (5–50 NTUs), or of more than 10% in turbid waters (greater than 50 NTUs).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- **pH:** Discharges should not result in pH level of creeks and lakes going under 6.5 or above 8.5.
- **Dissolved Oxygen:** Water designated as COLD shall not have dissolved oxygen reduced to below 7 mg/l [milligrams per liter]; those designated as WARM shall not have dissolved oxygen reduced to below 5 mg/l.
- **Temperature:** The temperature of receiving waters with a “COLD” or “WARM” beneficial use shall not be increased more than 5°F above the natural receiving water temperature.
- **Oil/grease, suspended material, and trash:** Water shall not contain these materials in concentrations that cause nuisance, result in visible sheen, or adversely affect beneficial uses (CVRWQCB 2015).

These objectives are applicable to the receiving water bodies in the project area, including Cold Creek and Lake Siskiyou.

The NPDES and Waste Discharge Requirement programs regulate construction, municipal and industrial stormwater, and non-stormwater discharges under the requirements of the CWA and the Porter–Cologne Water Quality Control Act. The construction stormwater program, the Phase II small municipal stormwater permit, and the statewide general permit for low-threat discharges are administered by the SWRCB, and the individual (point-source) discharger permits are administered by the CVRWQCB. The water-quality-related permits that would apply to the project are further described below. General Waste Discharge Requirements and/or NPDES permits contain effluent limitations that may be stricter than basin-wide water-quality objectives because they regulate specific categories of discharge and are designed to limit the cumulative effects of development over broad areas.

Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended). For stormwater discharges associated with construction activity in California, the SWRCB adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) to avoid and minimize water-quality impacts attributable to such activities. The Construction General Permit applies to all projects that disturb 1 acre or more of soil. Construction activities subject to this permit include clearing, grading, and disturbances to the ground, such as stockpiling and excavating. The Construction General Permit requires development and implementation of a stormwater pollution prevention plan (SWPPP), to include and specify water-quality BMPs designed to prevent pollutants from contacting stormwater and to keep all products of erosion from moving off site into receiving waters. Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals as

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

defined by the SWRCB. The project applicant must submit a Notice of Intent to the SWRCB to be covered by an NPDES permit and prepare the SWPPP prior to the beginning of construction.

General Order for Dewatering and Other Low-Threat Discharges to Surface Waters (CVRWQCB Order R5-2013-0074, as amended). The CVRWQCB has adopted a general NPDES permit for short-term discharges of small volumes of wastewater from certain construction-related activities. Discharges may be covered by the permit provided they are either 4 months or less in duration or the average dry-weather discharge does not exceed 0.25 million gallons per day. Construction dewatering and miscellaneous dewatering/low-threat discharges are among the types of discharges that may be covered by the permit. To receive coverage under this general permit, the discharger must submit a Notice of Intent to the RWQCB and describe the activity with sufficient detail to demonstrate that the discharge would comply with the discharge prohibitions, effluent limitations, and receiving water limitations outlined in the order. In no case can the discharge impair beneficial uses, violate water-quality standards, or cause a possible nuisance condition.

As described previously, the site has shallow/perched groundwater. A general permit would be required in the event that dewatering discharges to adjacent drainage swales or ditches would be necessary during foundation excavations, utility trenching, or other site construction activities. If the discharge is made to land (e.g., piped to an temporary infiltration/percolation basin on site), the applicant would need to apply for coverage under the Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality (SWRCB Order No. 2003-0003-DWQ). The intent and procedures for coverage under this permit is similar to that described above.

State Nondegradation Policy

In 1968, as required under the federal antidegradation policy described previously, the SWRCB adopted a nondegradation policy aimed at maintaining high quality for waters in California. The nondegradation policy states that the disposal of wastes into state waters must be regulated to achieve the highest water quality consistent with the maximum benefit to the people of the state and to promote the peace, health, safety, and welfare of the people of the state. The policy is as follows:

- a. Where the existing quality of water is better than required under existing water quality control plans, such quality would be maintained until it has been demonstrated that any change would be consistent with maximum benefit to the people of the state and would not unreasonably affect present and anticipated beneficial uses of such water.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Any activity that produces waste or increases the volume or concentration of waste and that discharges to existing high-quality waters is required to meet waste discharge requirements that ensure that pollution or nuisance would not occur, and the highest water quality consistent with the maximum benefit to the people of the state would be maintained.

California Water Code Section 13800

Pursuant to California Water Code Section 13800, the DWR developed standards for the destruction of wells. Well that are no longer useful must be destroyed to ensure that the groundwater supply is protected and preserved for further use, that pathways for contamination are removed, and to eliminate the well as a potential physical hazard. In destroying the well, subsurface conditions must be restored as much as possible to those conditions that existed before the well was constructed.

Local

California Public Utilities Commission General Order No. 131-D explains that local land use regulations would not apply to the project. However, for information purposes, the following goals and policies included in the general plans for the County of Siskiyou and the City of Mount Shasta would be relevant to the project.

County of Siskiyou

Aside from overarching conservation and environmental protection goals, the Siskiyou County General Plan has no policies or implementation plans related to hydrology and water quality that apply to construction, operation, or maintenance of electrical infrastructure.

City of Mount Shasta

The City of Mount Shasta General Plan Safety Element has goals and policies applicable to flooding:

Goal SF-1: Protect people and property from flooding.

Policy SF-1.1: Identify areas subject to inundation.

SF-1.1(a): Require that the limits of flooding resulting from a one hundred-year storm event be shown on all permit site plans where lands may be subject to inundation.

SF-1.1(b): When subdivisions or discretionary permits are sought for lands adjoining streams that have had a history of overtopping the banks,

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

require that an assessment be prepared by a qualified engineer or hydrologist to delineate areas likely to be subject to inundation from a one hundred-year storm event (City of Mount Shasta 2005).

The City of Mount Shasta General Plan Open Space and Conservation Element has goals and policies applicable to water resources and wetlands:

Goal OC-1: Conserve lands that support important fisheries, wildlife and botanical habitat, and wetlands.

Policy OC-1.1: Limit development on lands that provide important fisheries, wildlife and botanical habitat, and wetlands to agriculture and rural density residential.

Goal OC-2: Protect riparian habitat along streams in the Planning Area.

Policy OC-2.1: Require erosion control protection as a part of grading and development plans (City of Mount Shasta 2005).

5.9.3 Applicant Proposed Measures

The proposed project would integrate the following applicant proposed measures (APMs) into the design and implementation of the project:

APM-WQ-1 Stormwater Pollution Prevention Plan (SWPPP) or Erosion Control Plan Development and Implementation. An erosion and sediment control plan would be developed prior to construction and included as part of the required SWPPP. The goal of the SWPPP will be to remove sediment and wastes from runoff before the runoff is discharged from the project site. This would be accomplished by:

- Minimizing the acreage of disturbed and exposed soil during the construction phase and implementing stabilization measures where necessary.
- Removing sediment from runoff before it leaves the site.
- Complying with specific erosion and sediment control measures specified within the erosion and sediment control plan.

Methods may include preservation of existing vegetation or use of geomats, straw wattles, straw bale barriers, or silt fencing, which would be placed at construction boundaries. Gravel ramps may be installed at access points to public roadways to prevent or minimize the tracking of mud, dirt, sediment, or similar materials onto the roadway. Selection of appropriate erosion control materials will be based on soil properties, steepness of the slope, and anticipated surface flow or runoff.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Diesel fuel, gasoline, oil, and other lubricants, as well as adhesives and sealants, would be utilized during the construction of the transmission line and substation. Bulk quantities may be stored in the designated construction yard/staging area. Vehicle fueling and maintenance activities would be restricted to staging areas or approved areas away from drainage channels and sensitive habitats. All construction vehicles would be monitored for leaks and receive regular off-site preventive maintenance to reduce the chance of leakage.

A copy of the SWPPP and of Receipt of the Letter of Intent, including the project's Waste Discharge ID Number, will be provided to the California Public Utilities Commission prior to construction to certify compliance with Order 2009-0009-DWQ Construction General Permit. The SWPPP will be updated during construction as required by the State Water Resources Control Board.

APM-WQ-2 Restoration. To reduce visual contrast and siltation in construction where ground disturbance is substantial, surface preparation and reseeding shall occur during the last phase of construction. The method of restoration would normally consist of loosening the soil surface, reseeding, installing cross drains for erosion control, placing water bars in the road, and filling ditches. These actions shall occur in areas of exposed soils large enough that, if they remain unremediated once construction is completed, they could exceed water quality objectives of receiving waters (e.g., for sediment, turbidity, temperature, and dissolved oxygen) set forth in the Water Quality Control Plan for the Sacramento and San Joaquin River Basins.

APM-WQ-3 Pole Placement Minimization/Avoidance. To minimize the amount of sensitive features disturbed in designated areas, poles would be placed so as to avoid sensitive features and/or to allow conductors to clearly span the features, within limits of standard pole design. If the sensitive features cannot be completely avoided, poles would be placed so as to minimize the disturbance.

5.9.4 Environmental Impacts and Mitigation

a) Would the project violate any water quality standards or waste discharge requirements?

Stormwater Discharges during Construction

Less Than Significant Impact. Construction activities associated with the proposed project could increase the turbidity or otherwise degrade the water quality of receiving stream channels or other surface waterways, such as unnamed drainage ditches and swales. Activities that disturb the ground near or within a stream channel (e.g., clearing and

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

grading) could make soils and sediments more susceptible to erosion by altering their existing structure or state. Depending on the distance and ground slope, some portion of the eroded material could eventually be delivered to adjacent creeks and drainages during significant rain events. An increase in the runoff rate from a construction or staging area may result from temporarily decreasing ground surface resistance to overland flow (e.g., clearing of native vegetation or slope grading), decreasing the infiltration capacity of the soil by means of compaction (e.g., with heavy equipment), or increasing the velocity of runoff (e.g., concentrating flow into built features). In addition, if construction equipment or workers inadvertently release pollutants (e.g., hydraulic fluid or petroleum) on site, these compounds could be entrained by runoff and discharged into receiving channels, causing water-quality degradation. The extent of erosion or pollution that could occur at any given construction site would vary depending on soil type, vegetation/cover (or lack thereof), and weather conditions. Specific construction activities referenced under this potential impact include clearing and grading, excavating, and stockpiling soil or sediments.

Based on the project setting, significant problems related to increased sediment concentrations and turbidity levels in receiving stream channels as a result of the project appears unlikely. Soils in the project area have a low to moderate erosion hazard rating (see Table 4.6-1 in Section 4.6, Geology and Soils). Combined with the nearly flat topography and the disconnected and incremental nature of construction/installation activities, the transmission and distribution line components of the project have a low potential to generate significant erosion and/or sedimentation. Although the cumulative land disturbance associated with the staging and laydown areas, pulling/tensioning sites, access road improvements, and pole installation locations would be up to 7.8 acres, these disturbance areas would be small in any one place, geographically dispersed over a wide area, and be carried out in phases over a period of up to 41 weeks. Furthermore, none of the water bodies down-gradient of the project site, including Cold Creek and Lake Siskiyou, are on the CWA Section 303(d) list as impaired for sediment, which is the most likely pollutant that project construction activities would generate.

Although uncertainties exist regarding the precise response of various project-related construction areas to intense storms, the project's contribution toward total suspended sediment loads and turbidity in receiving waters is expected to be minor. Most elements of the project would involve only short-term (i.e., within a single season) construction activities, and, thus, the associated potential impacts would be short-lived. Actions associated with the project that would require appreciable soil-moving activities include site preparation and construction of the proposed Lassen Substation, grading/grubbing associated with installation of substation access roads or widening/improvement of

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

transmission line access routes, and underground work associated with horizontal directional drilling (HDD) construction. In accordance with APM-WQ-3, new poles would be placed to avoid sensitive features such as creeks and wetlands to the greatest extent possible, and would limit disturbance where such features cannot be entirely avoided.

Potential water-quality impacts of construction activity would be addressed through a number of federal and state water quality provisions and by several APMs. Because the project would be larger than 1 acre, PacifiCorp would be required to submit a Notice of Intent to the CVRWQCB to obtain approval to carry out construction activities under the General Construction Permit, as indicated by APM-WQ-1. This permit would include a number of design, management, and monitoring requirements for the protection of water quality and the reduction of construction impacts related to stormwater (and some non-stormwater) discharges. The SWPPP would apply to the project as a whole and would include reference to the major construction areas, such as the proposed Lassen Substation, materials staging areas, work areas associated with underground HDD, and work areas associated with replacement of existing transmission poles. Erosion control methods may include preservation of existing vegetation or use of geomats, straw wattles, straw bale barriers, or silt fencing, which would be placed at construction boundaries. Gravel ramps may be installed at access points to public roadways to prevent or minimize tracking mud, dirt, sediment, or similar materials onto the roadway. Selection of appropriate erosion control materials would be based on soil properties, steepness of the slope, and anticipated surface flow or runoff.

Project construction would require the limited use of hazardous materials; all hazardous materials associated with construction activities would be stored, handled, and used in accordance with applicable regulations. The SWPPP would provide detail on locations where hazardous materials may be stored during construction, and the protective measures, notifications, and cleanup requirements for any accidental spills or other releases of hazardous materials that could occur. Furthermore, APM-HAZ-2 (hazardous substance control and emergency response plan; see Section 5.8, Hazards and Hazardous Materials), although designed to protect human health, would also be protective of the environment and water quality because it contains measures to avoid, contain, and remediate any issues associated with handling/storage of hazardous materials, and encountering potentially contaminated soils.

Required compliance with applicable laws and regulations, as well as implementation of APM-WQ-1, APM-WQ-3, and APM-HAZ-2, would ensure that impacts related to project construction activities on stormwater quality would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Non-Stormwater Discharges during Construction

Less Than Significant Impact with Mitigation Incorporated. The HDD process has the potential for drilling fluid to reach the ground surface due to the pressure from the HDD operation. If drilling fluid reaches the ground surface, it would be contained with the use of sand bags or straw bales and would be pumped into a tank or back to the drill site. After the bore is complete, any excess material would be removed from the site and either reused by the drilling contractor as backfill or disposed of at an appropriate facility. Drilling fluids for HDD consist primarily of mud and bentonite clay. The portion of the alignment to be constructed using HDD would not cross creek water or water bodies (it would cross Interstate 5), which further minimizes the potential for drilling fluids to adversely affect water quality.

Due to the shallow groundwater in the area, construction activities associated with subsurface components at the proposed substation site and the HDD entry/exit pits are anticipated to require dewatering to ensure dry work areas. PSI (2011) provides several potential methods of dewatering the substation site during construction activities, which could include letting seepage accumulate in a trench or sump and pumping the water out for off-site discharge; pre-draining the site using a dewatering well; or cutting off the flow of groundwater using sheet pilings, diaphragm walls, grout, or other means. As indicated in Section 5.8, Hazards and Hazardous Materials, there is no evidence that groundwater in those locations would be contaminated or of poor quality. However, the quality of the groundwater underlying the proposed excavation sites is generally unknown. Although unlikely, there could be unreported or undetected pollutants present in the groundwater (e.g., malfunctioning off-site septic tank, unreported leaking underground storage tank). Because there is no APM associated with non-stormwater discharges, the proposed project could result in a potentially significant impact with regard to non-stormwater discharges, potentially violating water-quality standards and waste discharge requirements.

However, implementation of Mitigation Measure (MM) WQ-1 would ensure that impacts from non-stormwater discharges associated with construction activities would be **less than significant with mitigation incorporated**.

MM-WQ-1 Proper Management of Dewatering Discharges. Prior to excavation of foundations or horizontal directional drilling pits, or other activity requiring groundwater dewatering, PacifiCorp shall submit a Notice of Intent to the Central Valley Regional Water Quality Control Board (CVRWQCB) for the General Order for Dewatering and Other Low-

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Threat Discharges to Surface Waters (CVRWQCB Order R5-2013-0074, as amended). PacifiCorp shall describe the activity with sufficient detail to demonstrate the nature, location, and duration of the discharge. PacifiCorp shall send a sample of the groundwater to be discharged to a certified laboratory for analysis of priority pollutants, found in Attachment B of the General Order. If screening levels are exceeded, PacifiCorp shall implement appropriate treatment of the groundwater prior to discharge off site. Dewatering discharges shall comply with the discharge prohibitions, effluent limitations, and receiving water limitations outlined in CVRWQCB Order R5-2013-0074, and in no case shall the discharge impair beneficial uses, violate water quality standards, or cause a possible nuisance condition.

Operation and Maintenance

Less Than Significant Impact. Stormwater runoff during operation and maintenance would occur similarly to the existing conditions, since the transmission and distribution lines are above ground and located along the same alignments. The proposed Lassen Substation could slightly alter the location and quality of stormwater runoff, but would not do so in a manner that violates Basin Plan objectives or water quality standards. The substation would be designed with a drainage system, would be composed primarily of gravel, and would ensure that stormwater leaving the site does not do so at excessive speeds or volumes. As indicated in Section 5.8, Hazards and Hazardous Materials, a spill prevention, control, and countermeasure plan would be implemented to avoid or substantially minimize the impacts of accidental spills or release of fluids such as coolant or oil. For these reasons, operation and maintenance impacts of the project on water quality would be **less than significant**.

Significance After Mitigation: With implementation of MM-WQ-1, impacts would be **less than significant with mitigation incorporated**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- b) *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

Construction

Less Than Significant Impact. Should groundwater dewatering be required to provide a dry work space in excavations, any impacts would be highly localized, temporary, and limited to the bottom depth of the excavation. Any groundwater removed for construction would likely recharge the shallow groundwater at the location where it is discharged and would be of the same or similar quality. Furthermore, private/domestic wells in the immediate area, if any, are screened at much deeper intervals (generally no shallower than 50 feet), which means water levels in those wells would not be affected by shallow dewatering activities. For these reasons, groundwater dewatering would have a less-than-significant impact with respect to groundwater depletion or the groundwater levels in nearby wells.

There is an existing groundwater well on the proposed substation site that would likely require removal. Should the groundwater well be removed, it would be done in accordance with DWR regulations governing well destruction, and would not be done without first obtaining a permit from DWR. The primary consideration in removing a well is to ensure it is backfilled with appropriate sealing material to avoid cross-contamination of water-bearing strata. Through procedures required to obtain a permit and properly destroy the well, impacts would be **less than significant**.

Operation and Maintenance

No Impact. Operation and maintenance activities would occur consistent with what is currently done by PacifiCorp on the existing Mount Shasta Substation and along the existing right-of-way. Inspection, maintenance, and repair activities would not require use of groundwater. Any water used for workers or for cleaning activities would be minor and be commercially sourced. Therefore, there would be **no impact**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?*

Less Than Significant Impact. Minor alteration to existing drainage patterns could occur as part of construction. Stormwater drainage at the substation site would be designed to minimize erosion and increase sediment control, and minimize potential erosion or sedimentation impacts to adjacent wetlands. The enclosed substation surface would be covered with crushed rock (counted as semi-permeable material in Table 5.9-1) in areas where no paving or structures would be placed. As indicated in Table 5.9-1, approximately 2,220 square feet of the substation site would consist of impermeable paved surfaces associated with equipment foundations. These areas, for the most part, would be physically separated by graveled surfaces, and would constitute less than 5% of the proposed substation area. Compared to existing conditions, the proposed project would reduce the coverage of impervious surfaces by 7,800 square feet. Prior to substation construction, PacifiCorp would prepare final engineering drawings for grading and drainage, and submit these drawings to the County of Siskiyou to obtain a grading permit.

Table 5.9-1
Pre-Project versus Post-Project Impervious Surfaces

| Location | Land Cover Category | Pre-Project Conditions | Post-Project Conditions |
|----------------------------------|---------------------|-------------------------|-------------------------|
| Existing Mount Shasta Substation | Impervious | 2,140 sq ft (0.04 ac) | 2,140 sq ft (0.04 ac) |
| | Semi-pervious | 30,942 sq ft (0.70 ac) | 30,942 sq ft (0.70 ac) |
| | Pervious | 0 | 0 |
| Proposed Lassen Substation Site | Impervious | 10,019 sq ft (0.23 ac) | 2,220 sq ft (0.04 ac) |
| | Semi-pervious | 35,284 sq ft (0.81 ac) | 51,627 sq ft (1.19 ac) |
| | Pervious | 172,498 sq ft (3.96 ac) | 0 |

Source: PacifiCorp 2016.

Notes: sq ft = square feet; ac = acres.

Transmission and distribution line components would not alter drainage patterns in any significant or measurable way, as topography would be maintained and no impervious surfaces would be built. Where access would be required across streams, PacifiCorp would use temporary road platforms or geomats to minimize disturbance. All work areas would be clearly marked and construction vehicles and equipment would be prohibited from disturbing slopes and/or drainages outside the marked areas. APM-WQ-2 would ensure that temporary disturbances associated with work areas, pulling/tensioning sites, and access roads (where located in open space areas) would be restored to pre-construction conditions through soil decompaction and reseeded.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Removal of the existing Mount Shasta Substation would not alter existing drainage patterns because only aboveground components would be removed; the concrete foundation and gravel would remain.

For these reasons, and given the precautions discussed in Section 5.9.4(a), which include implementation of a SWPPP, construction and operation of the proposed project may slightly alter drainage patterns, but would not do so in a manner that would result in significant erosion or siltation. Therefore, impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- d) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

Less Than Significant Impact. For the same reasons discussed in Sections 5.9.4(a) and 5.9.4(c), the project's impacts on flooding from altered drainage patterns would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- e) *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Less Than Significant Impact. The project would result in a minor, temporary increase of surface water runoff as a result of ground clearance for construction of the new Lassen Substation; however, the access road and the substation site would be located mostly in open space and in a rural residential area that does not have an engineered stormwater drainage system. Stormwater runoff for the proposed substation site would drain south into an existing vegetated ditch on the east side of Old Stage Road, and runoff from work areas around pole structures would be contained to the fields in which they are located. Implementation of APM-WQ-1 would minimize these potential impacts to **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

f) Would the project otherwise substantially degrade water quality?

No Impact. There are no reasons other than those already discussed in the preceding sections that the project would degrade water quality; **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. The proposed project would not involve housing. Therefore, this criterion is not applicable to the project and **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less Than Significant Impact. The project site is not within a 100-year flood hazard area as mapped by FEMA or DWR. However, the site has not been extensively studied, and rather than determining the absence of flood hazards, FEMA maps indicate flood hazards to be undetermined. The transmission and distribution line components of the proposed project would be adjacent to Cold Creek and other unnamed drainages that could be subject to 100-year flood flows that could cause them to overtop their banks.

The distribution line components of the project would be above ground and would not affect or be affected by flooding. The transmission line component of the project would involve replacement of existing poles that are already within potentially flood-prone areas, and, thus, would not change the existing condition in this regard. The new wood poles would be 18 inches in diameter, which is insufficient to result in measurable changes in the volume, velocity, or extent of flood hazards due to the small cross-sectional area that they would occupy. The load requirements in California Public Utilities Commission General Order 95, including for wind, snow, and earthquakes, far exceed the load that a flood flow would impose on the transmission line poles. Therefore, these new would poles would neither affect nor be damaged by a 100-year flood flow.

The proposed substation site is not immediately adjacent to any named creeks and is outside of any mapped flood zones; thus, it is unlikely to be affected by a 100-year flood. The design of the Lassen Substation includes drainage infrastructure to route water

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

around and away from the graded pad. Below-grade components would be protected from water intrusion and the reinforced concrete foundation pads would be slightly elevated relative to the surrounding ground. It should be noted that damage or destruction of PacifiCorp facilities from pre-existing environmental hazards is not grounds for a significant impact determination under the California Environmental Quality Act (CEQA), because the project does not include structures for human occupancy or any public-use facilities.

Given these factors, project impacts related to impeding or redirecting flood flows would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. There are no dams or levees upstream of the proposed project components. As indicated above, the nearest dam is Box Canyon Dam, which forms Lake Siskiyou. Because this dam is located downgradient of the proposed project site, there would be **no impact** with regard to levee or dam failure.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

j) Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. The project site is not located near a large body of water that could be subject to seiche or tsunami waves. The project site is not located adjacent to steep slopes of hillsides and, thus, is not in an area that is at risk of a mudflow caused by heavy rains or an earthquake. A volcanic eruption on Mount Shasta, which is an extremely unlikely event, could subject the project area to mudflow, but the project does not include any action or activity that would increase the risk to off-site properties or the public from such an event. It should be noted that damage or destruction of PacifiCorp facilities from pre-existing environmental hazards is not grounds for a significant impact determination under CEQA, because the project does not include structures for human occupancy or any public-use facilities. Impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.10 Land Use and Planning

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|------------------------------------|-------------------------------------|
| LAND USE AND PLANNING – Would the project: | | | | |
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with any applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.10.1 Environmental Setting

The proposed project is predominantly located within Siskiyou County (County), in central Northern California. All elements of the proposed project associated with the substation and the upgrade to the transmission lines occur within the County. Elements of the distribution line upgrade are split between Siskiyou County and the City of Mount Shasta.

Within the County, a wide range of local land uses exist. The economy of the Mount Shasta/Siskiyou County area depends most heavily on recreation, travel, agriculture, and timber, with woodlands and open space occupying the majority of the County acreage, as described in Table 5.10-1.

**Table 5.10-1
Siskiyou County Land Use**

| Type of Use* | Percentage of Total |
|---|---------------------|
| Agriculture (cropland and pasture) | 12.1 |
| Dry grassland | 11.2 |
| Barren and sage | 19.3 |
| Woodlands | 55.3 |
| Water bodies, marshland | 0.8 |
| Urban (settlement areas, including roadways and industry) | 1.3 |

Source: County of Siskiyou 1980.

* Includes incorporated and unincorporated County, excluding land in public ownership.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Local

The project site is located approximately 0.2 mile west of the Interstate 5 corridor. The proposed substation site consists of two parcels (Assessor's Parcel Number (APN) 036-220-280 and APN 036-220-170) composing 4.5 acres in unincorporated Siskiyou County/City of Mount Shasta spheres of influence. The site is located in a rural residential area composed of residences and assorted outbuildings, undeveloped land, and the existing Mount Shasta Substation.

On APN 036-220-280, the existing property consists of a two-story wooden framed house and assorted outhouses and sheds. There is an on-site well and an on-site septic tank. APN 036-220-170 contains a single-story mobile home plus outhouses and sheds; the property also contains an on-site well but is connected to the public sewer system, although it was formerly connected to an on-site septic tank. The nearest rural residences to the proposed substation site are approximately 350 feet to the south and 450 feet to the southeast.

The existing 69-kilovolt transmission line is located on undeveloped land within unincorporated Siskiyou County and near the City of Mount Shasta. The distribution lines are located in unincorporated Siskiyou County and extend into the City of Mount Shasta. A mix of rural residences, pastures, wetlands, commercial businesses, and other various land uses generally characterizes land use in the project vicinity.

5.10.2 Regulatory Setting

Federal

No federal plans were identified as applicable to the proposed project.

State

California Public Utilities Commission

Pursuant to California Public Utilities Code 1001, the California Public Utilities Commission (CPUC) has sole and exclusive jurisdiction over the siting and design of the proposed project because it authorizes the construction, operation, and maintenance of investor-owned public utility facilities. Although such projects are typically exempt from local land use zoning regulations and discretionary permitting, California Public Utilities Code 1002(a) requires the CPUC to consider the following community factors: community values, recreational and park areas, historical and aesthetic values, and influence on the environment, which are reflected in local land use plans.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

CPUC General Order 131-D, Section XIV.B, states that “local jurisdictions acting pursuant to local authority are preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by public utilities subject to the Commission’s jurisdiction. However, in locating such projects, the public utilities shall consult with local agencies regarding land use matters.” As a public utility project that is subject to the jurisdiction of the CPUC, the proposed project is exempt from local regulation and discretionary permits. As such, the regional and local regulatory standards are provided in this analysis for informational purposes only.

Local

Siskiyou County General Plan

The Siskiyou County General Plan consists of eleven elements: Land Use, Conservation, Circulation, Housing, Open Space, Safety, Noise, Energy, Geothermal, Scenic Highway, and Seismic. The General Plan Land Use Element was adopted in 1980 and the Land Use Policies were updated in 1997; the Energy Element was last adopted in 1993. The Housing Element was adopted in August 2014.

Land Use Element

As stated in PacifiCorp 2015:

The General Plan Land Use Element does not contain mapping for specific land use designations. Rather than delineating future land use patterns on a single general plan land use map, the county uses a series of overlay maps to identify development constraint areas. In doing so, the county directs future development toward areas where critical natural resources will be avoided and, consequently, the least affected. Therefore, the location, distribution, and concentration of land uses in an area typically depend on the presence or absence of natural resources at that location. According to the Land Use Element of the Siskiyou County General Plan, the proposed project would be within the following mapped resource overlay areas: Wildlife [*sic*] Hazard, Woodland Productivity, Erosion Hazard, Prime Agricultural Soils, and Water Quality.

The following are the applicable policies established for development within those mapped resource areas (County of Siskiyou 1980):

Map 10. Wildfire Hazard

Policy 30. All development proposed within a wildfire hazard area shall be designed to provide safe ingress, egress, and have an adequate water supply for fire suppression purposes in accordance with the degree of wildfire hazard.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Map 11. Woodland Productivity

Policy 31. The minimum parcel size shall be one acre on 0–15% slope, and five acres on 16–29% slope.

Policy 32. Single family residential, light commercial, light industrial, open space, non-organizational in nature recreational uses, commercial/recreational uses, and public or quasi-public uses only may be permitted. The permitted uses will not create erosion or sedimentation problems.

Policy 33. All land uses and densities shall be designed so as not to destroy timber productivity on large parcels of high suitability woodland soil (Class I and II).

Map 2: Erosion Hazard

Policy 7. Specific mitigation measures will be provided that lessen soil erosion, including contour grading, channelization, revegetation of disturbed slopes and soils, and project timing (where feasible) to less the effect of seasonal factors (rainfall and wind).

Map 12: Prime Agricultural Soils

Policy 34. All Class I, II and III soils, that become Class III under irrigation, with the exception of Class III soils determined to be non-irrigable, are defined as prime agricultural land.

Policy 35. The minimum parcel size on prime agricultural land shall be 40 acres.

The permitted density will not create erosion or sedimentation problems.

Policy 35.1. Within the Tule lake Basin, a one-time land division can be considered containing an existing dwelling and 2.5 acres of land, provided the landowner has resided continuously within the residence since August 12, 1980, on property zoned Prime Agricultural (AG-1). This policy will allow the consideration of the division, subject to the rezoning on the proposed “homestead parcel” from Prime Agricultural to Rural Residential, 2.5 acre minimum parcel size (R-R-B-21/2). The balance of the farm will be required to meet the 40 acre Prime Agricultural minimum parcel size requirement as defined in Policy 35. This policy does not apply to land subject to a Williamson Act Contract (General Plan Amendment).

Policy 35a. Exceptions to the agricultural density requirement can only be made when the division of land is necessary to allow private financing of a land use, excluding residential housing, which is strictly agricultural in nature and necessary for the operation of the farming unit. The parcel created for private financing purposes must only be as large as necessary to construct the agricultural use and still meet minimum health and safety requirements. Written

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

documentation from the applicable financing agency or company that the land division is necessary for financing is required as proof until the proposed division of land is necessary (General Plan Amendment).

To conform to General Plan requirements, the property must be zoned PD, with the only allowable use the specific use for which the parcel is being created.

Policy 36. In commercial agricultural areas mapped as prime agricultural land but proven not to be prime agricultural land or land clearly committed to urbanization, but not within a city or service district sphere of influence, the minimum parcel size shall be 10 to 12 acres, depending on distance from major agricultural areas.

The permitted density will not create erosion or sedimentation problems.

A minimum parcel size of 20 acres is required in areas that are adjacent to or in close proximity to major commercial agricultural operations.

The intent of this policy is to allow a higher density on land that is not capable of being productive for agricultural, and at the same time regaining a residential density in the major agricultural areas of the county that is compatible with agricultural interests.

Policy 36.1. Except in Scott Valley, Prime Agricultural policies shall not apply to lands within one-quarter mile of an incorporated in the following circumstances:

- a. The property is contiguous to lands developed as heavy commercial or heavy industrial.
- b. The land is not within a sphere of influence or not presently eligible for such designation or annexation.
- c. The land is proposed for immediate development as heavy commercial or heavy industrial.
- d. The land will be zoned Planned Development to authorize the requested specific land use.
- e. The landowner will enter into a Development Agreement with the County to ensure the prompt development as requested.
- f. This policy shall not apply to lands under a Williamson Act Contract.

Policy 37. Only agricultural uses are permitted on prime agricultural land.

Policy 38. In commercial agricultural areas mapped as prime agricultural land but proven not to be prime agricultural land, single-family residential, light commercial, light industrial, open

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

space, non-profit and non-organizational in nature recreational uses, commercial/recreational uses and public or quasi-public uses may be permitted.

The permitted uses will not create erosion or sedimentation problems.

Policy 39. Proof that mapped prime agricultural soils are in fact not prime can only be done by providing the following information:

- a. Submission of a soils test prepared by a California Certified Soil Scientist.
- b. Submission of well logs that specifically demonstrate there is not enough water available for irrigation purposes.
- c. A letter from the applicable irrigation district stating that they will not and cannot provide water.
- d. Any other factual, documented information that the area is not and has not been capable of supplying enough water for irrigation.
- e. If an on-site field inspection by the Planning Department reveals that the land is not prime agricultural, the data itemized in *a*, *b*, *c*, and *d* above may not be required; i.e., obvious mapping errors.
- f. Submission of past financial records or statements that the agricultural operation is not economically feasible are not in any way considered to be adequate proof that the land is not prime.

Policy 40. All development proposals within an irrigation district shall conform to all rules, regulations, and policies of the applicable irrigation district. The intent of this policy is not to permit district regulation of land use or density, it is intended to prohibit any interference of the district's functions, such as keeping checks and irrigation ditches free and clear of any disturbance.

Map 6: Water Quality

Policy 17. Known poor quality surface and groundwater sources shall be identified and reported to the Planning Department for future development reference.

Policy 18. Because of the incidence of heavy metals, including arsenic, and other known non-potable water sources throughout Siskiyou County, random sampling should be undertaken to monitor the acceptability of water supplies for development purposes.

Policy 19. The minimum parcel size shall be one acre on 0–15% slope, and 5 acres on 16–29% slope.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The permitted density will not create erosion or sedimentation problems.

Policy 20. Single-family residential, light industrial, light commercial, open space, non-profit and non-organizational in nature recreational uses, commercial/recreational uses, and public or quasi-public uses only may be permitted.

The permitted uses will not create erosion or sedimentation problems.

Other Policies Applicable to the Proposed Project

Policy 41.3(b). All light commercial, light industrial, multiple family residential, and commercial/recreational, public, and quasi-public uses must provide or have direct access to a public road capable of accommodating the traffic that could be generated from the proposed use.

Policy 41.3(e). All proposed uses of the land shall be clearly compatible with the surrounding and planned uses of the area.

Policy 41.3(f). All proposed uses of the land may only be allowed if they clearly will not be disruptive or destroy the intent of protecting each mapped resource.

Policy 41.4. Policy conflict with city or special district General Plan — in areas within a city's or special district's sphere of influence, the adopted General Plan of the applicable city or special district shall be considered in relation to the County's General Plan Policies, except in cases where the applicable city's General Plan clearly does away with the intent of any applicable resource map.

Policy 41.5. All development will be designed so that every proposed use and every individual parcel of land created is a buildable site, and will not create erosion, runoff, access, or fire hazard or any other resource or environmental related problems.

Policy 41.6. There shall be a demonstration to the satisfaction of the Siskiyou County Health Department and/or the California Regional Water Quality Control Board that sewage disposal from all proposed development will not contaminate ground water.

Policy 41.7. Evidence of water quality and quantity acceptable to the Siskiyou County Health Department must be submitted prior to development approval.

Policy 41.8. All proposed development shall be accompanied by evidence acceptable to the Siskiyou County Health Department as to the adequacy of on-site sewage disposal or the ability to connect into an existing city or existing Community Services District with adequate capacity to accommodate the proposed development. In these cases the minimum parcel sizes and uses of the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

land permitted for all development will be the maximum density and lands uses permitted that will meet minimum water quality and quantity requirements, and the requirements of the county's floodplain management ordinance.

Policy 41.9. Buildable, safe access must exist to all proposed uses of land. The access must also be adequate to accommodate the immediate and cumulative traffic impacts of the proposed development.

Policy 41.12. All significant historic and prehistoric places and features when identified shall be preserved and protected in accordance with accepted professional practices.

Policy 41.13. All rare and endangered plant species as identified and recognized by state and federal government shall be preserved and protected in accordance with accepted professional practices.

As long as a project does not violate these policies, it will be deemed consistent with the County's General Plan. Goals and policies relating to transmission lines were not identified in the Land Use Element.

Energy uses and opportunities are assessed in the Siskiyou County General Plan Energy Element. This element establishes countywide goals and policies relating to energy. Relevant goals and policies are listed below.

Energy Element

The Siskiyou County General Plan Energy Element states (County of Siskiyou 1993):

[a]lthough many state and federal agencies maintain that their legal authorities preempt local permitting, most California counties continue to ask for and receive use permit applications from transmission facility developers.

The following Energy Element goal and policies would be applicable to the proposed project (County of Siskiyou 1993):

Goal – Energy Facilities: Thorough and expeditious evaluation of energy facility proposals; siting of such facilities in a timely, orderly, and environmentally-sound manner; and assurance of the compatible and environmentally-sound operation, maintenance, and eventual abandonment of such facilities.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Policy 31. Energy facilities shall only be approved if in compliance with all applicable provisions of the General Plan and Zoning Ordinance; and construction shall start only after all applicable federal, state, and local permits have been obtained and permit conditions satisfied.

Policy 32. In the absence of compelling or contravening considerations, energy facilities should not be sited in sensitive natural resource areas, including: unstable geologic or soil areas; floodplains; wetlands; habitat of fish or wildlife species of rare, threatened, endangered, or special concern status; known paleontological, archeological, ethnographic, or historical sites; or designated scenic areas. If siting in such areas is unavoidable, it shall be limited to the smallest possible portion of the energy facility in question, and shall be mitigated in accordance with CEQA.

Policy 33. Wherever possible, increased demand for energy transmission shall be accommodated with existing transmission facilities. Where new capacity is necessary, priority shall be given to upgrading or reconstruction of existing facilities, followed by new construction along existing facilities, followed by new construction along existing transmission or other utility corridors. Any new transmission facilities shall be sited so as to minimize interference with surrounding land-uses, and in ways that minimize their visual impacts.

Siskiyou County Zoning

Zoning districts are used to regulate how the land can be used in the County. The proposed project would traverse parcels with Multiple-Family Residential (RES-4), Neighborhood Commercial (C-U), Rural Residential Agricultural (R-R), Non-Prime Agricultural (AG-2), and Planned Development (P-D) zoning designations (PacifiCorp 2015) (Table 5.10-2).

Table 5.10-2
General Plan and Zoning Designations for the Proposed Project – Siskiyou County

| Project Component | APN | General Plan Designation | Siskiyou County Zoning Designation |
|---------------------------|-------------|---|------------------------------------|
| New substation | 036-220-280 | Prime Agricultural Soils, Wildfire Hazard, Woodland Productivity | R-R-B-5 |
| New substation | 036-220-170 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Water Quality, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-190-220 | Wildfire Hazard, Woodland Productivity | RES-4, C-U |
| Transmission line upgrade | 036-220-110 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-120 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-140 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 5.10-2
General Plan and Zoning Designations for the Proposed Project – Siskiyou County**

| Project Component | APN | General Plan Designation | Siskiyou County Zoning Designation |
|---------------------------|-------------|--|---|
| Transmission line upgrade | 036-220-150 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-280 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-170 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-190 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-200 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-220 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-230 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-5 |
| Transmission line upgrade | 036-220-260 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | AG-2 |
| Transmission line upgrade | 036-220-370 | Erosion Hazard, Wildfire Hazard, Prime Agricultural Soils, Woodland Productivity | R-R-B-1 |
| Transmission line upgrade | 036-460-121 | Erosion Hazard, Wildfire Hazard, Woodland Productivity | P-D (R-R) |

Source: PacifiCorp 2015.

Note: APN = Assessor's Parcel Number.

City of Mount Shasta General Plan

The project site is located within an area historically known as the Strawberry Valley. Distribution line upgrades and poletop transformers would be located within the City of Mount Shasta. The remaining components of the project would be located in the City of Mount Shasta's Sphere of Influence.

The City of Mount Shasta's General Plan was updated in 2007 and provides the community development plan through 2025. The general plan includes the following elements: Land Use, Circulation, Safety, Noise, Housing, and a combined Open Space/Conservation Element (City of Mount Shasta 2007). The City of Mount Shasta planning staff prepared a Draft Housing Element for the 2014–2019 planning period in August 2014 (City of Mount Shasta 2014).

The City of Mount Shasta's General Plan Land Use Map classifies the project site (transmission line upgrade component) as CC (Commercial Center) (PacifiCorp 2015). The CC land use

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

designation is intended for a wide range of commercial, office, retail, service, and entertainment uses. The General Plan (Planning Map) designates the substation component and transmission line upgrade as Low-Density Residential and Rural Residential. Low-Density Residential development consists of single-family housing areas classified as located on larger parcels (PacifiCorp 2015). According to the General Plan, “An issue related to Low-Density Residential development is the case that most of this type of development outside the City utilizes septic tanks and individual wells” (City of Mount Shasta 2007). Land immediately east of the proposed project site is under the jurisdiction of the City of Mount Shasta and has been designated CC, EC (Employment Center), and RL (Resource Land) (PacifiCorp 2015).

Circulation Element

The Circulation Element contains goals and policies that address streets and highways, public transit, rail and air transportation, non-motorized transportation, and public utilities. The following goal and policy that would be applicable to the proposed project (City of Mount Shasta 2007):

Goal CI-9: Ensure adequate utilities to meet community needs.

Implementation Measures:

CI-9.1(b): Support efforts by utilities to upgrade and improve service to the Mount Shasta area.

City of Mount Shasta Zoning

Parts of the proposed transmission line upgrades would be within the jurisdiction of the City of Mount Shasta in areas zoned U (Unclassified). The Unclassified (U) zoning district is intended to provide opportunities for development proposals with conditional use permits, consistent with the applicable General Plan land use designation, in areas that have unique development constraints. The U zone is consistent with all land use classifications of the General Plan (PacifiCorp 2015).

5.10.3 Applicant Proposed Measures

No applicant proposed measures are proposed for land use for the proposed project.

5.10.4 Environmental Impacts and Mitigation

a) Would the project physically divide an established community?

No Impact. The proposed project would be located in a predominantly rural area and would be consistent with the existing community. The proposed project would upgrade

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

and replace existing facilities in existing easements and existing roadways; therefore, it would not introduce substantial barriers that would alter or shift the existing community. Therefore, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- b) *Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

No Impact. Pursuant to Public Utilities Code 1001, as implemented in General Order 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the proposed project. It authorizes the construction, operation, and maintenance of PacifiCorp transmission facilities in California. The proposed project is therefore exempt from local land use zoning regulations and discretionary permitting. Since local City of Mount Shasta and County jurisdictions retain no discretionary action over the project, their plans are not applicable to the proposed project. However, the CPUC is expected to consider local land use policies ~~policies~~ and zoning when permitting substations and transmission line facilities.

Absent the CPUC pre-emption, only substation construction would require a conditional use permit as defined by Chapter 10.6 of the Siskiyou County Municipal Code (PacifiCorp 2015). The County designates the location of the substation as Rural Residential District (R-R). The Siskiyou County General Plan identifies the substation location as being located within a Wildlife Hazard Area, Woodland Productivity Area, Erosion Hazard Area, Prime Agricultural Soils Area, and Water Quality Area (PacifiCorp 2015).

Wildfire ~~Wildfire~~ Wildlife Hazard Area – The project was designed with ingress and egress points that satisfy fire access requirements (see Figure 4-6 in Section 4). Fire hazards are discussed in detail in Section 5.8, Hazards and Hazardous Materials, as is implementation of MM-HAZ-2 (Lassen Substation Project Fire Plan). Impacts related to wildland fire hazards due to construction activities would be less than significant and therefore consistent with Wildlife Hazard Area goals and policies.

Woodland Productivity and Prime Agricultural Soils Area – The proposed project site is currently the site of two abandoned single-family dwellings. Since the site is already occupied by a compatible non-woodland/non-agricultural use, construction of the substation would not divide, subdivide, or otherwise adversely affect woodland or agricultural resources, nor would it adversely affect adjacent or other local resources.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Therefore, the proposed project is consistent with Woodland Productivity policies and goals and Prime Agricultural Soils Area policies and goals.

Erosion Hazard Area and Water Quality Area – As discussed in Section 5.9(c), the proposed project would not adversely affect existing drainage patterns in a manner that would result in substantial erosion. The project would therefore be consistent with erosion hazard policies. Similarly, for the reasons given in Section 5.9.4(a), the project would not adversely affect water quality during construction or operation. The project would therefore be consistent with applicable Erosion Hazard Area and Water Quality Area policies.

For disclosure purposes, Table 5.10-3 provides a more detailed analysis of consistency between the proposed project and transmission/energy-specific County and City general plan policies.

Table 5.10-3
Consistency with Energy/Transmission-Specific County and City General Plan Policies

| <u>General Plan Element</u> | <u>Proposed Project</u> |
|---|--|
| <i>Siskiyou County General Plan Energy Element</i> | |
| 31. <u>Energy facilities shall only be approved if in compliance with all applicable provisions of the General Plan and Zoning Ordinance; and construction shall start only after all applicable federal, state, and local permits have been obtained and permit conditions satisfied.</u> | <u>Not applicable</u> – The County of Siskiyou has no jurisdiction over the proposed project; therefore, there is no approval to give. |
| 32. <u>In the absence of compelling or contravening considerations, energy facilities should not be sited in sensitive natural resources areas, including: unstable geologic or soil areas; floodplains; wetlands; habitat of fish or wildlife species of rare, threatened, endangered, or special concern status; known paleontological, archaeological, ethnographic, or historical sites; or designated scenic areas. If siting in such areas is unavoidable, it shall be limited to the smallest possible portion of the energy facility in question, and shall be mitigated in accordance with CEQA.</u> | <u>Consistent</u> – The substation and transmission upgrades are sited outside sensitive resource areas to the extent feasible and impacts will be fully mitigated. |
| 33. <u>Wherever possible, increased demand for energy transmission shall be accommodated with existing transmission facilities. Where new capacity is necessary, priority shall be given to upgrading or reconstruction of existing facilities, followed by new construction along existing transmission or other utility corridors. Any new transmission facilities shall be sited so as to minimize interference with surrounding land-uses, and in ways that minimize their visual impacts (Siskiyou County Planning Department 1993, Energy Facilities, Policies).</u> | <u>Consistent</u> – The proposed project would rebuild and upgrade existing transmission facilities within existing rights-of-way. The new substation is sited on already-disturbed parcels adjacent to the existing substation, thus minimizing unnecessary spread of transmission facilities. |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.10-3

Consistency with Energy/Transmission-Specific County and City General Plan Policies

| General Plan Element | Proposed Project |
|---|--|
| K.3. <u>The siting of transmission lines shall avoid interfering with scenic views, and shall be visually integrated with the surrounding setting to the greatest extent possible. Applicable visual mitigations include, but are not limited to avoiding ridgelines or other visually prominent features, and using non-glare towers and non-specular lines which more readily blend into the natural landscape (Siskiyou County Planning Department 1993, Zoning Ordinance, Implementation Measures).</u> | Consistent – As discussed in Section 5.1, <u>Aesthetics, the proposed project would not significantly interfere with a scenic vista. The rebuilding of the 69-kilovolt transmission line represents an incremental change to the existing baseline conditions. The replacement line is framed against the forest to the west of the line and is partially screened by roadside shrubs and trees along Interstate 5.</u> |
| <u>Siskiyou County General Plan Scenic Highways Element</u> | |
| <u>To protect the visual quality along scenic route corridors, the County adopted the following principles, which are applicable to the proposed project:</u> 1. <u>Provide for normal use of the land and protect against unsightly features.</u> 2. <u>Locate transmission lines and towers outside of Scenic Corridors when feasible.</u> 3. <u>Establish architectural and site design review by the appropriate local jurisdiction.</u> 4. <u>Use landscaping to increase scenic qualities (Siskiyou County Planning Department 1974, Principle C: The Scenic Route Corridor).</u> | Consistent – <u>The proposed project would not introduce new facilities into the scenic route corridor. Facilities already exist and are being upgraded.</u> |
| <u>City of Mount Shasta General Plan Open Space/Conservation Element</u> | |
| OC-7.1(d): <u>Require undergrounding of all new utilities wherever practical. Encourage other agencies and entities to underground their facilities. Where undergrounding is impractical, aboveground lines shall be located to minimize impacts on sensitive scenic areas (City of Mt. Shasta Planning Department 2007, Scenic Resources).</u> | Consistent – <u>The proposed project is not a new facility but an upgrade to existing facilities; therefore, the policy does not apply to the proposed project.</u> |

As discussed in Table 5.10-3, the The proposed project is therefore consistent with relevant Siskiyou County and City of Mount Shasta ordinances; however, since city and county discretionary actions, including land use policies, policies are preempted by the CPUC, and no impact would occur to land use plans, policies, or regulations of an agency with jurisdiction over the project.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- c) *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

No Impact. The proposed project alignment would not be located on lands within the geographic boundaries of any habitat conservation plan or natural community conservation plan; therefore, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

5.10.5 References Cited

City of Mount Shasta. 2007. *City of Mount Shasta General Plan*. Update adopted August 22, 2007.

City of Mount Shasta. 2014. City of Mt. Shasta 2014–2019 Housing Element, HCD Draft. May 2014. http://www.hcd.ca.gov/housing-policy-development/housing-resource-center/plan/he/housing-element-documents/mount_shasta_5th_draft051414.pdf.

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PacifiCorp. 2015. *Proponent’s Environmental Assessment for the Application of PacifiCorp (U 901 E) for a Permit to Construct the Lassen Substation Project*. Prepared by Power Engineers Inc. October 2015.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.11 Mineral Resources

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|------------------------------------|-------------------------------------|
| MINERAL RESOURCES – Would the project: | | | | |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.11.1 Environmental Setting

A mineral resource area refers to land on which known deposits of commercially viable mineral or aggregate deposits exist. Mineral resources include oil, natural gas, and metallic and non-metallic deposits.

The geology of the project area is described in Section 5.6, Geology and Soils, which indicates the project is underlain by alluvial deposits derived from volcanic rocks. The surrounding region is composed of mountains composed of volcanic and metamorphic rocks, as well as a series of distinct cinder cones. Prospects, past and present mines, and mineral commodity producers in the surrounding area have occurred for the following resources: gold, mercury, and uranium; sand and gravel; volcanic cinders; optical grade calcite; and clay, coal, stone, diatomite, limestone, obsidian, perlite, and pumice (PacifiCorp 2015; USGS 2016).

Oil, Gas, and Geothermal Resources

According to maps prepared by the California Division of Oil, Gas, and Geothermal Resources (DOGGR 2016), as well as a the Phase I environmental site assessment prepared for the project (Enplan 2015), no oil, natural gas, or geothermal resource areas are located in or adjacent to the project site.

Aggregate Resources

The areas underlying the project site are unlikely to be valuable from a mineral resource perspective, given the poorly sorted, fine-grained/clayey and boulder-rich character of the alluvium (PSI 2011).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The California Geological Survey (formerly the California Division of Mines and Geology) has classified mineral resources into mineral resource zones, in accordance with the California Surface Mining and Reclamation Act of 1975 (SMARA). Specific to aggregate resources, the California Geological Survey has divided California into Production-Consumption (P-C) Regions for the purpose of studying aggregate resource production and demand, classifying areas into MRZs, and identifying aggregate resource sectors. The California Geological Survey (2016) has not mapped or designated mineral resource zones within Siskiyou County. This does not necessarily mean that none occur, but that the occurrence, value, and/or demand for the resources are not high enough to have warranted active state management/classification in the region.

The closest mine to the project area, as reported in the U.S. Geological Survey Mineral Resources Online Spatial Database, is the Mount Shasta Pit, which is a gravel pit located about 2 miles north of the transmission alignment (USGS 2016). In addition, the City of Mount Shasta General Plan Open Space and Conservation Element identifies two mines in the vicinity (City of Mount Shasta 2005). The Spring Hill Mine, owned and operated by Sousa Ready Mix, is located within the City limits east of Interstate 5 at the north end of the City, or about a mile north-northwest of the northern end of the distribution line alignment. Sousa Ready Mix also owns and operates the site known as the Upton Pit, outside the City limits on the west side of Interstate 5, south of Abrams Lake Road. The Upton Pit has been mined for aggregate for many years, and the facility imports and processes aggregate from the Spring Hill Mine. The Upton Pit facility contains the operation's concrete batch plant and crushing, screening, and washing facilities. This will be the most likely source of construction-grade aggregate to be used for construction of the proposed Lassen Substation.

5.11.2 Regulatory Setting

Federal

There are no relevant federal mineral resource regulations applicable to the proposed project.

State

California Surface Mining and Reclamation Act

SMARA, as codified in the California Public Resources Code (Section 2710 et seq.), provides a comprehensive surface mining and reclamation policy for the regulation of surface mining operations to ensure that adverse environmental impacts are minimized and mined lands are restored to a usable condition. SMARA also encourages the production, conservation, and protection of the state's mineral resources. Section 2207 of the California Public Resources Code

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

provides annual reporting requirements for all mines in the state, and the State Mining and Geology Board is granted authority and obligations under this section.

SMARA also mandates the classification of lands with valuable mineral resources so that land use decisions that may affect mineral-bearing lands can be made with the knowledge of these resources. The State Mining and Geology Board classified land in California based on the availability of mineral resources. Four mineral resource zone classifications have been established for classifying sand, gravel, and crushed rock resources. The project area has not been classified with mineral resource zones under SMARA, but any mines in the larger region are subject to SMARA.

Local

The Siskiyou County General Plan has no goals or policies specific to mineral resources.

The City of Mount Shasta General Plan has policies relevant to mineral resources in its Open Space and Conservation Element:

Policy OC-6.1: Allow mineral and aggregate resource lands at appropriate locations to be commercially developed for purposes of providing construction material and industrial minerals for the area (City of Mount Shasta 2005).

5.11.3 Applicant Proposed Measures

There are no applicant proposed measures applicable to mineral resources.

5.11.4 Environmental Impacts and Mitigation

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. As indicated in Section 5.11.1, Environmental Setting, there are no known mineral resources of value to the region that underlies the proposed project site. PacifiCorp's transmission line is located within an already dedicated easement that is not currently available for mineral resource extraction. Further, portions of the transmission and distribution line routes located within public road rights-of-way are also not currently available for mineral resource extraction. In addition, the proposed new substation site is underlain by alluvium that is unlikely to be of value for aggregate. Finally, the project would not preclude or hinder access to mineral resources and mines in the larger region. For these reasons, the project would have **no impact** with respect to mineral resources.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

No Impact. The local jurisdictions in the project area do not identify any additional mineral resource areas or locally important mineral resource recovery sites beyond those already identified in the Environmental Setting. There would be **no impact** from the project to mineral resources for the same reasons discussed in Section 5.11.4(a).

Significance After Mitigation: No mitigation is required because **no impact** would occur.

5.11.5 References Cited

- California Geological Survey. 2016. "CGS Information Warehouse: Mineral Resources." Accessed August 8, 2016. <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html>.
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.12 Noise

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|-------------------------------------|-------------------------------------|
| NOISE – Would the project result in: | | | | |
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.12.1 Noise Background and Terminology

Fundamentals of Environmental Noise

Vibrations, traveling as waves through the air from a source, exert a force perceived by the human ear as sound. Sound-pressure level (referred to as sound level) is measured on a logarithmic scale in decibels, which represents the fluctuation of air pressure above and below atmospheric pressure. Frequency, or pitch, is a physical characteristic of sound and is expressed in units of cycles per second, or hertz. The normal frequency range of hearing for most people extends from approximately 20 to 20,000 hertz. The human ear is more sensitive to middle and high frequencies, especially when noise levels are on the quieter range. As noise levels get louder, the human ear starts to hear the frequency spectrum more evenly. To accommodate for this phenomenon, a weighting system to evaluate how loud a noise is to humans was developed. The frequency weighting, called “A” weighting, is typically used for quieter noise levels, and de-emphasizes the low-frequency

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

components of the sound in a manner similar to the response of a human ear. This A-weighted sound level is called the “noise level” and is referenced as an A-weighted decibel (dBA).

An individual’s noise exposure occurs over a period of time, but noise level is a measure of noise at a given instant in time. Community noise sources vary continuously as the product of different noise sources from various distances, all of which constitute a relatively stable background, or ambient, noise environment. Ambient noise levels change throughout a typical day, corresponding to such things as traffic volume and changes in atmospheric conditions.

Noise levels are generally higher during the day and early evening when traffic (including airplanes) and commercial and industrial activities are the greatest. However, noise experienced during nighttime hours, when ambient levels are generally lower, can be potentially more conspicuous and irritating to the receiver than noise during the day. To evaluate noise in a way that considers these fluctuations, a concept termed “community noise equivalent level” (CNEL) was developed, which represents averaged noise levels over a 24-hour period to reflect magnitude, duration, frequency, and time of occurrence (see the definition of CNEL provided below).

Different types of measurements are used to characterize the time-varying nature of sound. These measurements include equivalent sound level (L_{eq}), minimum and maximum sound levels (L_{min} and L_{max}), day–night sound level (L_{dn}), and CNEL. Below are brief definitions of these measurements and other terminology used in this section.

- **Decibel (dB)** is a unitless measure of sound on a logarithmic scale that indicates the squared ratio of sound pressure amplitude to a reference sound pressure amplitude. The reference pressure is 20 micropascals.
- **A-weighted decibel (dBA)** is an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent sound level (L_{eq})** is the constant level that, over a given time period, transmits the same amount of acoustic energy as the actual time-varying sound. Equivalent sound levels are the basis for day–night average sound levels (L_{dn}) and CNEL scales.
- **Maximum sound level (L_{max})** is the maximum sound level measured during the measurement period.
- **Minimum sound level (L_{min})** is the minimum sound level measured during the measurement period.
- **Day–night average sound level (L_{dn})** is a 24-hour average A-weighted sound level with a 10 dB penalty added to the nighttime and morning hours of 10:00 p.m. to 7:00 a.m. The 10 dB penalty is applied to account for increased noise sensitivity during these hours. Resulting

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

values from application of L_{dn} versus CNEL rarely differ by more than 1 dB; therefore, these two methods of describing average noise levels are often considered interchangeable.

- **Community noise equivalent level (CNEL)** is the average equivalent A-weighted sound level during 24 hours. CNEL accounts for the increased noise sensitivity during the evening hours of 7:00 p.m. to 10:00 p.m., and the nighttime and morning hours of 10:00 p.m. to 7:00 a.m. These are accounted for by adding 5 dB to the sound levels in the evening and 10 dB to the sound levels in the night/early morning. CNEL and L_{dn} are often considered equivalent descriptors.

Exterior Noise Distance Attenuation

Noise sources are classified in two forms: (1) point sources, such as stationary equipment or a group of construction vehicles and equipment working within a spatially limited area at a given time, and (2) line sources, such as a roadway with a large number of pass-by sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dBA for each doubling of distance from the source to the receptor at acoustically “hard” sites, and at a rate of 7.5 dBA for each doubling of distance from source to receptor at acoustically “soft” sites. Sound generated by a line source (i.e., a roadway) typically attenuates at a rate of 3 dBA per doubling distance for hard sites, and 4.5 dBA per doubling distance for soft sites. Sound levels can also be attenuated by built or natural barriers. For the purpose of a sound attenuation discussion, a “hard” or reflective site is typically characterized by asphalt or concrete ground surfaces and by very hard-packed soils, and an acoustically “soft” or absorptive site is characterized by unpaved, loose soil or vegetated ground.

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, or acceleration. The response of humans to vibration is complex, but it is generally accepted that it is best approximated by vibration velocity.

Heavy equipment operation, including stationary equipment that produces substantial oscillation or construction equipment that causes percussive action against the ground surface, may cause perceptible vibration for receptors. It is also common for groundborne vibration to cause windows, pictures on walls, or items on shelves to rattle. Although the perceived vibration from such equipment can be intrusive to building occupants, the vibration is seldom of sufficient magnitude to cause even minor damage to buildings.

The abbreviation VdB is used for vibration decibels. The vibration threshold of perception for most people is approximately 65 VdB. Vibration levels in the range of 70 to 75 VdB are often

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

noticeable but generally deemed acceptable, and levels in excess of 80 VdB are often considered unacceptable (FTA 2006).

5.12.2 Environmental Setting

Noise can be defined as unwanted sound, and sound is a pressure variation in the air that is detectable by the human ear. Pressure variations that occur at a minimum frequency of at least 20 times per second are audible to the human ear. Impacts from noise range from the inconvenient, such as interference with sleep and speech and can cause stress and annoyance, to more severe levels that can result in adverse health effects (e.g., loss of hearing or psychological damage).

Noise impacts to people can be placed into three categories (PacifiCorp 2015):

- Subjective effects of annoyance and nuisance
- Interference with activities such as speech, sleep, and learning
- Physiological effects such as sudden startling or hearing loss

Typical noise from surrounding human environments usually produces impacts in the first two of the above three categories. People who work in loud environments, such as at industrial plants, can experience noise in the last category.

The subjective and psychological effects of noise can be difficult to measure, especially rating reactions such as annoyance and nuisance. A wide variation exists in individual thresholds of annoyance, and different tolerances to noise can be related to an individual's past experiences with noise and their ability to "tune it out."

One way to predict a person's reaction to a new noise environment is the way new noise compares to existing ambient noise. Generally, the more a new noise exceeds the previous ambient noise level, the less acceptable the new noise will be judged by those hearing it. The following guidelines can be used to gauge a perceived level of change (PacifiCorp 2015):

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3 dBA change is considered a just-perceivable difference when the change in noise is perceived but does not cause a human response.
- A change in level of at least 5 dBA is required before any noticeable change in human response would be expected.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- A 10 dBA change is subjectively heard as approximately a doubling in loudness, and can cause an adverse response.

The above relationships occur, in part, because of how sound is perceived and measured. Because the decibel scale is based on logarithms, two noise sources do not combine in a simple additive fashion. For example, if two identical noise sources produce noise levels of 50 dBA, the combined sound level would be 53 dBA, not 100 dBA (PacifiCorp 2015).

Radio Noise

Radio interference and television interference are collectively known as radio noise. Radio interference occurs in the range of 535 to 1,605 kilohertz, and television interference occurs in the range of 54 to 88 megahertz (MHz). Radio noise interference to transmission line operation can occur during inclement weather conditions from what are called corona discharges and gap discharges. Corona discharges can occur when air surrounding a transmission line becomes ionized by the electrical field when it reaches a sufficiently high value at a particular point. Corona discharges are typically associated with transmission lines operating at voltages greater than 200 kilovolts (kV), and are most significant during inclement weather (typically rain), when water droplets occur on and trickle off of conducting wires. Cable and satellite systems are not prone to corona effects. Gap discharges, or “sparking,” can occur between pieces of transmission line equipment that are poorly fit together, including hardware, insulators, clamps, and brackets. Gap discharges occur most often during dry weather, since dampness on the line can minimize resistance in the connection, allowing the current to flow freely. Gap discharges are the primary cause of television interference, and tend to interfere with broadcasts in the UHF range (greater than 300 MHz) (PacifiCorp 2015).

Existing Noise Sources

Land uses surrounding the project area consist of rural, open space, residential, commercial, and other uses. The proposed Lassen Substation facility and transmission line would be located within unincorporated Siskiyou County. The City of Mount Shasta is located east of the proposed Lassen Substation site. The majority of the transmission line would be located to the west of the City of Mount Shasta, but approximately 1,200 feet of the transmission line upgrade would be located within the City of Mount Shasta. The area near the distribution line upgrade component consists of residences, including an apartment community for older adults; undeveloped land; medical facilities; commercial buildings; and Interstate 5 (I-5).

The primary contributors to noise in the project area are traffic along I-5 and other local roadways, and fixed noise sources relating to residential and commercial uses.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Interstate 5

I-5 is approximately 0.2 mile from the proposed project site in a rural residential area. According to the City of Mount Shasta General Plan Noise Element (Table 7-1 of the Noise Element), L_{dn} ranged from 65 dBA at a distance of 464 feet from I-5 to 60 dBA at a distance of 999 feet from I-5 in 2006 (City of Mount Shasta 2007). The proposed distribution line would cross I-5 in three locations: approximately 170 feet south of Lassen Lane, at Jessie Street, and approximately 355 feet south of West Lake Street.

Sensitive Receptors

Noise-sensitive land uses are locations where people reside or areas where unwanted sound could adversely affect users at the location. Noise-sensitive receptors include schools; residences, including housing for older adults; hospitals; and certain types of businesses. Excessive noise in an area may result in the loss of local business and annoy residents. Land uses in the vicinity of the proposed Lassen Substation consist of pastureland and open space to the north, and rural residences to the south. Land uses in the vicinity of the transmission line (Line 2) primarily consist of rural residential uses, open space, and agricultural land. Land uses in the vicinity of the distribution lines consist of rural/open space, residences, commercial uses, I-5, and medical facilities. Most of the residences in the project area are located in the City of Mount Shasta, but residences are scattered throughout the project area.

The nearest existing noise-sensitive receptors that would potentially be impacted by construction and operation of the proposed project are residences. Residential dwellings potentially impacted by installation of new poles and replacement of existing poles along the transmission line are located at various distances from proposed pole locations. The majority of the residential uses are located south of the existing and proposed substation sites, and a few scattered residences occur north of the substation sites. These residences occur approximately 70 feet to 580 feet from the pole locations. Sensitive noise receptors near the distribution line upgrade consist of residential uses, including a community for older adults.

5.12.3 Regulatory Setting

Federal

The U.S. Environmental Protection Agency (EPA) Office of Noise Abatement and Control was established to coordinate noise control activities on the federal level. It issued the federal Noise Control Act of 1972, which established programs and guidelines to identify and address the effects of noise on public health and welfare and the environment. Administrators of the EPA determined in 1981 that subjective issues such as noise would be better addressed at lower levels

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

of government. Consequently, in 1982, responsibilities for regulating noise-control policies were transferred to state and local governments. However, noise-control guidelines and regulations contained in the rulings by EPA in prior years remain upheld by designated federal agencies, allowing individualized control for specific issues by designated federal, state, and local government agencies.

State

California adopted noise standards for areas of regulation not preempted by federal laws. State standards regulate noise of motor vehicles, the transmission of sound through buildings, occupational noise standards, and noise insulation.

Vibration and Groundborne Noise Impact Regulations

The potential for excessive groundborne noise and vibration must be analyzed under the California Environmental Quality Act (CEQA); however, CEQA does not define “excessive.” Various public and private organizations and governing bodies have provided guidelines to assist in the analysis of groundborne noise and vibration, but federal, state, and local governments have yet to establish specific groundborne noise and vibration requirements. No federal, state, or local vibration regulations or guidelines are directly applicable to the proposed project.

Local

Siskiyou County General Plan

The Noise Element of the Siskiyou County General Plan contains standards applicable to the proposed project. Table 5.12-1 reflects the land use compatibility standards set by the County of Siskiyou for exterior community noise. Residential land uses are the most sensitive land uses, with a noise limit of 60 dBA L_{dn} . Noise levels for new development within a residential area are limited to 60 to 65 dBA L_{dn} , with noise abatement features incorporated (County of Siskiyou 1978).

The proposed project site is under the jurisdiction of the County of Siskiyou, and land located to the east is under the jurisdiction of the City of Mount Shasta.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.12-1
County of Siskiyou General Plan Noise Element:
Land Use Compatibility for Exterior Community Noise

| Land Use Category | Noise Ranges (dBA Ldn*) | | | |
|---|-------------------------|-------|-------|----|
| | 1 | 2 | 3 | 4 |
| Passively Used Open Space (auditoriums, parks, etc.) | 50 | 50–55 | 55–70 | 70 |
| Residential, Motels, Hospitals, etc. | 60 | 60–65 | 65–75 | 75 |
| Office Buildings, Light Commercial, Heavy Commercial, etc. | 65 | 65–70 | 70–75 | 75 |

Source: County of Siskiyou 1978.

Notes:

* Day-night average sound level that is equal to the 24-hour A-weighted equivalent sound level with a 10 decibel penalty applied to nighttime levels.

Noise Range 1 – Acceptable land use, no noise abatement required.

Noise Range 2 – New construction or development, noise abatement features included.

Noise Range 3 – New construction or development, noise abatement only after detailed analysis of noise reduction requirements.

Noise Range 4 – New construction or development not allowed.

Siskiyou County Municipal Code

Stationary-source noise is typically enforced through a noise ordinance or a jurisdiction's municipal code. The County of Siskiyou does not have an adopted Noise Ordinance; thus, limits on noise are not regulated by the Siskiyou County Municipal Code.

City of Mount Shasta General Plan

There is currently no specific Noise Ordinance to set noise standards in the City of Mount Shasta. However, Policy NZ-1.1(a) of the General Plan Noise Element states that it is the City of Mount Shasta's intent to "enact a noise control ordinance." The Mount Shasta General Plan Noise Element (Table 7-5) establishes noise standards for new uses affected by non-transportation noise. Policy NZ-1.1 states that the "standards of Table 7-5 shall be applied to both new noise-sensitive land uses and new noise-generating uses, with the responsibility for noise attenuation placed on the new use" (City of Mount Shasta 2007).

5.12.4 Applicant Proposed Measures

There are no applicant proposed measures pertaining to noise.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.12.5 Environmental Impacts and Mitigation

- a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Construction

Less Than Significant Impact. Proposed project construction noise would originate from on-site and off-site sources. On-site noise would occur from operation of heavy-duty diesel and gasoline-powered construction equipment. Off-site noise would occur from vehicles commuting to and from the job site, and from trucks transporting material to the staging areas or construction right-of-way. These sources are described below.

On-Site Noise Sources

Construction activities produce both intermittent and continuous noise. On-site construction noise would primarily come from heavy-duty construction equipment (e.g., dozers, backhoes, cranes). Construction activities required to construct the new Lassen Substation would include site preparation and grading; access road construction; concrete and form work; steel installation; equipment installation, testing, and energization; and right-of-way restoration and cleanup. Construction activities associated with the transmission and distribution lines would include access road construction, auger hole drilling, structure assembly and installation, structure erection, wire installation, and right-of-way restoration and cleanup. Construction activities also would include demolition of the existing Mount Shasta Substation and overhead structures. Construction for the Lassen Substation and the upgrade to the transmission and distribution lines would take 6 to 12 months. Work would generally occur 5 days per week for 10 hours per day between 7:00 a.m. and 5:00 p.m. Approximately 43 workers would be required for construction.

Noise from construction equipment at a distance of 50 feet is shown in Table 5.12-2. The maximum intermittent construction noise levels would range from 90 to 100 dBA at 50 feet for backhoes, bulldozers, and cranes for the substation and line construction operations. Direct noise impacts would result from construction activities occurring adjacent to sensitive receptors, such as houses and recreation areas, but this noise would be short term and would occur mostly during daylight hours.

Construction noise levels are calculated based on the assumption that noise from a localized source is reduced by approximately 6 dBA with each doubling of distance from the source. Noise levels for the proposed project would vary for different construction

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

tasks, but the maximum anticipated noise levels would occur from bulldozers and drilling operations; impacts would be **less than significant**.

Table 5.12-2
Construction Noise Sources

| Equipment | Range of Noise Levels (dBA) at 50 Feet |
|------------------------------|--|
| <i>Earth Moving</i> | |
| Front loaders | 66–93 |
| Backhoes | 72–92 |
| Tractors, Dozers | 68–93 |
| Scrapers, Graders | 72–92 |
| Pavers | 76–85 |
| Trucks | 65–92 |
| Rollers | 66–83 |
| <i>Material Handling</i> | |
| Concrete mixers | 67–86 |
| Concrete pumps | 68–81 |
| Cranes (moveable) | 70–92 |
| Cranes (derrick) | 80–83 |
| Forklifts | 76–82 |
| Tensioners | 76–86 |
| Cable pullers | 74–82 |
| <i>Pneumatic tools</i> | |
| Pneumatic wrenches | 84–88 |
| Jack hammers and rock drills | 72–93 |
| Compactors | 80–83 |

Source: WIA 1986.

Off-Site Noise Sources

Construction noise from off-site sources during construction would occur primarily from commuting workers and from truck trips to and from the construction site. The procedure for transporting personnel, materials, and equipment to each structure site would vary along the route alignment. It is assumed that truck trips would be required to haul structures, conductor line, and other materials to the construction sites. Peak noise levels associated with passing trucks and commuting worker vehicles (approximately 70 to 75 dBA at 50 feet) would be short term and would generate adverse but **less than significant** impacts.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Operation

Less Than Significant Impact. During the project's operational lifetime, noise generated by the new transformer would be comparable to noise generated by the transformer at the existing Mount Shasta Substation. Based on the specifications of the proposed transformer (115 kV by 69/12.5 kV, 15/20/25 megavolt ampere (MVA)), it would generate noise of approximately 53 dBA at 50 feet and 33 dBA at 500 feet. Thus, transformer noise at the closest residences (345 feet and 450 feet from the proposed project) would not exceed the County of Siskiyou's maximum noise exposure levels from a stationary source.

Compared to the existing 69 kV transmission line, the proposed transmission line would produce a negligible increase in noise levels. Thus, operation of the project's transmission line would not result in the generation of noise louder than 60 dBA, which is the Siskiyou County noise standard for the area. Therefore, potential impacts from operation of the transmission line would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- b) *Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

Construction

Less Than Significant Impact. Demolition of the existing Mount Shasta Substation, construction of the Lassen Substation and associated transmission line, and activities associated with distribution line upgrades (tamping of ground surfaces, drilling, and driving heavy trucks on uneven surfaces) may produce minor groundborne vibrations in the immediate vicinity of construction. Impacts from construction-related groundborne vibration, should they occur, would be intermittent and confined to the immediate area surrounding the activity; therefore, impacts would be **less than significant**.

Operation

Less Than Significant Impact. Operation of the proposed project would involve routine maintenance activities and infrequent emergency repairs. These activities are unlikely to produce perceptible levels of groundborne vibration. Operation of transformers at the Lassen Substation could produce groundborne vibration; however, groundborne vibrations would be perceptible only in the immediate vicinity of the transformer pad, if at all, and would therefore be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- c) *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

Less Than Significant Impact. Permanent noise sources from the proposed project would be limited to the transmission/distribution line (conductors and insulators) and transformer operation at the proposed Lassen Substation.

Transmission Line Operation

Audible Noise

The typical noise range for the proposed transmission line when operated at the initial 69 kV and the planned 115 kV would be negligible at the center of the line and at the edge of the right-of-way because of the low electric field gradients from the transmission line, even in rainy conditions. Compared to the existing 69 kV transmission line, the proposed transmission line would not generate an increase in audible noise. Thus, operation of the project's transmission line would not result in the generation of noise louder than 60 dBA, which is the Siskiyou County noise standard for the area. Therefore, potential impacts from operation of the transmission line would be **less than significant**.

Radio Noise

For transmission lines with typical conductor spacings and rights-of-way, a fair-weather radio interference level of 40 dB per microvolt per meter (dB μ V/m) at a lateral distance of 100 feet from the outermost phase has been established as a guideline for design criteria for radio noise limits (EPRI 2006). Radio interference levels from the Mount Shasta Substation transmission line would be less than 20 dB μ V/m under fair weather conditions. This would be a **less than significant** impact.

Substation Operation

During project operation, transformers, reactors, voltage regulators, and circuit breakers have the potential to generate audible noise within the proposed substation. Among these sources, transformers and reactors are the most likely to produce audible noise, usually in the form of a low-frequency humming. Fans, pumps, and coolers can also contribute to the noise level, but typically blend in with existing ambient noise.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The low humming noise generated by operation of substation equipment at the proposed project site would be mostly contained on site and would not result in a permanent increase in ambient noise levels in the vicinity. Residences close to the proposed project site are already exposed to noise associated with operation of the existing Mount Shasta Substation, and operation of a new substation at this location would not result in any appreciable increase to existing average ambient noise. Therefore, the proposed project would not cause a substantial permanent increase in ambient noise levels near the proposed project site above levels existing without the project; impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

Construction

Less Than Significant Impact. Project construction noise would be generated by on-site and off-site sources, as discussed in greater detail in significance question (a), above. On-site construction noise would result from operation of heavy-duty construction equipment such as bulldozers, backhoes, and cranes. Off-site noise would be generated by trucks transporting construction materials and by workers traveling to and from the staging areas, transmission line right-of-way, and substation site. Noise from individual pieces of construction equipment would typically range from 70 dBA to 100 dBA at a distance of approximately 50 feet, as indicated in Table 5.12-2. Construction noise would be audible to residences located in the vicinity of the project site. However, these noise levels would be short term and would occur during daytime hours only. Compared to existing noise sources in the area (e.g., vehicles on adjacent roads and I-5, farming equipment), these intermittent noises would not represent a significant change or impact over existing noises in the vicinity.

Demolition of the existing Mount Shasta Substation, construction of the new Lassen Substation, and construction of transmission and distribution line upgrades would involve temporary and intermittent use of trucks to haul construction materials and bring personnel to and from the substation site, staging areas, and transmission and distribution line rights-of-way. The substation and transmission/distribution line construction activities would occur in rural agricultural areas, although some activities would occur in or adjacent to rural residential areas. Construction activities in proximity to residential areas would occur between 7:00 a.m. and 7:00 p.m.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Although impacts associated with demolition and construction activities would be **less than significant**, the following noise-reducing practices would be in place to further reduce noise produced by these activities:

- Muffler requirements set by the manufacturer would be adhered to.
- Engines would be turned off when not in use, as applicable.
- Unnecessary use of equipment would be minimized.
- Compressors and other small stationary equipment would be shielded with portable barriers.
- “Quiet” equipment (i.e., equipment that incorporates noise-control elements into the design, including some models of jackhammers and compressors) would be used as much as possible.
- Equipment exhaust stacks/vents would be directed away from buildings.
- Truck traffic would be routed away from noise-sensitive areas where feasible.

Operation

Less Than Significant Impact. Operation of the proposed project would involve periodic short-term inspections and maintenance activities. Although the Lassen Substation would not have on-site staff and would, instead, be remotely monitored, routine maintenance activities would occur, consisting of testing, monitoring, and repairing equipment. Maintenance of the transmission/distribution lines would occur on an as-needed basis, and activities would include repairing conductors, replacing insulators, replacing poles, and maintaining the access road. Because operations would involve limited activity, the proposed project would not contribute to a substantial increase in ambient noise in the area and impacts would be **less than significant**.

Significance After Mitigation: Mitigation is not required because impacts would be **less than significant**.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The nearest public use airport is the Dunsmuir Municipal–Mott Airport, located approximately 4 miles southwest of the project site. No noise impacts associated

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

with airport operations are anticipated to affect people working on the project site. **No impacts** would occur.

Significance After Mitigation: Mitigation is not required because **no impact** would occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. No private airstrips are located within the vicinity of the project site. Therefore, the proposed project would not expose people working on the proposed project to excessive noise levels attributable to an airport or private airstrip during construction, operation, or decommissioning. There would be **no impact** as a result of the proposed project.

Significance After Mitigation: Mitigation is not required because **no impact** would occur.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.13 Population and Housing

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|-------------------------------------|-------------------------------------|
| POPULATION AND HOUSING – Would the project: | | | | |
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.13.1 Environmental Setting

The proposed project is located in southern Siskiyou County (County). Portions of the project site are located in unincorporated Siskiyou County and within the incorporated City of Mount Shasta (City). The existing substation and site of the proposed substation and new right-of-way (ROW) acquisition are within the City of Mount Shasta's Planning Area, which extends the City's influence and proposed future land use designations into portions of unincorporated County that border the City. The remainder of the project site, those areas proposed for transmission line upgrades along Line 2 and the upgrade of two existing distribution lines, is within existing utility ROWs, portions of which are in Siskiyou County and the City of Mount Shasta. Rural residential, agricultural, and undeveloped land uses predominate in the area around the existing and proposed substation site, and a variety of land uses, including rural and urban residential, Interstate 5 (I-5), commercial and office buildings, light industrial, and a hotel and senior housing community exist in the vicinity of the proposed distribution line upgrades and ROW.

Population

The most recent available Department of Finance data indicates that unincorporated areas in Siskiyou County had an overall population of 44,739 in January 2016, with a population of 24,260 in unincorporated areas of the County and 20,479 in incorporated areas of Siskiyou County. The 2016 population of the City of Mount Shasta is reported as 3,367 (DOF 2016a). Between 2000 and 2010 the U.S. Census population in unincorporated Siskiyou County grew at a relatively slow 2.5% growth rate (Siskiyou County 2014). The Department of Finance (2014) population projections are summarized in Table 5.13-1 and indicate that the population in

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Siskiyou County will increase from an estimated 45,400 in 2015 to 46,217 in 2020, which translates into a growth in population of only 1.8% over the 5-year period. This represents a slow rate of population growth in the County overall. From 2020 to 2030, the population is expected to maintain a slow growth rate and increase only 1.7% to 47,013 (DOF 2014).

Table 5.13-1
Estimated Population Growth, Siskiyou County, 2015 to 2020

| Year | Population | % Change from Previous 5 years |
|------|------------|--------------------------------|
| 2015 | 45,400 | 0.9% |
| 2020 | 46,217 | 1.8% |

Source: DOF 2014.

The most recent Department of Finance data indicate that unincorporated areas of the County experienced a 0.2% decrease in population, from 24,285 to 24,156, between 2010 and 2013. From 2014 to 2016, Department of Finance data indicate that the unincorporated areas of the County experienced a 0.3% increase in population, from 24,176 in January 2014 to 24,260 in January 2016, and that incorporated areas in Siskiyou County lost 0.8% population during the same period, decreasing from 20,635 in 2014 to 20,479 in 2016. Over the same period the City of Mount Shasta lost one person, from a population of 3,368 in 2014 to 3,367 in 2016 (DOF 2016a).

The Department of Finance does not provide population projections for the City of Mount Shasta. From 2003 to 2013, the City's population declined at an average rate of 0.83% per year. However, the City's general plan projects an annual growth rate of 0.63% per year over the planning period. Assuming the general plan growth rate for the City and based on a 2010 population of 3,831, the City of Mount Shasta would have a population of 4,131 in 2020 (City of Mount Shasta 2014). However, with population declines in recent years, the population may not reach that level by 2020.

Housing

Scattered rural residential land uses are present in the vicinity of the existing and proposed substation and two vacant homes and associated rural outbuildings exist on the project site. The Department of Finance (2016b) estimates a housing unit vacancy rate of 10.1% for Siskiyou County overall and a 13.5% vacancy rate for unincorporated areas of the County. The City of Mount Shasta is estimated to have a 13.1% housing unit vacancy rate (DOF 2016b).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.13.2 Regulatory Setting

Federal

There are no relevant federal policies related to population and housing.

State

General Plans

State planning and zoning law requires each city and county to adopt a general plan for its future growth (California Government Code, Section 65300). The general plan must include a housing element that identifies housing needs for all economic segments and provide opportunities for housing development to meet those needs. At the state level, the Housing and Community Development Department estimates the relative share of California's projected population growth that is projected to occur in each county presented by the California Department of Finance's demographic research unit.

Each city and county must update its general plan housing element on a regular basis (usually every 5 years). Among other things, the housing element must incorporate policies and identify potential sites that would accommodate the City's and the County's share of the regional housing need. The 2014 Siskiyou County Housing Element and 2014 City of Mount Shasta Housing Element identify policies to accommodate housing to provide for each jurisdiction's share of the regional housing need. Each of these plans is described below.

Local

Siskiyou County General Plan and Zoning Ordinance

The Siskiyou County General Plan, as the county's foundational land use and development policy document, establishes the type, density, and extent of housing permitted in unincorporated areas of the County. Siskiyou County is typically rural in land use and population and housing density, with a 2010 population in unincorporated areas of 24,285 (County of Siskiyou 2014). The Siskiyou County General Plan applies overlays that identify constraints to development rather than applying typical land use designations. The Siskiyou County zoning ordinance implements the policies of the general plan and places the site of the proposed substation and the area of the proposed ROW acquisition and surrounding lands in the Rural Residential Agricultural (RR) zoning district. The RR district allows rural residential uses mixed with commercial agricultural uses and allows for public utility uses with approval of a conditional use

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

permit (County of Siskiyou 2016). The proposed transmission line upgrade area is within an existing utility ROW within Siskiyou County and the City of Mount Shasta.

There are no relevant general plan policies related to population.

City of Mount Shasta General Plan and Zoning Ordinance

The City of Mount Shasta General Plan Housing Element provides an analysis of existing housing stock and housing needs for the 2014 to 2019 planning period and identifies policies to achieve specific housing objectives to meet the needs of the population residing in the City. The City's General Plan Land Use Map identifies land use designations that dictate the types of allowable land uses within each designation. The General Plan also applies land use designations to adjacent County lands that fall within the City's designated Planning Area. The City of Mount Shasta zoning ordinance implements the policies of the General Plan by identifying zones for which it identifies specific development standards.

There are no relevant general plan policies related to population.

5.13.3 Applicant Proposed Measures

No applicant proposed measures have been proposed for or apply to the analysis of impacts associated with population and housing.

5.13.4 Environmental Impacts and Mitigation

- a) *Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

Less Than Significant Impact. The proposed project would construct no new homes or businesses and would not directly induce permanent population growth in the project area. Construction of the proposed project would take approximately 6 to 12 months. Though the number of workers on site at any time would vary depending on individual construction tasks and project scheduling, it is estimated that on average 43 workers would be on site. It is estimated that approximately 50% of the workers would be from outside of the local area and would use existing temporary lodging in the surrounding community. Staffing requirements for operations and maintenance are expected to remain the same as the existing condition. A temporary and intermittent increase in population of up to 22 workers would not represent a substantial growth in population in the project area. Direct impacts associated with inducing population growth would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The proposed project also could indirectly induce population growth if it extends infrastructure to areas not served or facilitates increased capacity that could result in population growth in excess of community growth projections. The proposed project would replace and decommission an existing substation and upgrade the existing 69-kilovolt transmission line and distribution system that supplies power to the City of Mount Shasta. The proposed improvements are necessary to bring equipment and structures into compliance with current company, state and federal standards by replacing aging, obsolete, and non-standard equipment; to ensure reliability of the electrical supply to the area served by the Mount Shasta Substation; and to facilitate regional bulk transmission voltage stability and improve bulk power transfer across the region. Aging and non-standard equipment currently in use has resulted in ongoing maintenance issues, could negatively affect system reliability, and is a source of greenhouse gas emissions from sulfur hexafluoride (SF₆) breakers. The non-standard distribution line routing under I-5 was to be removed in 2005 in accordance with a conditional authorization from the California Department of Transportation (Caltrans). The proposed project would standardize routing of the distribution line crossing I-5 and bring it into compliance with Caltrans standards. The proposed project would provide for anticipated growth in power demand in the Mount Shasta service area, primarily due to the expected construction of a bottling plant, which is projected to use the remaining available power capacity on the existing system. The proposed project would also allow for removing local service areas from the regional bulk transmission systems and thereby eliminate constraints on the bulk transmission system resulting from voltage stability regulation when sharing transmission lines serving local service areas.

The proposed project would improve system reliability and accommodate increased load growth in the service area, which could accommodate additional development and population in the area served; however, growth in the study area is planned and regulated by applicable local planning and zoning ordinances. The proposed project would result in no change in zoning or land use in the project area, but would ensure system reliability and adequate system capacity to accommodate growth in the service area as envisioned by local planning policies and land use regulations. The proposed project would induce no growth in population beyond what is anticipated and allowable under existing adopted plans and land use regulations. Accordingly, the proposed project would not indirectly induce population growth and impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- b) *Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The proposed substation would be constructed on two vacant rural residential properties that are each developed with a vacant single-family dwelling and associated rural outbuildings. The housing unit vacancy rate in unincorporated Siskiyou County is 13.5% and the loss of two vacant rural residential dwellings would not substantially affect the availability of housing in the project area and would not necessitate the construction of replacement housing elsewhere. The loss of two single-family dwellings would result in **no impact** associated with displacement of existing housing.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

No Impact. As discussed in Section 5.13.4(b), the proposed project would remove two single-family dwellings to construct the proposed substation. Both of the residential units are unoccupied and no tenants or homeowners would be displaced by the proposed project. The proposed project would have **no impact** associated with the displacement of people or the construction of replacement housing.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

5.13.5 References Cited

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.14 Public Services

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| PUBLIC SERVICES – Would the project: | | | | |
| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: | | | | |
| Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.14.1 Environmental Setting

The proposed project is located in southern Siskiyou County (County). Portions of the project site are located in the unincorporated County and within the incorporated City of Mount Shasta. The proposed project would upgrade transmission lines within existing rights-of-way in the County and the City of Mount Shasta, and would remove and decommission an existing substation and replace it with a new substation. The proposed project would also include installing transmission lines within a new transmission line right-of-way of 50 feet by 300 feet. The existing and proposed substations and new right-of-way and transmission lines are in the unincorporated County.

Fire Protection and Emergency Medical Services

Based on California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone (FHSZ) mapping data, the project site is situated in areas classified as Moderate, Very High, and Non-Very High FHSZs. Within the City of Mount Shasta, the project site occurs primarily within Non-Very High FHSZs, with a small portion of existing overhead distribution line near North Mount Shasta Boulevard and Road No. 2M05 and an existing underground distribution line near Interstate 5 and West Lake Street occurring in a Very High FHSZ (CAL FIRE 2009). Within unincorporated Siskiyou County, the project site occurs primarily within a Very High FHSZ, with portions of the proposed project to the west and north of the City of Mount Shasta occurring within a Moderate FHSZ (CAL FIRE 2007) (see Figure 5.8-1 in Section 5.8, Hazards and Hazardous Materials). More recent efforts undertaken by the California Public Utilities Commission (CPUC), in coordination with CAL FIRE, attempt to map environmental

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

conditions associated with an elevated potential for utility-associated fires. On May 26, 2016, the CPUC adopted Fire Map 1 (Rulemaking 15-05-006), which identifies areas of the state where an elevated hazard for the ignition and rapid spread of powerline fires exists due to strong winds, abundant dry vegetation, and other environmental conditions (CPUC 2016). Fire Map 1 will be the foundation for development of Fire Map 2, which will delineate the boundaries of a new High Fire Threat District, where utility infrastructure and operations will be subject to stricter fire-safety regulations (CPUC 2016). Fire Map 2 has not yet been completed.

Fire protection services and emergency response in the project vicinity are provided within the City of Mount Shasta city limits by the Mount Shasta Fire Department and within the County by the Mount Shasta Fire Protection District and the Siskiyou Unit of CAL FIRE. The Mount Shasta Fire Department and the Fire Protection District maintain a mutual aid agreement with other fire protection agencies operating in the County, including the U.S. Forest Service and CAL FIRE, to provide fire response and to reduce fire threats in the community (City of Mount Shasta General Plan 2007a).

CAL FIRE

CAL FIRE is responsible for State Responsibility Areas and primarily fights wildland fires; CAL FIRE is not responsible for structural fires. The Siskiyou Unit serves the proposed project area and surrounding areas, and participates in a County-wide mutual aid agreement with all other fire agencies in the County. This unit is geographically divided into four battalions and consists of state- and County-paid stations, local government departments, fire protection districts, and numerous volunteer companies. CAL FIRE enforces California Public Resources Code 4290 for all of the State Responsibility Areas, since the County has no adopted County fire safety regulations. The Siskiyou Unit Strategic Fire Plan lists life, property, timber, grazing land, and watershed as assets at risk from wildfire in the County (CAL FIRE 2011). Refer to the expanded discussion of CAL FIRE responsibilities with respect to utility facilities provided in Section 5.8, Hazards and Hazardous Materials.

Police Protection

Police protection services and emergency response within the City of Mount Shasta are provided by the Mount Shasta Police Department. The Siskiyou County Sheriff's Department provides services to the unincorporated area surrounding the City of Mount Shasta, including the area of the proposed substation.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Schools

School districts serving the project area are the Mount Shasta Elementary School District and the Siskiyou Union High School District (City of Mount Shasta 2007b).

Parks

The project site is in proximity to many recreational opportunities afforded by public open space and recreational lands, including National Forests, State Parks, and local recreation areas. The Mount Shasta Parks and Recreation District operates recreation facilities and maintains recreation programs within the project area. Recreational facilities in the vicinity of the proposed project maintained by the Mount Shasta Parks and Recreation District include Mount Shasta City Park on Nixon Road, Shastice Park on Rockfellow Drive, and the Youth Sports Field off of North Washington Drive (MSRPD 2016).

Please refer to Section 5.15, Recreation, for further discussion of recreational facilities, including parks, in the vicinity of the project site.

5.14.2 Regulatory Setting

Federal

There are no relevant federal policies related to public services.

State

California Public Utilities Commission

CPUC regulates privately owned telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation companies in the state. CPUC is responsible for ensuring that California utility customers have safe, reliable utility service at reasonable rates; for protecting utility customers from fraud; and for promoting the health of California's economy. CPUC establishes service standards and safety rules, and authorizes utility rate changes. CPUC enforces CEQA compliance for utility construction.

Local

There are no relevant general plan or local plan policies related to public services.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.14.3 Applicant Proposed Measures

No applicant proposed measures have been identified that apply to the analysis of impacts associated with public services.

5.14.4 Environmental Impacts and Mitigation

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:*

Fire protection?

No Impact. Increases in long-term demand for fire protection services are typically associated with substantial increases in population. For the proposed project, staffing requirements for operations and maintenance would remain the same as the existing condition, and the project would not result in a permanent increase in population or introduce new uses to the area that would generate increased long-term demand for fire protection services.

Refer to Section 5.13, Population and Housing, for more information regarding potential increases in population that could result from the proposed project. See the discussion of fire hazards in Section 5.8, Hazards and Hazardous Materials, for more information related to fire codes applicable to utility projects, including Title 14, Section 1254 of the California Code of Regulations, and California Public Resources Code Section 4290 regulations, which identify minimum clearance requirements around utility poles and utility equipment. See also California Public Resources Code, Division 4, Chapter 6, which includes specific requirements related to controlling ignition sources; California Code of Regulations Title 14, Sections 1250–1258, Fire Prevention Standards for Electric Utilities, which includes fire prevention measures; CPUC General Order 95, which outlines maintenance and clearance requirements for safe operation or use of overhead lines; and General Order 165, which requires inspections of transmission facilities to ensure safe and high-quality electrical service. The facilities would continue to be maintained in accordance with fire-safe standards and regulations applicable to electrical transmission lines and facilities. Therefore, no impact would result from construction of new facilities to meet an increased long-term demand for fire protection services as a result of implementing the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

As discussed in Section 5.13, Population and Housing, construction of the proposed project would take approximately 6 to 12 months. It is estimated that construction activities would add approximately 22 people (construction staff) to the local population during peak periods. A temporary and intermittent increase in population of up to 22 workers would not represent a substantial growth in population in the project area, and would not require the construction of new facilities to meet an increased short-term demand for fire protection services. See also the discussion of fire-safe measures during construction, and Mitigation Measure (MM) HAZ-2, which requires a fire plan for the project to be developed in consultation with local and state fire agencies. Implementation of these fire-safe measures during construction would ensure that temporary construction activities would result in no need for new facilities to accommodate a short-term increase in demand for fire response during construction; therefore, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Police protection?

No Impact. Increases in the demand for police protection services are typically associated with substantial increases in population. The proposed project would result in no change in long-term maintenance or operations staffing needs that could result in a long-term increase in population in the project area, and would result in no change in land use in the project area that could generate increased long-term demand for police protection services. Refer to Section 5.13, Population and Housing, for more information related to potential long- and short-term population increases associated with the proposed project. Construction activities would last approximately 6 to 12 months. It is estimated that construction activities would add approximately 22 people (construction staff) to the local population during peak periods. A temporary and intermittent increase in population of up to 22 workers would not represent a substantial growth in population in the project area, and would not require construction of new facilities to meet an increased short-term demand for police protection; therefore, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Schools?

No Impact. Increased demand for public school services are typically associated with increases in the local population or demand for housing. The proposed project would result in no change in long-term maintenance or operations staffing needs that could result in a long-term increase in population in the project area. Construction activities

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

would last approximately 6 to 12 months. It is estimated that construction activities would intermittently add approximately 22 people (construction staff) to the local population during peak periods. Construction staff from out of the area on short work assignments would result in no change in the demand for public school facilities, and no new facilities would be required as a result of the implementing the proposed project; therefore, **no impact** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Parks?

Less Than Significant Impact. For potential impacts on recreational facilities, including parks, see Section 5.15, Recreation. Impacts on recreational facilities would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

Other public facilities?

No Impact. The proposed project would not result in substantial adverse impacts related to other types of public facilities (e.g., public libraries, hospitals, or other civic uses) because, as discussed previously, the proposed project would not result in a significant increase in the local population or housing, which is typically associated with increased demand for public facilities. Short-term construction activities would require up to 22 non-local construction workers per day. Operation and maintenance activities would consist of periodic (typically annually) inspection and minor repairs by existing employees. Therefore, the proposed project would not have an effect on the ability of other public services to maintain their service levels, and would have **no impact** associated with the provision of new or physically altered facilities for libraries, hospitals, or other civic uses.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.15 Recreation

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| RECREATION – Would the project: | | | | |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.15.1 Environmental Setting

The City of Mount Shasta (City) and Siskiyou County (County) are within an area of diverse and scattered recreational opportunities within undeveloped areas on public lands including the Shasta–Trinity National Forest and Klamath National Forest. These areas provide opportunities for many passive recreational activities, including camping, hiking, mountaineering, fishing, and other outdoor-oriented recreation.

The Mount Shasta Recreation and Parks District maintains a variety of recreation facilities within the City of Mount Shasta and manages recreation programming for the population within the Recreation and Parks District’s boundaries. Primary facilities maintained by the Recreation and Parks District within the project area include the Mount Shasta City Park on Nixon Road, Shastice Park on Rockfellow Drive, and the Youth Sports Field on North Washington Drive.

No established recreational facilities or City or County parks are within the project area. The Line 2 distribution lines are within existing utility rights-of-way and no recreational facilities exist on or adjacent to the proposed substation site and associated new right-of-way area.

5.15.2 Regulatory Setting

Federal and State

There are no federal or state policies relevant to the analysis of impacts of the proposed project on recreation resources.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Local

There are no City or County policies relevant to the analysis of the proposed project's impact on recreation.

5.15.3 Applicant Proposed Measures

No applicant proposed measures have been proposed for or apply to recreation resources.

5.15.4 Environmental Impacts and Mitigation

- a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

Less Than Significant Impact. The proposed project is anticipated to begin construction in the winter of 2016 and require up to 12 months to complete. Disturbed areas would be restored and monitoring of some areas for restoration success would be conducted as required by terms and conditions of applicable permits and project commitments. Construction of the proposed substation would take an estimated 43 workers approximately 6 to 12 months to complete. It is estimated that approximately 50% of the workforce would be made up of people from local communities. Therefore, it is expected that the proposed project would result in approximately 22 additional people in the project area for the duration of project construction. Following project construction, workers would intermittently be on site to monitor restoration and for operations and maintenance purposes. Operations and maintenance activities are anticipated to be similar to the existing condition and would result in no increase in population in the area or use of existing recreation facilities. The temporary increase in use of recreational facilities that could result from 22 workers over the anticipated 12-month construction period is expected to result in no substantial physical degradation of existing recreational facilities in the City of Mount Shasta or Siskiyou County. Impacts to recreational facilities would be **less than significant**.

Significance After Mitigation: Mitigation is not required because impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The proposed project does not include construction of new recreational facilities. The project would result in no permanent increase in demand for recreational facilities that would require construction or expansion of recreational facilities; therefore, **no impact** would occur.

Significance After Mitigation: Mitigation is not required because **no impact** would occur.

5.15.5 References Cited

No references were cited in this section.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.16 Transportation and Traffic

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|---|-------------------------------------|-------------------------------------|
| TRANSPORTATION/TRAFFIC – Would the project: | | | | |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

5.16.1 Environmental Setting

The following includes a description of the roadways that would be used for the proposed project. This includes those roads that would be used to transport materials to the site and those that may be affected by construction activities associated with the proposed project.

The project site is located near the City of Mount Shasta (City), in Siskiyou County. The proposed project would be located in a rural residential area to the southwest of the City. The proposed location for the substation is adjacent to the existing Mount Shasta Substation on Old Stage Coach Road, approximately 1,000 feet west of Interstate 5 (I-5). Transmission and

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

distribution system upgrades would occur both within the City and in rural open space to the west and north of the City and in unincorporated Siskiyou County.

The proposed project would involve demolition of the existing substation, construction of the Lassen Substation, and installation of steel poles to carry a new conductor in the ~~predominately~~ predominantly rural residential area to the west of I-5 on the border of the City. Construction activities would include the movement and transportation of project materials and construction crews throughout the project area. It would require the suspension of normal roadway function for construction of some elements, including replacing poles along Old Stage Coach Road and upgrading distribution lines and placing pole tops within the boundaries of the City.

Regional Roadways

The proposed project site is within 0.5 miles of I-5. The regional system consists of I-5, U.S. Route 97, and State Route 89, which ~~that~~ link the cities of Dunsmuir, Mount Shasta, and Weed. The primary route for the supply of materials to the project site would be I-5. I-5 runs north/south through California from the Mexican border to the Oregon border. I-5 has limited access in the area, and the nearest interchange is the Mount Shasta/West Lake Street interchange, approximately 1,900 feet north of the project site. Traffic volume data along I-5 in the project area are provided in Table 5.16-1.

Table 5.16-1
Existing Traffic Volumes in the Project Area along Interstate 5

| Milepost | Description | Back Peak Hour | Back Peak Month | Back AADT | Ahead Peak Hour) | Ahead Peak Month | Ahead AADT |
|----------|---------------------------|----------------|-----------------|-----------|------------------|------------------|------------|
| 8.475 | Junction SR-89 East | 3,000 | 23,600 | 19,600 | 2,850 | 23,100 | 19,600 |
| 10.485 | Mount Shasta, Lake Street | 2,850 | 23,100 | 19,600 | 2,300 | 26,500 | 20,000 |
| 12.062 | North Mount Shasta | 2,300 | 26,500 | 20,000 | 2,550 | 29,000 | 22,900 |

Source: Caltrans 2009.

Notes: AADT = Annual Average Daily Traffic; SR = State Route.

Local Roadways

Local roadways are in the purview of Siskiyou County. The following local roadways would be used to either access the project site or otherwise be affected by construction and operation activities: North Old Stage Road, South Old Stage Road, Fish Hatchery Lane, West Lake Street,

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

North Mount Shasta Boulevard, South Mount Shasta Boulevard, and West Ream Avenue. Roads in the area of the substation carry very low volumes of traffic (PacifiCorp 2015).

Roads within the City would be affected by construction activities such as reconductoring of existing distribution lines and placing poletop transformers. Affected roads would be West Jessie Street, Ski Village Drive, CGWC Drive, North Mount Shasta Boulevard, South Mount Shasta Boulevard, Kingston Road, Mill Street, and Chestnut Street.

Bicycle and Pedestrian Transportation

Bikeways and Trails

The City of Mount Shasta Bicycle, Pedestrian, and Trails Master Plan 2009 divides bikeways into three classes: bike paths (Class I), bicycle lanes (Class II), and bicycle routes (Class III). Bike paths are distinctly separate from the flow of motorized traffic and are routes from which motorized traffic is precluded; bicycle lanes are dedicated lanes designated by lane striping, pavement legends, and signs in roadways; bicycle routes are routes for bicycle use that are shared with motorized traffic (City of Mount Shasta 2009).

Within the proposed project vicinity, the following are proposed as Class II bicycle lanes: North and South Mount Shasta Boulevard from Spring Hill Avenue south to the City limits, along Ream Avenue from South Mount Shasta Boulevard to the City limits, and along West Lake Street from Hatchery Lane east to the City limits. Mill Street and Chestnut Street are designated as Class III bike routes.

Fixed Bus Routes

Fixed-route bus services that serve the City are provided by Siskiyou Transit and General Express. North- and south-bound weekday services are provided. Bus stops within the City are at the Mount Shasta Shopping Center, Mercy Medical Center, and three locations along East Ivy Street and Rockfellow Drive. No scheduled stops are located in the immediate project site, west of I-5.

Freight/Passenger Rail Service

The Union Pacific Railroad and McCloud Railway Company provide freight rail services. The Union Pacific Railroad line, which runs the length of California, runs through the City. The McCloud Railway Company runs approximately two trains per week on a single line that connects the community of McCloud with the Union Pacific Railroad line.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Amtrak provides passenger service through Mount Shasta each day on the Union Pacific Railroad line. In addition, Amtrak Thruway Motorcoach service connects Amtrak train stations with locations not served by railways. Amtrak maintains a Thruway Motorcoach bus station in the City on West Lake Street approximately 0.2 miles east of I-5. This station is an unstaffed bus stop that serves the Thruway Motorcoach route between Sacramento, California, and Medford, Oregon (Amtrak 2011).

Airports

The nearest airport to the project site is the Dunsmuir Municipal–Mott Airport, which is a public airport owned and managed by the City of Dunsmuir. The airport consists of a single 2,700- by 60-foot asphalt runway that runs parallel to I-5 approximately 4 miles from the project site. The relevant Airport Land Use Compatibility Plan includes the Dunsmuir Municipal–Mott Airport. The nearest commercial service airports are located in Redding, California, and Medford, Oregon. A heliport site is located at the Mercy Medical Center of Mount Shasta (914 Pine Street) within the City.

5.16.2 Regulatory Setting

State

The California Department of Transportation (Caltrans) manages interregional transportation, including management of construction activities within or above state roadways. Caltrans is also responsible for permitting and regulating the use of state roadways. The only road Caltrans has responsibility for in the project area is I-5. I-5 would be used for regional and local access to the proposed project site.

Caltrans requires permits be obtained for transportation of oversized loads and transportation of certain materials, and for construction-related traffic disturbances (California Vehicle Code Division 15). Caltrans regulations would apply to the transportation of oversized loads on I-5 associated with the construction of the proposed project. Further, Caltrans' Construction Manual requires temporary traffic control planning "during any time the normal function of a roadway is suspended" (Caltrans 2001). Prior to project construction, Caltrans would require PacifiCorp to obtain all necessary transportation and encroachment permits in accordance with the Caltrans Transportation Permit Manual and Encroachment Permit Manual. Conditions of such permits would require the proposed project to incorporate best management practices (BMPs) to minimize impacts to traffic and transportation.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Local

Siskiyou County

Local roads within the project area are under the jurisdiction of Siskiyou County. Local roads used during construction and maintenance of the project may include North Old Stage Road, South Old Stage Road, Fish Hatchery Lane, Lake Street, and West Ream Avenue. Siskiyou County policies and regulations regarding the design and use of roadways are detailed in the Land Use and Circulation Element of the Siskiyou County General Plan.

For any construction activities that would impede the normal flow of traffic or require closure of parts of the roadway, Siskiyou County requires an encroachment permit for any impediment to travel on highways over which Siskiyou County has jurisdiction, and requires a transportation permit to carry extralegal loads on Siskiyou County roadways. As such, encroachment and extralegal load permits would be required prior to beginning project construction (County of Siskiyou 1980).

City of Mount Shasta

The City outlines local policies and regulations regarding the design and use of roadways within City limits in the Circulation Element of the City of Mount Shasta General Plan (City of Mount Shasta 2007). In addition, the City has a Bicycle, Pedestrian, and Trails Master Plan that provides for a City-wide network of bicycle paths, lanes, and routes, along with bicycle- and pedestrian-related programs and support facilities (City of Mount Shasta 2009). The proposed substation site is located in unincorporated Siskiyou County, but some components of the upgraded distribution system would be within the City boundary.

5.16.3 Applicant Proposed Measures

The proposed project would integrate the following applicant proposed measure (APM) into design and implementation:

APM-TT-1 Traffic Management Plan. Prior to the start of construction, PacifiCorp shall prepare a Traffic Management Plan. The Plan would define the use of flag persons, warning signs, lights, barricades, cones, etc. to control construction traffic. The Plan would include but not be limited to the following:

- All property owners and residents of streets affected by construction shall be notified prior to the start of construction. Advance public notification shall include postings of notices and appropriate signage of construction activity. Access to all residences and properties near the project shall be maintained at all times.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- All construction activities shall be coordinated with local law enforcement and fire protection agencies. Emergency service providers shall be notified of the timing, location, and duration of construction activities.
- Road use-related wear and tear shall be documented during construction of transmission line facilities and PacifiCorp shall repair any damaged roadway sections, as applicable.

5.16.4 Environmental Impacts and Mitigation

- a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

Construction Impacts

Less Than Significant Impact. The proposed project would generate new traffic during the 41 weeks of construction activities over a 12-month period. Daily vehicle trips would be generated by the arrival and departure of construction workers, and heavy-truck trips for hauling equipment and materials to and from the construction site. PacifiCorp estimates an average of 14 commuting construction personnel working on a given day (PacifiCorp 2015). It is anticipated that personnel would commute in their own vehicles, generating 28 trips per day.

Heavy-vehicle trips would increase to deliver construction materials. Construction activities would include hauling oversized loads, including poles, conductor spools, substation hardware, and other types of equipment. Trips would primarily be to the substation site, as this site is the location of most of the construction activities and the location of the temporary storage yard. However, equipment and materials would be delivered to locations throughout the project site. Delivery and movement of vehicles would be dispersed throughout the day.

Construction activities would last no longer than 12 months, and any increased traffic would be dispersed across the project site and throughout the day. Therefore, any degradation in level of service at a given location is likely to be temporary, resulting in no long-term degradation of traffic service at key interchanges. Impacts would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Operational Impacts

No Impact. The existing Mount Shasta Substation is an unattended and remotely operated substation. Traffic associated with the existing substation consists of annual or biannual inspections and ad hoc maintenance activities that occur because of unusual events such as storm damage, vandalism, or equipment failure. Other traffic associated with existing transmission and distribution lines include for vegetation management such as control of noxious weeds and the periodic trimming of shrubs or trees to reduce fire fuel in the transmission/distribution line easements. The proposed project would operate under the same management regime with similar frequencies of inspection and management activities. As such, the proposed project would introduce no new traffic load to the project area that would result in change to the existing traffic load. Consequently, there would **no impact** to traffic related to operational activities.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Less Than Significant Impact. See discussion in Section 5.16.4(a). Impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- c) *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

No Impact. The proposed project would not change air traffic patterns nor would it require the use of helicopters or other aircraft; therefore, implementation of the project would result in **no impacts**.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- d) *Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

No Impact. The proposed project would not change the configuration (alignment) of area roadways, would not result in construction activities within a public road right-of-way, and would not introduce types of vehicles that are not already traveling on area roads; therefore, **no impacts** would occur.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- e) *Would the project result in inadequate emergency access?*

Less Than Significant Impact. As discussed in Section 5.16.4(a), construction activities would occur throughout the project site, but would be predominantly concentrated at the proposed substation site on Old Stage Coach Road. Where activities cross or occur within existing roadways, there is a potential to block or otherwise hinder emergency service access. Implementation of APM-TT-1 would require prior coordination with emergency services to ensure access strategies for any affected locations during construction. Therefore, the proposed project would not restrict emergency access without a prior plan, and impacts would be **less than significant**.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

- f) *Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

Less Than Significant Impact. The proposed substation site is in unincorporated Siskiyou County and outside the jurisdiction of the City. No trails or associated signage occur within or near the proposed substation site or any section of the 69-kilovolt line to be reconductored. Conflicts with existing bike plans would be confined to temporary construction activities within the Class III bike routes on Mill Street and Chestnut Street. Reconductoring and pole transformer placement on existing lines would require temporary traffic control in these locations. Construction activities may temporarily impede the normal flow of traffic along these routes. However, construction activities would be for no more than a few days in each location and would not result in a long-term decrease in the performance of these Class III bike routes. As such, any impact would be limited and temporary, and would be **less than significant**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.17 Utilities and Service Systems

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|-------------------------------------|-------------------------------------|
| UTILITIES AND SERVICE SYSTEMS – Would the project: | | | | |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

5.17.1 Environmental Setting

Under the proposed project, the proposed upgrades to the existing 69-kilovolt transmission line and the distribution lines would occur within an existing utility or public road right-of-way (ROW). The existing substation and proposed site for the new substation are within an area characterized by rural residential development. Portions of the project occur within the City of Mount Shasta (City) and unincorporated Siskiyou County (County).

Wastewater disposal in the general area is accommodated by rural on-site septic systems or connected to a community sewer system operated and maintained by the City of Mount Shasta. Wastewater is piped to the Mount Shasta Wastewater Treatment Plant (WWTP), which is owned and operated by the City and provides service to the City and adjacent areas (City of Mount Shasta 2016a). The plant treats wastewater and discharges the treated wastewater to the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Sacramento River during the non-recreation season and to a reclamation leach field or to the Mount Shasta Golf Course for irrigation use if conditions allow (City of Mount Shasta 2016a). The Mount Shasta WWTP has a design capacity of about 0.75 million gallons per day (MGD) for dry weather and a peak wet weather design capacity of approximately 2.8 MGD (Pace Engineering 2014). As of 2014, the Mount Shasta WWTP was operating at a dry-weather flow of approximately 0.67 MGD and wet-weather flow of 1.83 MGD.

The proposed Lassen Substation site is composed of two vacant rural residential parcels. The former residence at 504 South Old Stage Road is connected to an on-site septic system and leach line, and the former residence at 506 South Old Stage Road is connected to the public sewer system. Refuse collection service is not currently provided to the property, but is available through Black Butte Transfer Station (Dump) and/or John Smith Sanitation (collection service) (City of Mount Shasta 2016b). No municipal water is connected to either property; the properties both relied on private well water (Enplan 2015). Electric service is provided by PacifiCorp. No sumps, hoists, hydraulic lifts, storm drains, basements, or elevators were observed on the property (Enplan 2015).

The existing power-line ROW and substation are not served by any existing sewer or septic system because they generate no wastewater.

5.17.2 Regulatory Setting

Federal

There are no federal policies applicable to the analysis of impacts associated with utilities or service systems for the proposed project.

State

Protection of Underground Infrastructure

California Government Code, Section 4216 et seq., requires an excavator to contact a regional notification center (e.g., Underground Service Alert (USA), or DigAlert) at least 2 days prior to excavation of any subsurface installations. Any utility provider seeking to begin a project that could damage underground infrastructure can call DigAlert, the regional notification center for Southern California. DigAlert will notify the utilities that may have buried lines within 1,000 feet of the project. Representatives of the utilities, once notified, are required to mark the specific locations of their facilities within the work area prior to the start of project activities.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

State Agency Model Integrated Waste Management Act of 1999

Assembly Bill 75 was passed in 1999, and the State Agency Model Integrated Waste Management Act (Chapter 764, Statutes of 1999, Strom-Martin) took effect on January 1, 2000. The State Agency Model Integrated Waste Management Act mandated that state agencies develop and implement an integrated waste management plan. The act also mandated that community service districts providing solid waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is located. Provisions of the act require all state agencies and large state facilities to divert at least 50% of solid waste from landfills after 2004 and that each state agency and large facility submit an annual report to the California Department of Resources Recycling and Recovery summarizing its yearly progress in implementing waste diversion programs.

California Public Utilities Commission General Order 95

The applicant is required to comply with California Public Utilities Commission General Order 95, which institutes requirements for overhead line design, construction, and maintenance (CPUC 2012). The order specifies requirements for joint-use poles, including clearances, inspection schedules, and coordination requirements intended to minimize conflicts among utility supply lines and telecommunications facilities.

Local

There are no general plan policies relevant to the analysis of the proposed project's impacts associated with the provision of appropriate utilities or service systems.

5.17.3 Applicant Proposed Measures

No applicant proposed measures (APMs) have been proposed for or apply to utilities and service systems.

5.17.4 Environmental Impacts and Mitigation

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The proposed project includes electrical utility upgrades and would result in no permanent increase in population that would generate additional wastewater with potential to exceed the capacity of existing wastewater treatment facilities or cause existing facilities to exceed wastewater treatment standards. Portable toilets would be

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

used for the 12-month construction period and one on-site portable toilet would be located in the proposed substation for use by maintenance and operations staff. Portable toilets would be maintained and serviced by an outside contractor, who would dispose of effluent in accordance with applicable regulations for wastewater disposal.

The project does not involve sanitary wastewater discharges; therefore, wastewater treatment requirements of the Regional Water Quality Control Board are not applicable. Discussion of treatment requirements for construction dewatering discharge and stormwater runoff can be found in Section 5.9, Hydrology and Water Quality. Implementation of the proposed project would have **no impact** relating to exceedance of wastewater treatment requirements.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

No Impact. The proposed project would generate no permanent change in water demand or wastewater generation that could result in a need for new or expanded facilities and would result in no construction of new facilities. The project would require an estimated 43 workers for approximately 12 months. It is estimated that 50% of these workers would be from the local area. The non-local workforce would stay at existing hotels in the vicinity of the project site and no new facilities would be required to provide adequate water and wastewater facilities to serve the temporary workforce.

It is estimated that less than 100 gallons of water per day would be needed for dust suppression and compaction during the 12-month construction period and for irrigation to reestablish vegetation in disturbed areas after construction is complete. The increased demand for water would be met commercially (e.g., bottled water) or by using a nearby authorized municipal source to fill up water trucks. These water needs would not require additional treatment capacity or new treatment facilities, because the demand would be minimal and temporary during and after construction.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- c) *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

No Impact. The stormwater pollution prevention plan (SWPPP) (APM-WQ-1) prepared for the proposed project would identify appropriate best management practices (BMPs) to implement during and after construction to ensure that stormwater is adequately controlled in the project area and that stormwater from limited areas of new impervious surfaces, such as concrete foundations for new power poles, would not increase stormwater runoff to existing stormwater facilities.

The proposed new substation is designed to control stormwater runoff in accordance with the grading plan that would be approved through Siskiyou County and BMPs specified in the SWPPP and site plan. The new substation would be surfaced with gravel to provide for on-site infiltration of stormwater and would be graded to maintain natural surface drainage patterns. The site of the existing substation would be restored in accordance with the approved grading plan and BMPs included in the SWPPP. Any new stormwater drainage facilities constructed to serve the proposed Lassen Substation site would be minor facilities (e.g., gravel pads, drainage swales, velocity dissipation devices), and are included in the analysis of overall footprint impacts of the project. Discussion of stormwater quality BMPs (both permanent and temporary) can be found in Section 5.9, Hydrology and Water Quality. Implementation of the proposed project would have **no impact** on stormwater drainage facilities.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

No Impact. The proposed project would generate no permanent change in water demand that could result in a need for new or expanded water entitlements. The project would require an estimated 43 workers for approximately 12 months. It is estimated that 50% of these workers would be from the local area. The non-local workforce would stay at existing hotels in the vicinity of the project that are served by existing water service from existing entitlements.

Limited water would be needed for dust suppression during the 12-month construction period and for irrigation to reestablish vegetation in disturbed areas after construction is complete. The temporary increased demand for water would be sourced from existing

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

service hookups served from existing entitlements and would not require new or expanded entitlements. Implementation of the proposed project would have **no impact** on water supplies.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- e) *Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

No Impact. See the discussion in Section 5.17.4(a). The proposed project includes electrical utility upgrades and would result in no permanent increase in population that would generate additional wastewater with potential to exceed the capacity of existing wastewater treatment facilities or cause existing facilities to exceed wastewater treatment standards. Portable toilets would be used for the 12-month construction period and one on-site portable toilet would be located in the proposed substation for use by maintenance and operations staff. Portable toilets would be maintained and effluent would be pumped and disposed of at existing facilities in accordance with applicable regulations for wastewater disposal. **No impact** would occur on wastewater treatment capacity as a result of implementation of the proposed project.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

Less Than Significant Impact. All forms of refuse and waste produced along the ROW during construction would be collected and disposed of in a designated landfill or appropriate waste disposal site. Refuse and waste are defined as any discarded material, trash, garbage, packing material, containers, waste petroleum products, broken equipment, used parts, or excess construction materials (PacifiCorp 2015). All remaining subtransmission, distribution, and telecommunication lines that are not reused by PacifiCorp would be removed and delivered to a suitable facility for recycling. Any wood poles not reused by PacifiCorp would be checked for the presence of wood preservatives (creosote, pentachlorophenol or other wood preservative), and would be disposed of in an appropriately permitted disposal facility such as a Class I hazardous waste landfill or in a lined portion of an RWQCB-certified municipal landfill (PacifiCorp 2015).

Demolition activities for the proposed project (which includes demolition of existing residences and the existing Mount Shasta Substation) are likely to produce substantial

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

quantities of debris that would need to be disposed of. State regulations (i.e., Integrated Waste Management Act) require diversion (i.e., recycling/reuse) of at least 50% of construction and demolition (C&D) debris, which John Smith Sanitation (or other hauler contracted by PacifiCorp) would accommodate as the franchise hauler in the City. This C&D requirement would substantially reduce solid waste associated with the proposed project's C&D activities. The remaining construction material would be disposed of at a solid waste facility with available capacity. The Black Butte Transfer Station is listed as accepting C&D waste and would transfer it to regional recycling or disposal facilities (CalRecycle 2016a). It has a permitted throughput of 100 tons/day. According to a landfill capacity analysis, the County has an annual capacity of 300,000,000 tons, a current managed disposal amount of 900,000 tons, projected to be approximately 1,100,000 tons by 2025, assuming a medium growth rate projection for the region (CalRecycle 2016b). Therefore, the County has adequate landfill capacity to accommodate regional waste disposal needs through 2025.

In the operational condition, the proposed project would intermittently generate nominal quantities of solid waste associated with normal maintenance activities and would result in little to no change in the existing condition.

All solid waste generated during construction would be collected and hauled to an approved facility with permitted capacity to accept waste material. As indicated above, there is sufficient capacity; therefore, the project would have a **less than significant** impact on landfill capacity.

Significance After Mitigation: No mitigation is required because impacts would be **less than significant**.

g) *Would the project comply with federal, state, and local statutes and regulations related to solid waste?*

No Impact. See the discussion in Section 5.17.4(f). All solid waste generated by the proposed project during and following construction would be handled in accordance with federal, state, and local statutes and regulations and hauled to an approved solid waste facility with permitted capacity to accept the waste materials. Implementation of the proposed project would have **no impact** regarding solid waste statutes and regulations.

Significance After Mitigation: No mitigation is required because **no impact** would occur.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.17.5 References Cited

- CalRecycle (California Department of Resources Recycling and Recovery). 2016a. "Facility/Site Summary Details: Black Butte Transfer Station (MVTs) (47-AA-0056)." Accessed September 2, 2016. <http://www.calrecycle.ca.gov/SWFacilities/Directory/47-AA-0056/>.
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- CPUC (California Public Utilities Commission). 2012. General Order 95: Overhead Electric Line Construction.
- City of Mount Shasta. 2016a. "Wastewater Treatment Plant." City of Mount Shasta website. Accessed August 29, 2016. <http://mtshastaca.gov/public-works/wtp/>.
- City of Mount Shasta. 2016b. "Black Butte Transfer Station (Dump) and John Smith Sanitation." City of Mount Shasta website. Accessed August 30, 2016. <http://mtshastaca.gov/resources/trash-pickup/>.
- Enplan. 2015. *Phase I Environmental Site Assessment, Lassen Substation Project, Siskiyou County, California*. Prepared for Power Engineers. July 20, 2015.
- PACE Engineering. 2014. Draft Preliminary Engineering Report and Feasibility Study for City of Mt. Shasta State Mandated Wastewater Treatment and Disposal Improvement Project. Job No. 111.44. Accessed August 29, 2016. <http://mtshastaca.gov/wp/wp-content/uploads/2015/11/PER-WWTP.pdf>.
- PacifiCorp. 2015. *Proponent's Environmental Assessment for the Application of PacifiCorp (U 901 E) for a Permit to Construct the Lassen Substation Project*. Prepared by Power Engineers Inc. October 2015.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

5.18 Mandatory Findings of Significance

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|---|------------------------------------|--------------------------|
| MANDATORY FINDINGS OF SIGNIFICANCE | | | | |
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

5.18.1 Environmental Impacts and Mitigation

- a) *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

Less Than Significant Impact with Mitigation Incorporated. The project could result in impacts to special status plant and wildlife species. With implementation of APM-BIO-1 through APM-BIO-10 and MM-BIO-1, as described in Section 5.4.4, Biological Resources, impacts would be reduced to less than significant.

As described in Section 5.5, Cultural Resources, the proposed project would not have an adverse effect on known cultural archaeological or paleontological resources. Should unanticipated human remains be discovered during ground-disturbing activities, project personnel would implement California Health and Safety Code Section 7050.5 and

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California Public Resource Code Section 5097.98. With implementation of current applicable legal regulatory framework, the project would not eliminate important examples of major periods of California history or prehistory.

Operation of the proposed project would be similar to current operation activities associated with the existing Mount Shasta Substation. Therefore, there would be no incremental change in environmental impacts associated with the new substation, and no operational impacts.

Therefore, the proposed project does not have the potential to substantially reduce the habitat of fish or wildlife species, reduce the number or restrict the range of a rare or endangered plant or animal, or cause a fish or wildlife population to drop below self-sustaining levels or threaten to eliminate a plant or animal community or eliminate important examples of the major periods of California history or prehistory. Impacts from implementation of the proposed project would be **less than significant with mitigation incorporated**.

Significance After Mitigation: With implementation of MM-BIO-1, impacts from the proposed project would be **less than significant with mitigation incorporated**.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

Less Than Significant Impact with Mitigation Incorporated. The proposed project does not have impacts that are individually limited but cumulatively considerable. The California Environmental Quality Act (CEQA) Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project’s incremental contribution to a significant cumulative effect is “cumulatively considerable,” meaning that the project’s incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects (14 CCR 15000 et seq.). An incremental, project-specific contribution to a cumulative impact is less than cumulatively considerable, and thus is not significant, if, for example, the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. The cumulative impacts discussion does not need to provide as much detail as is provided in the analysis of project-only impacts and should be guided by the standards of practicality and reasonableness.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

CEQA Guidelines Section 15130(b) identifies the following three elements as necessary for an adequate cumulative analysis:

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the Lead Agency; or a summary of projections contained in an adopted General Plan or related planning document designed to evaluate regional or area-wide conditions.
- A summary of expected environmental effects to be produced by those projects. The summary shall include specific reference to additional information stating where that information is available.
- A reasonable analysis of the cumulative impacts of the relevant projects and an examination of reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project (14 CCR 15130(b)).

This section analyzes the cumulative impact of construction, operation, and maintenance of the proposed project, taking into account the effects in common with other past, present, and reasonably anticipated future projects. Past projects include completed projects whose long-term effects are closely related either in time or space (i.e., temporally or in geographic proximity) to the effects of the proposed project. Present projects are those being constructed, installed, or implemented concurrently with the preparation of this environmental document. Reasonably anticipated future projects include those for which there are existing decisions, funding, formal proposals, or that are highly probable, based on known opportunities or trends. To determine the extent of the cumulative scenario for the proposed project, the California Public Utilities Commission contacted Siskiyou County (Walker, pers. comm. 2016), the City of Mount Shasta (Lucchesi, pers. comm. 2016), and the California Department of Transportation (Caltrans; Quiney, pers. comm. 2016) for information on present or reasonably anticipated future projects within their respective jurisdictions in proximity to the proposed project.

The proposed project would replace the existing Mount Shasta Substation with the updated Lassen Substation. As such, it is anticipated that operational impacts of the proposed substation would not be differ from the existing substation. Therefore, the proposed project introduces no new long-term impacts to the project area. Any impacts caused by the proposed project would be would be related to construction activities.

As discussed in Sections 5.1 through 5.17, many of the potential impacts of the proposed project would occur during construction, with no new operational effects. Because the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

construction-related impacts of the proposed project would be temporary and localized, they would have the potential to combine with similar impacts of other projects only if they occur at the same time and in close proximity. Construction impacts, mostly relating to air quality, hazards and hazardous materials, and hydrology and water quality, may combine with similar effects of other projects in the vicinity to create a cumulative considerable impact.

Table 5.18-1 presents foreseeable projects in the vicinity that could combine with the proposed project, resulting in cumulative impacts. The potential cumulatively considerable impacts of the proposed project in relation to these nearby projects are discussed in Table 5.18-2. Combined impacts from the proposed project and past, present, and reasonably foreseeable projects would be **less than significant with mitigation incorporated**.

Significance After Mitigation: Impacts would be **less than significant with mitigation incorporated**.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 5.18-1
Foreseeable Projects in the Vicinity of the Proposed Project**

| Project Name, Location, Responsible Agency | Project Description | Status |
|--|---|--|
| Crystal Geyser Bottling Plant 210 Ski Village Drive, Mount Shasta, California 96067 Siskiyou County | The proposed project to be evaluated in the EIR consists of the operation of the existing Crystal Geyser Bottling Plant as a bottling facility, with the addition of several proposed components and utility/infrastructure options. The proposed addition of an on-site permanent caretaker/security residence requires a conditional use permit from the County, which triggers the need for compliance with CEQA. The EIR will analyze all plant modifications undertaken and proposed by the applicant to resume operation of the plant. | NOP issued June 24, 2016; estimated Final EIR – Q1 2017. Construction schedule unknown. |
| Mount Shasta Wastewater Treatment Plant upgrades (a.k.a. Mount Shasta Sewer Line Project) Grant Road City of Mount Shasta | The proposed project entails improvements to the Mount Shasta Wastewater Treatment Plant and Sacramento River Outfall. These improvements are necessary to comply with Central Valley Regional Water Quality Control Board requirements for wastewater discharge. The proposed improvements would be located within the footprint of the existing facilities and would include a replacement treatment plant and a new diffuser at the river outfall. The project site is not identified as a hazardous waste facility, hazardous waste property, or hazardous waste disposal site. The +10-acre project site is located at the southern terminus of Grant Road, southeast of the Mount Shasta Resort Golf Course, just south of the City of Mount Shasta, Siskiyou County, California. | Issuance and adoption of a MND, with the NOD issued May 16, 2016. Construction schedule unknown. |
| Dunsmuir Interstate 5 Roadway Rehabilitation Project Caltrans | Rehabilitation and construction would extend from milepost 2.7 to R11.4. The Lake Street undercrossing is about milepost R10.5. The project would likely occur during 2017 and possibly 2018. | Construction anticipated 2017–2018. |
| Black Butte Roadway Rehabilitation Project Caltrans | Black Butte Roadway Rehabilitation of overhead on I-5, approximately milepost 15.3 to 16.5; replacement. | Construction anticipated 2018. |

Notes: EIR = environmental impact report; NOP = Notice of Preparation; MND = mitigated negative declaration; NOD = Notice of Determination.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 5.18-2
Analysis of Potential Cumulatively Considerable Impacts

| | |
|--|--|
| Aesthetics | The proposed project would introduce no significant new elements to aesthetics resources within the project area and would have no significant impact on aesthetics resources. The projects listed in Table 5.18-1 either do not share the same environmental setting or do not introduce any new elements to a shared setting. Consequently, the combined effects would not result in a cumulatively considerable impact to aesthetic resources. |
| Agriculture and Forestry | Individually, the proposed project would result in no impacts to agricultural lands or Farmland or Williamson Act contracts; the project would result in a less than significant impact related forestry resources. Therefore, the project would not contribute to a potential cumulative impact to agricultural or forestry resources in the project area. |
| Air Quality | Less than significant air quality impacts would be associated with construction impacts. BMPs and APMs discussed in Section 5.3, Air Quality, would ensure that air quality impacts would be less than significant. Air quality impacts for other projects listed in Table 5.18-1 would be under the same federal, state, and regional regulation. It is therefore anticipated that impacts from other projects would be similarly mitigated; therefore, taken in their entirety the projects listed in Table 5.18-1 and the proposed project would not result in a cumulatively considerable impact. |
| Biological Resources | Long-term impacts to biological resources be would be localized to the proposed new substation site and existing right-of-way. Implementation of APMs and mitigation measures would reduce impacts to biological resources to less than significant. It is anticipated that the proposed project combined with the projects listed in Table 5.18-1 would not have cumulatively significant or considerable impacts. Because the projects listed in Table 5.18-1 would be subject to the same federal, state, and local regulations and would incorporate the feasible mitigation measures to reduce significant biological impacts,. Given the tiny and localized nature of the impacts associated with the proposed project and the projects listed in Table 5.18-1, taken in their entirety, they would not result in a cumulatively considerable impact and would not contribute to cumulative impacts on biological resources. |
| Cultural Resources | The proposed project would have no impact on known cultural resources. Therefore, the proposed project would not contribute to an impact that would be cumulatively considerable. |
| Geology and Soils | The proposed project would result in less than significant impacts to geological and soils resources. Geological resources are subject to a federal, state, and regional regulatory framework designed to minimize exposure to geological hazards. The projects listed in Table 5.18-1 would be subject to the same regulatory framework and would therefore also minimize and avoid exposure to geological hazards. Consequently, the potential combined impacts of the proposed project and identified projects would not result in a cumulatively considerable impact. |
| Greenhouse Gas Emissions | The proposed project is expected to have a less than significant impact on the environment through the minor generation of greenhouse gas (GHG) emissions during construction, and would only temporarily contribute to the cumulative effect on GHG emissions from other projects in the project area. Furthermore, the proposed project's operation would not require the combustion of fossil fuels; therefore, the proposed project's cumulative impact on GHG emissions would be less than significant. |
| Hazards and Hazardous Materials | Although the proposed project is in a Very High Fire Hazard Severity Zone, application of applicable APMs and mitigation measures would reduce the impact to less than significant. The projects listed in Table 5.18-1 would be subject to the same regulatory framework and would be required to comply with applicable wildland fire management plans and policies established by state and local agencies As such, there would be no cumulatively significant impact related to an increased risk of wildfire in the vicinity of the proposed project; therefore, no cumulative impacts relating to wildland fires would result. Hazardous materials that would be used during operation and construction are identified in Section 5.8, Hazards and Hazardous Materials. Hazardous materials would be stored and used in compliance with applicable regulations. Impacts from operational and construction use of hazardous materials would be less than significant. Hazardous materials impacts could combine with related impacts from nearby projects to |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 5.18-2
Analysis of Potential Cumulatively Considerable Impacts**

| | |
|---|---|
| | create a significant cumulative impact. Nearby projects would be required to comply with federal, state, and local regulations to minimize risk. The net effect would be a less than significant cumulative impact |
| Hydrology and Water Quality | The projects listed in Table 5.18-1 would be subject to the same federal, state, and local regulations regarding drainage plans and flooding potential as the proposed project, and would typically be required to draft and implement a stormwater prevention and protection plan with specific provisions that address erosion and sedimentation control during construction and operation. These impacts would be localized and controlled at the source and would not be considerable in relation to other cumulative projects. The proposed project would not contribute to cumulative effects on surface water or wetland resources in the project area. |
| Land Use and Planning | The proposed project would have no impact on habitat conservation plans or natural communities conservation plans, nor would it split any communities; therefore, it would not contribute to any impacts on these resources. Further, because the California Public Utilities Commission preempts city and county planning and discretionary actions, the project would not adversely contribute to cumulative impacts on local general plans. |
| Mineral Resources | The proposed project would result in no impacts to mineral resources and therefore would contribute no cumulative impacts to mineral resources. |
| Noise | The proposed project would not contribute to long-term ambient noise levels because it is a replacement project, which would add no significant new noise sources to the existing setting. The construction schedule could overlap with some of the projects described in Table 5.18-1. However, given the distance between the projects, they do not share the same environmental setting and would not result in cumulatively considerable impacts during construction. |
| Transportation and Traffic | The proposed project would replace an existing substation, and therefore would introduce no new long-term impacts to traffic or reduce level of service for critical roads such as I-5. Therefore, the project would not contribute to cumulatively considerable long-term impacts. Construction of the proposed project would have the potential for minor impacts to traffic volumes. These impacts would be temporary and less than significant. The potential for cumulative construction traffic impacts would be restricted to projects that are under construction simultaneously with the proposed project. However, given that such impacts would be of short duration and that all projects would be subject to traffic control plans, the project would not result in a cumulatively considerable impact to traffic. |
| Population and Housing; Public Services; Recreation; Utilities and Service Systems | Increased pressure on these services as a result of construction worker activity would be small. Additionally, construction would be 12 months or less in duration and would not result in long-term demand on any of these resources. The projects listed in Table 5.18-1 may result in similar effects, which would also be limited in duration and would not contribute to an increased long-term need for any of these services. The proposed project would result in less than significant impacts related to utilities and service systems. Therefore, the project would not contribute to a potential cumulative impact in relation to these services and utilities. Like PacifiCorp, most energy and utility providers plan infrastructure upgrades incrementally to accommodate planned growth in their service areas, based on adopted city/county general plans. The proposed project would accommodate the current and planned growth, but would not itself induce growth; thus, the project would not contribute to significant cumulative impacts on energy and utilities in the area. |

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less Than Significant Impact with Mitigation Incorporated. With integration of APMs into project design for air quality (APM-AQ-1), geology and soils (APM-GEO-1),

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

hazards and hazardous materials (APM-HAZ-1 through APM-HAZ-3), hydrology and water quality (APM-WQ-1 through APM-WQ-3), and transportation and traffic (APM-TT-1), in conjunction with mitigation measures for hazards and hazardous materials (MM-HAZ-1, MM-HAZ-2) and hydrology and water quality (MM-WQ-1), the proposed project would not have the potential to have environmental effects that could cause substantial direct or indirect adverse effects on human beings. The proposed project's impacts would all be less than significant.

Significance After Mitigation: Impacts would be **less than significant with mitigation incorporated.**

5.18.2 References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

Lucchesi, J. 2016. “RE: PacifiCorp Lassen Substation Project – California Public Utility Commission Environmental Review – Cumulative impact assessment.” Email from J. Lucchesi (City of Mount Shasta) to I. Fisher (Dudek) and R. Bryan (City of Mount Shasta). September 9, 2016.

Quiney, C. 2016. “Re: Lassen Substation Project.” Email from C. Quiney (Caltrans) to I. Fisher (Dudek) regarding Caltrans projects in the vicinity of the proposed Lassen Substation Project. September 13, 2016.

Walker, B. 2016. “Re: PacifiCorp Lassen Substation Project. California Public Utility Commission Environmental Review – Cumulative impact assessment.” Email from B. Walker (Siskiyou County) to I. Fisher (Dudek). September 9, 2016.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

6 LIST OF PREPARERS AND AGENCY CONSULTATION

6.1 Lead Agency

Michael Rosauer, CPUC Project Manager, Energy Division

6.2 Preparers

Dudek – Primary Consultant

Iain Fisher, Project Manager

Dylan Duvergé, Hydrogeologist and Environmental Analyst

Jennifer Reed, Senior Air Quality Specialist

Jennifer Sucha, Air Quality Specialist

Mike Greene, Noise Specialist

Josh Saunders, Aesthetics Specialist and Environmental Analyst

Markus Lang, Environmental Specialist

Keith Babcock, Senior Biologist

Scott Eckardt, Fire Hazards and Forestry

Laurel Porter, Technical Editor

Devin Brookhart, Publications Specialist Lead

David Mueller, Publications Specialist

Amy Steele, Publications Specialist

Rachel Strobridge, GIS Specialist

6.3 Agency Consultation

City of Mount Shasta

Juliana Lucchesi

City Planner

Planning Department

305 North Mount Shasta Boulevard

Mount Shasta, California 96067

Siskiyou County

Brett Walker, AICP

Senior Planner, Planning Division

Siskiyou County Community Development Department

806 South Main Street

Yreka, California 96097

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

California Department of Transportation

Chris Quiney
Senior Environmental Planner
Office of Environmental Management – Redding
Caltrans – District 2
1657 Riverside Drive
Redding, California 96001

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

7 INTRODUCTION TO RESPONSE TO COMMENTS

This chapter (Chapter 7), in conjunction with the previous chapters that contain the revisions to the Draft Initial Study/Mitigated Negative Declaration (IS/MND), constitutes the Final IS/MND for the proposed Lassen Substation Project (project).

This chapter of the Final IS/MND contains all of the comments received on the Draft IS/MND during the public review and comment period, and responses thereto. It is organized as follows:

- 7 Introduction
- 7.1 Common Responses to Recurring Comments
- 7.2 Comment Letters Received/Responses to Comments
- 7.3 References

The focus of the responses to comments in this chapter is on the disposition of significant environmental issues raised in the comments. Under Section 15074(b) of the California Environmental Quality Act (CEQA) Guidelines, written responses to comments made about an IS/MND are not required. It is, however, the practice of the California Public Utilities Commission (CPUC) to follow guidance specified by Section 15088(c) of the CEQA Guidelines and to provide responses to comments for an IS/MND. Detailed responses are not provided to comments on the merits of the proposed project or alternatives. When a comment is not directed to a significant environmental issue, the response indicates that the comment has been noted and no further response is necessary.

A number of comments received on the Draft IS/MND were similar and expressed similar environmental concerns. Rather than repeat responses, the themes of recurring comments have been summarized, and common responses on these topics are provided in Section 7.1, Common Responses to Recurring Comments. Cross-references to these common responses are provided in responses to specific comments contained within Section 7.2, which provides responses to all comments received during the public review period.

List of Commenters and Responses

During the public review period, 60 comment letters were received on the Draft IS/MND. These comment letters and their corresponding responses are organized in the following categories:

- A. Federal and state agencies and officials
- B. Community groups, non-profit organizations, and private organizations
- C. Individuals

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Each comment letter has been assigned a unique letter-number designation based on the category and chronology. Comment letters received and the unique letter-number designators for each are listed in Table 7-1. Individual comments within each letter are bracketed and numbered in the right-hand margin; the numbers correspond to the responses of the same letter-number designation.

**Table 7-1
Comment Letter Designations and Response Index**

| Comment Letter | Letter Date | From |
|----------------|-------------|--|
| A1 | 12/27/2016 | CDFW – Curt Babcock |
| B1 | 12/21/2016 | GNA – Raven Stevens |
| B2 | 12/22/2016 | WATER – Bruce Hillman |
| B3 | 12/23/2016 | Water Flows Free – Vicki Gold |
| B4 | 12/23/2016 | Water Flows Free – Vicki Gold |
| B5 | 12/23/2016 | Mount Shasta Tomorrow – Dale La Forest |
| B6 | 12/23/2016 | Market Place Insurance Service – Richard Lucas |
| B7 | 12/12/2016 | Siskiyou Economic Development – Tonya Dowse |
| C1 | 12/7/2016 | Larry Stock |
| C2 | 12/8/2016 | Ted Marconi |
| C3 | 12/13/2016 | Nancy J. Gandrau |
| C4 | 12/20/2016 | Kathy Zavada |
| C5 | 12/21/2016 | Dave Casebeer |
| C6 | 12/21/2016 | Mark Greenberg |
| C7 | 12/21/2016 | Francis Mangels |
| C8 | 12/22/2016 | Todd Cory |
| C9 | 12/22/2016 | Joel Goodman |
| C10 | 12/22/2016 | Bobby J. Henson |
| C11 | 12/22/2016 | Marilyn Lemmon |
| C12 | 12/22/2016 | Dan Rice |
| C13 | 12/22/2016 | Mary Saint-Marie |
| C14 | 12/22/2016 | Marilyn Taylor |
| C15 | 12/22/2016 | Marsha Yates |
| C16 | 12/23/2016 | John Adamson |
| C17 | 12/23/2016 | Daniel Axelrod |
| C18 | 12/23/2016 | Laura Berryhill |
| C19 | 12/23/2016 | Molly Brown |
| C20 | 12/23/2016 | Angelina Cook |
| C21 | 12/23/2016 | Shanta Gabriel |
| C22 | 12/23/2016 | Beverly Jean Harlan |
| C23 | 12/23/2016 | Rhea Harlow |
| C24 | 12/23/2016 | Tom Hesseldenz |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**Table 7-1
Comment Letter Designations and Response Index**

| Comment Letter | Letter Date | From |
|----------------|-------------|---------------------|
| C25 | 12/23/2016 | Ana Holub |
| C26 | 12/23/2016 | Joa Janakoayas |
| C27 | 12/23/2016 | Carol Jenkins |
| C28 | 12/23/2016 | Bill Korbel |
| C29 | 12/23/2016 | Kate Korbel |
| C30 | 12/23/2016 | Victoria Lee |
| C31 | 12/23/2016 | Tracie Lin |
| C32 | 12/23/2016 | Gayin Linx |
| C33 | 12/23/2016 | Dori Mondon |
| C34 | 12/23/2016 | Betsy Phair |
| C35 | 12/23/2016 | David Moss |
| C36 | 12/23/2016 | Jeannine Michaelson |
| C37 | 12/23/2016 | Catherine Preus |
| C38 | 12/23/2016 | Carolyn Real |
| C39 | 12/23/2016 | John Sanguinetti |
| C40 | 12/23/2016 | Touson Saryon |
| C41 | 12/23/2016 | Bruce Shoemaker |
| C42 | 12/23/2016 | Brian Stewart |
| C43 | 12/23/2016 | Ray Strack |
| C44 | 12/23/2016 | Frank Toriello |
| C45 | 12/23/2016 | Jack Trout |
| C46 | 12/23/2016 | Jack Trout |
| C47 | 12/23/2016 | Cecil Wilkerson |
| C48 | 12/26/2016 | Monte Bloomer |
| C49 | 12/26/2016 | Suzanne Frost |
| C50 | 12/27/2016 | Dorian Aiello |
| C51 | 12/23/2016 | Jim Cody |
| C52 | 12/7/2016 | Francis Mangels |
| C53 | 12/8/2016 | Russ Porterfield |
| C54 | 12/12/2016 | John E Kennedy Sr. |

7.1 Common Responses to Recurring Comments

A number of the comments received on the Draft IS/MND addressed the same or similar issues and environmental concerns (see Section 7.1.1, Summary of Issues Raised). Rather than repeat responses to recurring comments in each letter, common responses were prepared (see Section 7.1.2, Common Responses).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

7.1.1 Summary of Issues Raised

Table 7-2 provides a list of recurring comments related to the Draft IS/MND.

Table 7-2
Common Issues and Responses

| Response No. | Common Issue | Origin of Comment |
|--------------|---|---|
| GEN1 | The whole of the action and piece-mealing; the linkage between the proposed project and the Crystal Geyser bottling plant project | C6-1, C17-1 and -4, C18-3, C-20-4, C31-1, C42-2, C44-1, C49-1, C52-1 |
| GEN2 | Alternatives – Undergrounding of transmission lines | C7-1, C15-1, C19-1, C23-1, C40-1, C47-1, C48-1, C49-1 |
| GEN3 | Aesthetic impacts | C5-1, C8-3, C10-1, C11-2, C20-2, C25-1, C27-1, C39-1, C40-2, C41-1, C42-2, C44-2, C47-1, C48-1, C49-1 |
| GEN4 | Undergrounding requirements of local ordinances | C6-2, C10-2, C11-1, C14-1, C15-4, C18-4, C20 -2, C44-2 |

7.1.2 Common Responses

GEN1: Determining the Whole of the Action

Several commenters highlighted the link between the proposed project and the Crystal Geyser Water Company bottling plant project (Crystal Geyser project). The proposed project is considered by the CPUC to be an independent project that has utility independent of the Crystal Geyser project. Consequently, the CPUC does not consider the proposed project to be part of the Crystal Geyser project, which is currently under review by the County of Siskiyou (County).

As established in *Del Mar Terrance Conservancy Inc. v. City Council of San Diego* 1992 CA 4th 712, 736, and supported in subsequent cases,¹ a proposed project (in this case the Lassen Substation Project) need not include a potentially related project (in this case the Crystal Geyser project) where it can be demonstrated that the related project is not necessary for the proposed project to proceed and where the proposed project has independent utility.

In this case, the CPUC has determined that there is a need for the proposed project independent of the Crystal Geyser project. As stated in the project objectives in Section 4.2 of the IS/MND, the proposed project has three objectives:

¹ *Communities for a Better Environment v. City of Richmond* (2010) 184 CA4th 70; *Planning and Conservation League v. Castaic Lake Water Agency* (2009) 180 CA4th 210, 237; *Sierra Club v. West Side Irrigation District* (2005) 128 CA4th 690.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- Ensure that all equipment and structures comply with current company, state, and federal standards,² including the replacement of aging and non-standard equipment and the removal of sulfur hexafluoride (SF₆) distribution breakers.
- Ensure a reliable ongoing electricity supply to the area currently served by the Mount Shasta Substation.
- Facilitate regional bulk transmission voltage stability and improve bulk power transfer across the region.

Although comments contend that the project's goal is to support the proposed Crystal Geyser bottling plant and consequently should be analyzed as part of the Crystal Geyser project, the comments do not give weight to the other objectives of the proposed project. To demonstrate that the proposed project is part of the Crystal Geyser project, the commenters would have to demonstrate that the proposed Lassen Substation serves no other purpose than to serve the Crystal Geyser project. Given the age and condition of the current substation, and an objective of the proposed project to provide a reliable ongoing electricity supply to the area currently served by the Mount Shasta Substation, there is substantial evidence in light of the whole of the record (including in the Proponent's Environmental Assessment and subsequent data requests) to support the need for a replacement substation regardless of the fate of the Crystal Geyser bottling plant. Further, to function as described in the project description, the proposed project would not require the construction and operation of the Crystal Geyser bottling plant. Finally, a CPUC decision does not pre-judge the decision from the County to permit the Crystal Geyser bottling plant (i.e., the County could still reject the Crystal Geyser project and the CPUC could still determine that there is a need for the substation).

GEN2: Identifying Alternatives – Undergrounding of Transmission Lines

Many commenters stated that the proposed project's transmission lines should be undergrounded, either because of aesthetic impacts or because of local plans and ordinances. CEQA requires the environmental review to address the proposed project, and requires the development of alternatives only to mitigate significant impacts to environmental resources; CEQA does not require alternatives for environmental resources that have no significant impact. Since the overhead lines are part of the existing environment and the analysis determined that there would be no significant impacts associated with the proposed upgrades to the existing overhead lines, there are no requirements to develop or assess undergrounding alternatives.

² PacifiCorp 2016, DR 2.0 – Response 2.0a.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

GEN3: Aesthetic Impacts

Commenters indicated that proposed upgrading of the overhead transmission line would increase pole height and thickness, resulting in a significant impact to aesthetics. Components of the proposed project, including upgrading the transmission line and installing replacement poles, are evaluated in Section 5.1, Aesthetics, of the IS/MND for potential impacts to aesthetic resources (i.e., scenic vistas, scenic resources within a state scenic highway, existing visual character or quality of the site and its surroundings, and day- and nighttime views due to the introduction of new sources of substantial light or glare). The analysis presented in Section 5.1 concludes that the proposed upgrades to the existing transmission lines would have a less than significant impact to aesthetics. Although the observations submitted by the commenters are noted, they generally present the opinions of the individual and do not provide methodological or factual criticism of the IS/MND; therefore, no changes to the IS/MND have been made relating to this issue.

GEN4: Undergrounding Requirements of Local Ordinances

Several commenters highlighted County of Siskiyou and City of Mount Shasta General Plan policies and ordinances that promote the undergrounding of utilities. To restate the analysis in Section 5.10, Land Use, of the Draft IS/MND:

Pursuant to Public Utilities Code 1001, as implemented in General Order 131-D, the CPUC has sole and exclusive jurisdiction over the siting and design of the proposed project. It authorizes the construction, operation, and maintenance of PacifiCorp transmission facilities in California. The proposed project is therefore exempt from local land use zoning regulations and discretionary permitting.

Prior to the issuance of a permit, the CPUC is required to consider community values, recreational and park areas, historical and aesthetic values, and influence on environment (California Public Utilities Code, Section 1002). To this end, consistency with local jurisdictional land use policies is presented as part of the CEQA disclosure process as information for the public and decision makers during their deliberations.

In response to the comments that the project is inconsistent with local plans and ordinances, Table 5.10-3 was added to Section 5.10, Land Use, of the IS/MND to clarify the consistency between the proposed project and policies specific to transmission and energy, including local undergrounding ordinances. The table is reproduced in this section as Table 7-3 for convenience. As demonstrated in Table 7-3, the overhead portion of the proposed project would be consistent with applicable plans, policies, and regulations relevant to the project area.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 7-3
Consistency with Energy/Transmission-Specific County and City General Plan Policies

| General Plan Regulations | Proposed Project |
|--|---|
| <i>Siskiyou County General Plan Energy Element</i> | |
| 31. Energy facilities shall only be approved if in compliance with all applicable provisions of the General Plan and Zoning Ordinance; and construction shall start only after all applicable federal, state, and local permits have been obtained and permit conditions satisfied. | Not applicable – The County of Siskiyou has no jurisdiction over the proposed project; there is therefore no approval to give. |
| 32. In the absence of compelling or contravening considerations, energy facilities should not be sited in sensitive natural resources areas, including: unstable geologic or soil areas; floodplains; wetlands; habitat of fish or wildlife species of rare, threatened, endangered, or special concern status; known paleontological, archaeological, ethnographic, or historical sites; or designated scenic areas. If siting in such areas is unavoidable, it shall be limited to the smallest possible portion of the energy facility in question, and shall be mitigated in accordance with CEQA. | Consistent – The substation and transmission upgrades are sited outside of sensitive resource areas to the extent feasible and impacts will be fully mitigated. |
| 33. Wherever possible, increased demand for energy transmission shall be accommodated with existing transmission facilities. Where new capacity is necessary, priority shall be given to upgrading or reconstruction of existing facilities, followed by new construction along existing transmission or other utility corridors. Any new transmission facilities shall be sited so as to minimize interference with surrounding land-uses, and in ways that minimize their visual impacts (Siskiyou County Planning Department 1993, Energy Facilities, Policies). | Consistent – The proposed project would rebuild and upgrade existing transmission facilities within existing rights-of-way. The new substation is sited on already-disturbed parcels adjacent to the existing substation, thus minimizing unnecessary spread of transmission facilities. |
| K.3. The siting of transmission lines shall avoid interfering with scenic views, and shall be visually integrated with the surrounding setting to the greatest extent possible. Applicable visual mitigations include, but are not limited to avoiding ridgelines or other visually prominent features, and using non-glare towers and non-specular lines which more readily blend into the natural landscape (Siskiyou County Planning Department 1993, Zoning Ordinance, Implementation Measures). | Consistent – As discussed in Section 5.1, Aesthetics, the proposed project would not significantly interfere with a scenic vista. The rebuilding of the 69-kilovolt transmission line represents an incremental change to the existing baseline conditions. The replacement line is framed against the forest to the west of the line and is partially screened by roadside shrubs and trees along Interstate 5. |
| <i>Siskiyou County General Plan Scenic Highways Element</i> | |
| To protect the visual quality along scenic route corridors, the County adopted the following principles, which are applicable to the proposed project: 1. Provide for normal use of the land and protect against unsightly features. 2. Locate transmission lines and towers outside of Scenic Corridors when feasible. 3. Establish architectural and site design review by the appropriate local jurisdiction. 4. Use landscaping to increase scenic qualities (Siskiyou County Planning Department 1974, Principle C: The Scenic Route Corridor). | Consistent – The proposed project would not introduce new facilities into a scenic route corridor. Facilities already exist and are being upgraded. |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Table 7-3
Consistency with Energy/Transmission-Specific County and City General Plan Policies

| General Plan Regulations | | Proposed Project |
|--|---|---|
| <i>City of Mount Shasta General Plan Open Space/Conservation Element</i> | | |
| OC-7.1(d): | Require undergrounding of all new utilities wherever practical. Encourage other agencies and entities to underground their facilities. Where undergrounding is impractical, aboveground lines shall be located to minimize impacts on sensitive scenic areas (City of Mt. Shasta Planning Department 2007, Scenic Resources). | Consistent – The proposed project is not a new facility but an upgrade to existing facilities; Therefore, the policy does not apply to the proposed project. |

7.2 Comment Letters Received/Response to Comments

Table 7-1 provides a list of all agencies, organizations, and individuals that provided comments during the established public review period on the accuracy and sufficiency of the Draft IS/MND. The comments and the responses to environmental issues raised in these comments are presented below. Comment letters are organized under the following categories: (A) Agencies, (B) Organizations, and (C) Individuals.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

A. Agencies

Comment Letter A1



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Region 1 – Northern
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



December 27, 2016

Michael Rosauer
Project Manager
California Public Utilities Commission, c/o Dudek
605 Third Street
Encinitas, California 92024

**Subject: Review of Draft Initial Study and Mitigated Negative Declaration for
the PacifiCorp Lassen Substation Project, State Clearinghouse
Number 2016112057, Siskiyou County, California**

Dear Mr. Rosauer:

The California Department of Fish and Wildlife (Department) has reviewed the Draft Initial Study and Mitigated Negative Declaration (IS/MND) dated November 2016, for the above-referenced project (Project).

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, we appreciate the opportunity to provide comments regarding those aspects of the Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

THE DEPARTMENT'S ROLE

The Department 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; California Environmental Quality Act (CEQA) Guidelines § 15386, subd. (a).) The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, the Department 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.

The Department is also submitting comments as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). The Department expects that it may need to exercise regulatory authority as provided by the Fish and

Conserving California's Wildlife Since 1870

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Michael Rosauer
California Public Utilities Commission
December 27, 2016
Page 2

Game Code. As proposed, for example, the Project may be subject to our 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.

Project Description

The Project is located within the City of Mount Shasta and in unincorporated Siskiyou County. The new substation would be located on Assessor Parcel Numbers (APN) 036-220-280 and 036-220-170. The transmission and distribution line upgrades would predominantly take place in existing rights-of-way on the western side of Interstate 5.

The Project, as proposed in the IS/MND, is to replace the existing Lassen Substation, upgrade the existing 69 kV transmission line that supplies that substation, and upgrade the distribution system supplying the City of Mount Shasta. The primary objectives of the Project include: (1) ensuring all equipment and structures comply with current company, state, and federal standards including replacement of aging and non-standard equipment and the removal of sulfur hexafluoride distribution breakers; (2) ensure a reliable electricity supply to the area currently served by the substation; and (3) facilitate regional bulk transmission voltage stability and improve bulk power transfer across the region.

Comments and Recommendations

Plants

Salvage/Relocation

On page 5.4-13, APM-BIO-1 mitigation measure states that focused pre-construction surveys for special-status plant species shall be conducted and that if special-status plant species are located, avoidance measures will be incorporated. If the avoidance is not possible, then "relocation efforts, including topsoil salvage and relocation, if necessary, will be implemented." The Department would prefer that the focused surveys be conducted at the appropriate time of year prior to any designs being finalized so that avoidance of the special-status plant species could be incorporated where it is feasible into the final designs.

A1-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Michael Rosauer
California Public Utilities Commission
December 27, 2016
Page 3

The Department generally considers salvage and relocation (translocation) to be an inappropriate way to compensate for permanent impacts to rare, threatened, endangered, and sensitive native plants (rare plants). Rare plant translocations for mitigation have a low success rate (less than ten percent in the attached report¹) and the Department considers such efforts experimental, unless they have been demonstrated to be effective through long-term experimentation. Successful rare plant translocations require many years of habitat surveys, habitat modeling, site selection, seed collection, plant propagation, site preparation, monitoring, and remedial actions such as management of competing plants, supplemental watering, and supplemental planting. Success is not guaranteed, and even translocations that are initially successful may fail to persist over the long term.

Furthermore, transplantation efforts do not replace intact ecosystems or maintain the entire range of genetic diversity at the impact site. The presence of rare plants often signifies the presence of biogeographically important sites with unusual soil, microclimate, or other conditions that are not easy to identify and difficult or impossible to duplicate. Loss of genetic material from rare plant translocation may also hinder introduced populations from withstanding changing environmental conditions over time. The most effective way to mitigate for permanent loss of rare plant habitat is therefore to protect and manage existing populations in their natural habitat.

There is no restoration plan or what would be required in the plans for the relocation of any of the potential special-status plant species. All mitigation in a MND needs to be developed and agreed upon prior to the approval of the Project; therefore, a relocation/salvage plan for special-status plant species potentially occurring onsite should be developed, reviewed, and approved by the Department given the information provided above prior to Project approval.

Vegetation Impacts

On page 5.4-13, APM-BIO-3 mitigation measure states, "Every reasonable effort shall be made to minimize temporary and permanent removal of native vegetation at work areas." The measure further states that a "revegetation plan shall be prepared for areas of native vegetation temporarily affected by project construction activities." All mitigation in a MND needs to be developed and agreed upon prior to the approval of the Project; therefore, all plans should be developed and reviewed by the Department prior to Project approval.

A1-1
Cont.

A1-2

¹ Peggy, Fiedler L. *Mitigation-related Transplantation, Relocation and Reintroduction Projects Involving Endangered and Threatened, and Rare Plant Species in California*. 157 pgs., 1991. Print.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Michael Rosauer
California Public Utilities Commission
December 27, 2016
Page 4

Lake and Streambed Alteration Agreement

On page 5.4-13, APM-BIO-4 states that if construction crews will, to the extent feasible, avoid affecting the streambeds and banks of any streams along the route and a Lake and Streambed Alteration Agreement (LSAA) will be secured, if necessary. The Department recommends obtaining the LSAA prior to the start of construction to avoid time delays.

A1-3

Bats

On page 5.4-20 it states that "Focused surveys for roosts of these species would be conducted prior to the initiation of construction activities pursuant to APM-BIO-1." There is not any detailed information on what sort of avoidance measures will be used, the type of surveys to be conducted or by whom. The Department recommends that all bat surveys are conducted by a qualified bat biologist and that appropriate avoidance and minimization measures be developed for the specific species potentially impacted. The Department recommends adding this additional information to APM-BIO-1. If species are located, avoidance, minimization, and/or mitigation measures should be developed in consultation with the qualified bat biologist and the Department prior to Project approval.

A1-4

Willow Flycatcher

On page 5.4-15, APM-BIO-12 mitigation measure states that if willow flycatchers are detected during pre-construction surveys, there will be a 150-foot buffer put in place. The Department recommends that this buffer be changed to "**....500 feet or in consultation with California Department of Fish and Wildlife**, and construction activities will not occur within the buffer area for the remainder of the nesting season." The Department typically uses a 300-500 foot buffer for this species; however, the buffer is dependent on the topography and type of construction activity.

A1-5

On page 5.4-15, APM-BIO-13 mitigation measure states operation and maintenance activities in or near potential willow flycatcher habitat, will be conducted outside their nesting season (June 1 to August 31) wherever practicable. If there is the potential for work to take to be conducted within willow flycatcher habitat when they are present, an Incidental Take Permit (ITP) should be obtained. Information for obtaining an ITP can be found here:
<https://www.wildlife.ca.gov/Conservation/CESA/ITP-Review-Standards>

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Michael Rosauer
California Public Utilities Commission
December 27, 2016
Page 5

Wetlands

On page 5.4-22, identifying 1.978 acres of temporary impacts to wetlands as "less than significant" is incorrect. The Department has a "No Net Loss" of wetlands Policy.

Fish and Game Commission Wetlands Policy ²

The Fish and Game Commission finds that:

- I. California's remaining wetlands provide significant and essential habitat for a wide variety of important resident and migratory fish and wildlife species.*
- II. The quantity and quality of the wetlands habitat remaining in California have been significantly reduced; thus, maintenance and restoration are essential to meet the needs of the public for fish and wildlife resources and related beneficial uses. In addition, the protection, preservation, restoration, enhancement and expansion of wetlands as migratory bird breeding and wintering habitat are justly recognized as being critical to the long-term survival of such species. Wetland habitat is also recognized as providing habitat for over half of the listed endangered and threatened species in California.*
- III. Projects which impact wetlands are damaging to fish and wildlife resources if they result in a net loss of wetland acreage or wetland habitat value.*
- IV. Through the passage of Senate Concurrent Resolution 28 (January 1, 1983), the Legislature, in recognition of the importance of wetlands, indicated its "intent to preserve, protect, restore and enhance California's wetlands and the multiple resources which depend upon them for the benefit of the people of the State". In addition, on August 23, 1993, Governor Wilson issued the California Wetlands Conservation Policy which established a specific goal of "no net loss of wetlands." To achieve this goal, the policy emphasizes program elements that reduce procedural complexity with wetland conservation programs, and encourages landowner incentive programs and cooperative planning efforts such as Central Valley Joint Venture.*

A1-6

² Fish and Game Commission Wetlands Resources Policy (Amended 8/18/05)

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Michael Rosauer
California Public Utilities Commission
December 27, 2016
Page 6

Therefore, it is the policy of the Fish and Game Commission to seek to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California.

Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion which would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage.

The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values.

The Department considers all impacts to wetlands, temporary or permanent, as significant. The IS/MND states that "Removal of wetland vegetation could alter wetland ecosystems and result in localized erosion and filling of waters or wetlands downgradient from the site through sedimentation." Given the potential for additional impacts identified in the IS/MND, and the Department's "no net loss" policy, mitigation measures should be developed to reduce impacts to less than significant. The Department recommends using a mitigation measure of 3:1 for wetland impacts³. The Department would need to review and approve the mitigation measures prior to Project approval.

Environmental Monitor

On page 5.4-14, the APM-BIO-6 mitigation measure should give the Environmental Monitors the authority to shut down the Project if it is determined that Project activities may adversely affect special-status species until the monitor can contact the appropriate agencies for consultation.

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, § 21003, subd. (e)). Please report any special status species and natural

A1-6
Cont.

A1-7

A1-8

³ Technical Memorandum: Development, Land Use, and Climate Change Impacts on Wetland and Riparian Habitats
California Department of Fish and Wildlife, Northern Region, May 21, 2014

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Michael Rosauer
California Public Utilities Commission
December 27, 2016
Page 7

communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

All pre-construction surveys results shall be sent to the Department at the following address:

California Department of Fish and Wildlife
ATTN: CEQA
601 Locust Street
Redding, CA 96001

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and 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 the Department. 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).

If you have any questions, please contact Amy Henderson, Senior Environmental Scientist (Specialist), at (530) 225-2779, or by e-mail at Amy.Henderson@wildlife.ca.gov.

Sincerely,



 Curt Babcock
Habitat Conservation Program Manager

ec: Michael Rosauer
LassenSubstation@dudek.com

State Clearinghouse
State.clearinghouse@opr.ca.gov

Rachelle Pike, Kristin Hubbard and Amy Henderson
California Department of Fish and Wildlife
Rachelle.Pike@wildlife.ca.gov, Kristin.Hubbard@wildlife.ca.gov; and
Amy.Henderson@wildlife.ca.gov

A1-8
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter A1

**California Department of Fish and Wildlife
Curt Babcock
December 27, 2016**

A1-1 The commenter requests that focused surveys for special-status plants be conducted at the appropriate time of year prior to finalization of project design so that avoidance of special-status plants can be incorporated into final designs where feasible. The commenter notes that the California Department of Fish and Wildlife (CDFW) generally considers translocation of rare plants as an inappropriate mitigation measure to compensate for permanent impacts to rare plants, and that protection of existing rare plant populations is preferable. The commenter also states that the Draft Initial Study/Mitigated Negative Declaration (IS/MND) contains no information on what would be included in the translocation plan if translocation were to occur, and that a mitigation plan would need to be developed, reviewed, and approved by CDFW prior to project implementation.

As stated in Applicant Proposed Measure (APM) BIO-1, pre-construction surveys for special-status plant species “shall be conducted in appropriate habitat according to U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) protocols.” Such protocols require that botanical surveys be conducted during the appropriate blooming period for the species subject to surveys. For example, CDFW’s Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities states that surveys should be conducted “at the time of year when species are both evident and identifiable. Usually this is during flowering or fruiting” (CDFG 2009). Nevertheless, APM-BIO-1 has been revised to clarify that pre-construction surveys will be conducted during the appropriate blooming/fruiting period for special-status plants potentially occurring within construction areas.

As noted in Appendix B (Biological Resources Technical Report, Section 3.2; Power Engineers 2015) of the Proponent’s Environmental Assessment (PEA), no state- or federally listed threatened or endangered species are expected to occur within any of the construction sites due to lack of suitable habitat or because the sites are not within the range of such species. Avoidance of special-status plants is the first priority if special-status plants are found prior to project construction. Pursuant to APM-BIO-1, if special-status plant species are found during focused surveys within the project site, avoidance modifications for the placement of transmission towers, access and spur roads, and/or marshalling and staging areas will be made in accordance with the final project design.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Therefore, and as noted in APM-BIO-1, translocation of special-status plants would only be conducted if, after consideration of pole siting modifications and other measures, avoidance of such plant species is determined to not be feasible. Regarding the commenter's statement that the IS/MND contains no information on what would be included in the translocation plan if translocation were to occur, the commenter is directed to MM-BIO-1 in Section 5.4.4 of the Draft IS/MND, which focuses on the kind of information that would be included in the translocation plan and states that such a plan would need to be reviewed/approved by CDFW.

- A1-2** In reference to APM-BIO-3, the commenter states that any revegetation plan should be developed and reviewed by CDFW prior to project implementation.

APM-BIO-3 has been revised to include that any revegetation plan developed would need to be reviewed by CDFW prior to construction in the area of potential temporary impact. The APM has also been revised to include a brief discussion of the primary components of the revegetation plan, and states that the plan would be developed by a qualified botanist or revegetation specialist.

- A1-3** CDFW recommends that any Lake and Streambed Alteration Agreement that may be required in association with the project be obtained prior to the start of construction to avoid delays. APM-BIO-4 has been revised to note that a Lake and Streambed Alteration Agreement, if needed, will be prepared and submitted to CDFW for review/approval prior to construction in the affected area.

- A1-4** For bat surveys and any mitigation that may be necessary, the commenter recommends that APM-BIO-1 be revised to include information on the type of surveys to be conducted and by whom (the commenter recommends that all surveys be conducted by a qualified biologist), and that appropriate avoidance/minimization measures be developed if a particular species could be impacted. The commenter also states that any avoidance, minimization, and/or mitigation measures should be developed in consultation with the qualified bat biologist and CDFW prior to project implementation. APM-BIO-1 has been revised to include the type of bat surveys to be conducted prior to construction; that such surveys will be conducted by a qualified bat biologist; and that any avoidance, minimization, and/or mitigation measures deemed necessary will be developed in consultation with CDFW.

- A1-5** The commenter recommends revising APM-BIO-12 to reflect that the nest avoidance buffer, if willow flycatchers are detected during pre-construction surveys, should be "500 feet or in consultation with California Department of Fish and Wildlife." The

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

commenter also suggests modifying APM-BIO-13 to include the need for a state Incidental Take Permit (ITP) should project construction be potentially conducted within habitat that is occupied by willow flycatcher during the nesting season. APM-BIO-12 has been revised to include the text regarding nest buffers suggested by the commenter. APM-BIO-13 has also been revised to note that an ITP may be required if construction occurs within habitat currently occupied by willow flycatchers.

- A1-6** The commenter states that because of CDFW’s “no net loss of wetlands” policy, any loss of wetland habitat, temporary or permanent, is a significant impact under the California Environmental Quality Act (CEQA). According to the commenter, the conclusion in the IS/MND regarding the temporary loss of 1.987 acres of wetland habitat associated with pole installation should be revised to significant, and mitigation measures should be developed to reduce impacts to less than significant.

As noted in the beginning of Section 5.4 of the IS/MND, the significance of potential impacts on biological resources is based on criteria listed in Appendix G of Section 15064.7 of the CEQA Guidelines. The IS/MND evaluation of whether an impact would be “substantial,” and therefore significant in the context of the proposed project, considers such factors as the intensity of any disturbance, the amount and/or extent (e.g., acreage) of the wetland to be affected, the relative biological value (rarity/sensitivity status, ecological functions and values, disturbance history) of the wetland, and its relevance within a specified geographical area (e.g., is the wetland isolated or part of a complex wetland system; does the impact to the wetland contribute substantially to the loss of that resource from a regional perspective). These factors are evaluated based on the results of on-site biological surveys and studies, results of literature and database reviews, discussions with biological experts, and established and recognized ecological and biodiversity concepts and assumptions.

To summarize the conditions for the relevant part of the proposed project, 17 upgraded wooden transmission poles would be placed within habitats that were determined to meet the criteria as wetlands potentially under the jurisdiction of the U.S. Army Corps of Engineers. The vast majority of these wetland areas that are characterized in Appendix D (Lassen Substation Jurisdictional Delineation Report; Power Engineers 2015) of the PEA are dry or seasonally wet montane meadow, much of which has been disturbed by heavy grazing. Based on surveys conducted in 2014 and 2015, none of these meadow habitats support, or potentially support, threatened or endangered species that would be impacted by the installation of the new poles. Further, none of these montane meadow wetlands hydrologically support or connect to rare or sensitive habitats such as vernal pools.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The commenter states that the conclusion in the IS/MND that temporary impacts to 1.987 acres of wetland habitat would be “less than significant” is incorrect. With respect to the potential for temporary impacts, the new poles would be installed adjacent (within 5 to 8 feet) to the existing poles, and access to the pole installation work areas would occur along an existing maintenance access route. Furthermore, and as stated on page 5-22 of the Draft IS/MND, a number of APMs are proposed to avoid and/or minimize the potential for adverse impacts, including temporary impacts, on wetland habitats. These include APM-BIO-3 (minimize vegetation impacts, revegetate impacted areas), APM-BIO-5 (use of special access methods to avoid/minimize temporary impacts to wetlands due to access), APM-BIO-6 (environmental monitors during construction to ensure avoidance of native vegetation and unique resources), APM-BIO-8 (Worker Environmental Awareness Program), and APM-BIO-10 (restriction to established roadways and access routes), that would avoid and/or substantially minimize impacts on wetlands. In particular, APM-BIO-5 stipulates that high density polyethylene (HDPE) driving mats, portable road platforms, or similar technologies would be used to minimize temporary impacts to wetland vegetation and soils due to vehicle access to pole replacement sites. Because of the short duration associated with removal of existing poles and installation of new poles, any compressed vegetation is expected to recover in a short time.

As noted in Section 5.4.3 of the Draft IS/MND, APMs are intended to minimize the potential for impacts resulting from construction, operation, and maintenance of the proposed project before such impacts can occur. With implementation of these measures before and during pole extraction and installation-related activities within identified wetland habitat areas, temporary impacts associated with pole installation work areas and access are expected to be offset by these APMs.

As noted in the commenter’s recitation of the California Fish and Game Commission’s Wetlands Policy, the policy states, “the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be ‘no net loss’ of either wetland habitat values or acreage.” Each of the upgraded wooden poles replaces an existing older wooden pole on a 1:1 basis and in a location very close (estimated to be within 5 to 8 feet) to the existing poles. Once an older pole is removed, the remaining habitat area where the pole was removed is expected to revert to wetland habitat with functions and values representative of the existing surrounding habitat. Consequently, the reversion of the existing pole locations to wetland habitat is expected to offset the loss of wetlands associated with the

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

installation of the new poles such that no net loss of wetland acreage and associated functions and values would occur.

The commenter quotes the IS/MND as stating that “removal of wetland vegetation could alter wetland ecosystems and result in localized erosion and filling of waters or wetlands down gradient from the site through sedimentation.” The intent of this statement was to indicate the type of impacts that could occur on a given site as a result of wetland vegetation removal and sedimentation. However, as noted in Section 5.4.1 of the IS/MND, much of the montane meadow wetland habitat within the proposed right-of-way (ROW) is heavily grazed; it is also within relatively flat terrain. In addition, the amount of habitat to be permanently removed in association with new pole installations would total only 28.58 square feet. Furthermore, soil and earth extracted from the new pole locations would be used to fill the holes left from the extraction of the nearby existing poles; any excess soil and earth would be hauled from the site. Therefore, because of the very small amount of grazed wetland meadow habitat to be removed, and because no local or downgradient sedimentation would occur as a result of new pole installation, impacts associated with the project are not expected to alter wetland ecosystems or result in localized erosion and filling of waters or wetlands downgradient from the site through sedimentation.

Consequently, because new poles would replace existing poles on a 1:1 basis and the areas in which the existing poles would be extracted are expected to revert to wetland habitat within a short period, effectively resulting in no permanent net loss of wetlands; because installation of new poles would only impact a total 28.58 square feet of wetland habitat and is therefore not expected to result in an alteration of existing wetland ecosystems; and because the APMs listed in the IS/MND would avoid, minimize, and/or otherwise mitigate any potential temporary impacts associated with pole installation work areas and access, permanent and temporary impacts would not be expected to rise to a level of significance under CEQA. Therefore, no change to the IS/MND conclusion regarding the significance of wetland impacts has been made.

As a result of this comment, Section 5.4.4(c) of the IS/MND has been revised to provide further clarification regarding wetland impacts, specifically the following rationale supporting a less than significant impact:

In summary, (1) much of the wetland habitat where poles would be installed is relatively disturbed due to heavy grazing; (2) no threatened/endangered plant or animal species are known to occur

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

within the areas of wetland habitat to be impacted by pole installation; (3) the wetland habitats that would receive new poles do not hydrologically or ecologically support rare habitats such as vernal pools; (4) no net loss of wetland habitat acreage or functions and values is expected to occur since the locations where the existing poles would be removed are expected to revert to wetland habitat at a similar square footage and with similar functions and values as the habitat that would be impacted by the new poles; (5) the total amount of permanent impacts (28.58 square feet) associated with pole installation and the potential temporary impacts (1.97 acres) associated with vehicle access and pole installation work areas is quite small in relation to the amount of existing wetland habitat within the ROW; and (6) implementation of the proposed APMs included in this Initial Study/Mitigated Negative Declaration is expected to either avoid or substantially minimize the potential for temporary impacts associated with pole installation. Potential impacts on wetland habitats as a result of the proposed project are not expected to rise to the level of a substantial adverse impact (Section 5.4.4(c) of this IS/MND).

- A1-7** The commenter recommends that APM-BIO-6 be revised to give the environmental monitor authority to halt construction activities if it is determined that such activities may adversely affect special-status species and until the monitor can contact appropriate resource agencies for consultation. APM-BIO-6 has been revised per the commenter's recommendation.
- A1-8** The commenter requests that any special-status species/natural communities detected during project surveys be reported to the California Natural Diversity Database (CNDDDB). No special-status plant or wildlife species were observed during the initial reconnaissance-level surveys conducted for the project site. However, the project proponent will ensure that any observations of special-status plant or wildlife species recorded during the more focused pre-construction surveys required by the IS/MND (APM-BIO-1, APM-BIO-7, APM-BIO-12) will be submitted to the CNDDDB.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

B. Organizations

Comment Letter B1

From: [Raven](#)
To: [Lassen Substation Project](#)
Subject: Fwd: GNA PacifiCorp Lassen Substation Project (Application No. 15-101-005).pdf
Date: Wednesday, December 21, 2016 7:30:52 PM
Attachments: [GNA PacifiCorp Lassen Substation Project \(Application No. 15-101-005\).pdf](#)

I neglected to put my email on the comment letter below so I would also like to ask that you keep me posted on this project and notify me of the release of any CEQA documents and/or meetings or hearings regarding the above-referenced project: PacifiCorp Lassen Substation Project (Application No. 15-101-005)
Thank you!

Raven Stevens
flyraven@sbcglobal.net

Begin forwarded message:

From: Raven <flyraven@sbcglobal.net>
Subject: GNA PacifiCorp Lassen Substation Project (Application No. 15-101-005).pdf
Date: December 21, 2016 at 4:53:18 PM PST
To: LassenSubstation@dudek.com

Thank you for the ability to comment on the Lassen Substation Project (Application No. 15-101-005). See comments attached.

Raven Stevens
Gateway Neighborhood Association

B1-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Gateway Neighborhood Association (GNA)
724 Butte Ave.
Mt. Shasta, CA 96067

December 21, 2016

Michael Rosauer, Project Manager
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Draft Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project (Application No. 15-101-005)
SCH# 2016112057

Dear Mr. Rosauer:

The Gateway Neighborhood Association is a group of 78 homeowners, living in the northeast corner of the Mt. Shasta area. Our "association" is defined by the close proximity of our homes to the proposed Crystal Geyser Plant. We request notification of the release of any CEQA documents and/or meetings or hearings regarding the above-referenced project.

The proposed Lassen substation project ("Project"), as we read it, addresses several improvements and upgrades to the power distribution system in the Mt. Shasta area. While many aspects of this project may be needed and are desirable for the Mt. Shasta area, there are aspects that need to be considered either by this MND or via the your commissioners office or ALJ.

First, the main reason for the upgrade is the power requirement for the Crystal Geyser Water Company's proposed bottling plant ("Bottling Plant").

The Initial Study/Mitigated Negative Declaration ("IS/MND") states as follows: "The proposed project would provide for anticipated growth in power demand in the Mount Shasta service area, primarily due to the expected construction of a Bottling Plant, which is projected to use the remaining available power capacity on the existing system.
(IS/MND, p. 5.13-5.)

The record for the Project includes many references to the need for the Project resulting largely from the expected demand of the proposed Bottling Plant. (See November 27, 2015 letter to the CPUC regarding the above-referenced project from We Advocate Thorough Environmental Review.) For example, page 18 of the

B1-1
Cont.

B1-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Environmental Assessment for the Project notes that the Bottling Plant will bring summer and winter loads to the system to 100 percent.

CEQA Guidelines section 15378 requires a study of the “whole of an action” which has the potential to result in a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. The Project will remove a barrier to the Bottling Plant project, and so the indirect impacts associated with the Bottling Plant and the extension of upgraded power service should be included in the IS/MND.

We are concerned that the EIR for the Bottling Plant will not adequately evaluate the noise impacts that will result from the generators on site. One vital mitigation for the Bottling Plant project would be the removal of the two propane power generators if they are hooked up to the upgraded power lines. Removal of the generators (other than an emergency backup generator) should be evaluated in the IS/MND as feasible mitigation for the indirect noise impacts associated with the Bottling Plant and power supply.

We are concerned about many of the Bottling Plant impacts, including, among other things, noise and water quality. We also believe the view-shed of our area is a big concern. It does not just concern the scenic byway views from Highway 5. While we appreciate the undergrounding of the branch lines into the city areas, most locals and many tourists/visitors also travel along Old Stage Road. They drive north to south on that road often to avoid Highway 5 and travel to Lake Siskiyou, Castle Lake, upper Sacramento River branches, Pacific Crest Trailheads and various campgrounds.

It is our position that in order to fully mitigate scenic impacts for the Project, including its indirect impacts associated with the Bottling Plant, the lines along Old Stage Road should also be underground. If ratepayers are ultimately paying for this, our view-shed is worth it, and there is no evidence that this mitigation measure is infeasible. It will also save Pacific Power in repair costs due to heavy, wet snow, which is more likely now due to the warming of our local climate. It makes sense to make this change now if the lines are going to be upgraded.

For the foregoing reasons we believe that in order for the IS/MND to satisfy the requirements of CEQA, the indirect impacts associated with the Bottling Plant and its upgraded power supply, such as the noise and aesthetic impacts, should be included in the IS/MND.

Sincerely,

Raven Stevens
Community Liaison
Gateway Neighborhood Association

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter B1

**Gateway Neighborhood Association (GNA)
Raven Stevens
December 21, 2016**

- B1-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration (IS/MND); therefore, no additional response is provided or required.
- B1-2** The comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.
- B1-3** The commenter raises concerns regarding the link between the proposed project and the Crystal Geyser bottling plant project (Crystal Geyser project). The proposed project has utility independent of the Crystal Geyser project, and permitting of the Crystal Geyser bottling plant is not required for the function of the proposed project. It is, therefore, the view of the California Public Utilities Commission (CPUC) that the proposed substation is independent of the Crystal Geyser project. Please see General Response 1 (GEN1) for a more detailed discussion. The commenter also raises concerns regarding the distribution of costs resulting from construction of the substation. Determination of cost is outside the purview of the CEQA process, so no further response is required.
- B1-4** The comment raises issues and concerns related to the environmental impact report for the Crystal Geyser project. The commenter does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.
- B1-5** The commenter requests the undergrounding of the transmission lines associated with the proposed project. Please see General Response 2 (GEN2) regarding undergrounding of the transmission lines.
- B1-6** The commenter's concerns with the proposed project are noted and will be included in the administrative record and considered by the CPUC during project deliberation.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Comment Letter B2

From: [MountShasta Water](#)
To: [Lassen Substation Project](#)
Subject: Lassen Substation, IS/MND comments
Date: Thursday, December 22, 2016 7:41:25 AM
Attachments: [WATER Comments on Draft IS-MND for PacifiCorp \[12-21-16\].pdf](#)

Attached are comments on the Lassen Substation project (Application No. 15-101-005) from We Advocate Thorough Environmental Review (W.A.T.E.R.), a local environmental 501(c)3 organization. Please acknowledge receipt of this comment.
Thank you,

Bruce Hillman
Board President
We Advocate Thorough Environmental Review (W.A.T.E.R.)
PO Box 873, Mount Shasta CA 96067
(530) 918-8805

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

December 21, 2016

Comments on Draft Initial Study and Mitigated Negative Declaration for PacifiCorp
Lassen Substation Project (Application No. 15-101-005)

Submitted by
We Advocate Thorough Environmental Review (W.A.T.E.R.)
PO Box 873, Mount Shasta, CA 96067
mountshastawater@gmail.com
Bruce Hillman, Board President

The proposed Lassen substation project plans to address several improvements and upgrades to the power distribution system in the Mt. Shasta area. While many aspects of this project may be needed and desirable for the Mt. Shasta area, one of the driving motivators of this Lassen substation project is the proposed Crystal Geyser plant. Page 311 (3.13-5) of the IS/MND states this directly:

"The proposed project would provide for the anticipated growth in power demand in the Mount Shasta service area, primarily due to the expected construction of a bottling plant, which is projected to use the remaining available power capacity of the existing system"

Also the northern part of this project upgrades the power line and the transformer to the Crystal Geyser plant itself, as stated on page 41 (4-11) of the IS/MND:

Three new 12.47 kV distribution lines would be installed to supply the City in three locations. Two existing lines, Pioneer Feeder and Black Butte Feeder, would be underbuilt on Line 2 to Ream Avenue and West Lake Street, respectively. In addition, a new distribution line would also be installed and built under the rebuilt Line 2 running northwest from the substation, before using existing distribution rights-of-way to supply industrial facilities on Ski Village Drive. (Figure 4-4).

The upgrade to 12.47 kV would require three new 12.47 to 4.16 kV stepdown transformers to be installed in the City of Mount Shasta on Chestnut Street between East Ivey Street and East Field Street, on Mill Street between Forest Street and Water Street, and at the bottling plant on Ski Village Drive.

DUDEK

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November 2016

Since this substation project was submitted to the CPUC, the Siskiyou County released a Notice of Preparation for the proposed Crystal Geyser plant and will be preparing a CEQA mandated Environmental Impact Report. This EIR is still in the draft stage and Siskiyou County has not yet released the Draft EIR for public review and comment. The Crystal Geyser EIR process must consider a "no project" alternative or other alternatives such a reduced project in terms of footprint, production, etc. (CEQA Guidelines, § 15126.6(e). If Siskiyou County adopts the no project alternative or reduced project alternative that may effect the CPUC's

B2-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

evaluation of need for such upgrades such as the new high voltage power line to the proposed Crystal Geyser plant or the amount or type of capacity needed at the substation itself. The Crystal Geyser plant project has not been approved and it is premature for the CPUC to consider aspects of the Lassen substation project mandated by Crystal Geyser's needs at this time. Without this bottling plant the needed substation upgrades and power lines would be considerably different.

B2-1
Cont.

CEQA process requires that an environmental evaluation must consider the "whole of the project". CEQA Guidelines, § 15063(a)(1); *City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325. It is clear in both the Proponent's Environmental Assessment to the CPUC and in the IS/MND that the Crystal Geyser plant is reasonably foreseeable consequence of the Lassen substation project. (See *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376; *Rominger v. County of Colusa* (2014) 229 Cal.App.4th 690.)

B2-2

"A light industrial bottling facility closed in December 2010, and seasonal loading peaks afterward reflect the loss of that load. However, a similar facility plans to begin operation in 2016 to bring summer and winter load peaks to 100 percent of the seasonal loading capabilities of the transformer, with the connection of 3 megawatts (MW) of additional load in 2018."

Proponent's Environmental Assessment for the Application of PacifiCorp (U901 E) for a Permit to Construct the Lassen Substation Project; page 18

Consideration of the potential cumulative effects of both projects combined cannot be assessed until after the EIR on the Crystal Geyser Plant is complete (see Table 5.18-2 of the IS/MND). In "Aesthetics" both the upgraded power lines along South Old Stage Rd and the huge visual footprint of the enlarged Crystal Geyser plant will have a significant visual impact on this scenic and tourist oriented region. The new power poles will be 75 feet tall, substantially taller than the current poles. As such, a fair argument exists that the Project may have potentially significant aesthetic impacts, which requires the preparation of an environmental impact report. Under CEQA, it is the State's policy to "[t]ake all action necessary to provide the people of this state with . . . enjoyment of aesthetic, natural scenic, and historic environmental qualities. (Pub. Resources Code, § 21001(b). Thus, courts have recognized that aesthetic issues "are properly studied in an EIR to assess the impacts of a project. (*Pocket Protectors v. City of Sacramento* (2005) 124 Cal.App.4th 903, 928; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492; *Ocean View Estates Homeowner's Assn., Inc. v. Montecito Water District, supra*, 116 Cal.App.4th at 401; *National Parks & Conservation Assn. v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1360.)

B2-3

The expanded power lines along Old Stage Road and crossing Hatchery Lane will have a very significant visual impact on this gateway road to the historic Mount Shasta fish hatchery (established in 1888), the Sisson Museum, Lake Siskiyou and the roads into the Pacific Crest Trail region.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project



Views of the existing power line from Hatchery Lane facing South West.



Views of the existing power line from Hatchery Lane, West towards Old Stage Rd.

B2-3
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project



Views of the existing power line from Hatchery Lane facing North West.
New lines are proposed to be substantially taller and will be a significant aesthetic eyesore.

B2-3
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The Crystal Geyser plant is one of the most visible eyesores in the entire Shasta valley, visible from Mount Shasta wilderness area and from the mountains on the West side of the valley, such as the road to Castle Lake. Mitigation of this blight on our valued view shed is a hoped for result of the still uncompleted Crystal Geyser EIR.



View of Crystal Geyser plant from Spring Hill in Mount Shasta

Substantial evidence supports a fair argument that the Project may have significant impacts to aesthetics. We would strongly advocate that the power lines be placed underground to avoid the visual blight in the rural scenic area and city. The personal observations of nearby residents to the Project constitutes substantial evidence. (*Pocket Protectors v. City of Sacramento, supra*, 124 Cal.App.4th at 937.) Relevant personal observations of area residents on nontechnical subjects, such as traffic, land use conflicts, noise and aesthetics, qualify as substantial evidence for a fair argument. (*Id., Ocean View Estates Homeowner's Assn., Inc. v. Montecito Water District, supra*, 116 Cal.App.4th at 402;

The combined effects of these aesthetic harms must be considered together and not segmented.

We appreciate the opportunity to respond to this Draft Initial Study and Mitigated Negative Declaration.

B2-3
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter B2

We Advocate Thorough Environmental Review (W.A.T.E.R.)

**Bruce Hillman
December 22, 2016**

- B2-1** The commenter restates information from the Draft Initial Study/Mitigated Negative Declaration (IS/MND) indicating that the proposed project would serve the proposed Crystal Geyser bottling plant (Crystal Geyser project) on Ski Village Road. The commenter also states that it is premature to approve the substation prior to the approval of the Crystal Geyser project because the substation upgrades would be considerably different if the Crystal Geyser project is not constructed. The commenter does not, however, present any evidence as to why or how the proposed project would be considerably different in the absence of the Crystal Geyser project. Since the commenter presents opinion and does not raise substantive issues with the analysis or methodology of the IS/MND, no additional response is provided or required.
- B2-2** The commenter states that the California Environmental Quality Act (CEQA) requires that “an environmental evaluation must consider the ‘whole of the project.’” The California Public Utilities Commission determined that the proposed project is independent from the Crystal Geyser project and is not reliant on the Crystal Geyser project to function. For a more detailed discussion regarding the independence of the proposed project from the Crystal Geyser project, please see General Response 1 (GEN1).
- B2-3** The comment states that the potential cumulative effects of both projects cannot be assessed until the environmental impact report for the Crystal Geyser project is complete, and that the Crystal Geyser project will have a significant visual impact on the scenic and tourist-oriented project region. Also, the commenter states that because proposed power poles will be 75 feet tall, they will be substantially taller than existing poles and may result in a potentially significant aesthetic impact. The comment also states that “expanded power lines along Old Stage Road and crossing Hatchery Lane will have a very significant visual impact on this gateway road.” The comment provides photos of existing power lines visible from Hatchery Lane and states that substantial evidence (e.g., the observations of nearby residents) has been provided to support the claim that the project may have significant impacts to aesthetics.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Cumulative effects of the proposed project and effects of past projects, current projects, and reasonably foreseeably projects are addressed in Section 5.18, Mandatory Findings of Significance, of the Draft IS/MND. As discussed in Section 5.18.1(b), the proposed project would not have impacts that are individually limited but cumulatively considerable, and the combined impacts would not result in a cumulatively considerable impact to aesthetic resources.

Although nearby residents have submitted comment letters in regard to the IS/MND prepared for the proposed project, submitted “observations” typically consist of personal opinion and fail to provide rationale or evidence to support a significant aesthetic impact conclusion associated with proposed project features. “Substantial evidence” is defined in the CEQA Guidelines as “facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts” (14 CCR 15384(b)). Mere argument, speculation, and unsubstantiated opinion or narrative is not substantial evidence for a fair argument that a project may have a significant adverse impact (California Public Resources Code, Section 21082.2(c); 14 CCR 15384(a)); neither is the mere possibility of adverse impact on a few people, as opposed to the environment in general (*Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 734; *Banker’s Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego* (2006) 139 Cal.App.4th 249, 279 (effect of project on private views of a few adjacent homeowners does not constitute a significant effect on environment for purposes of CEQA)). Although relevant “personal observations of area residents on nontechnical subjects may sometimes qualify as substantial evidence” (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928), the “observations” of unnamed residents referenced in the commenter’s letter are vague, unsubstantiated opinion and therefore do not rise to the level of substantial evidence for purposes of CEQA (see *Porterville Citizens for Responsible Hillside Dev. v. City of Porterville* (2007) 157 Cal.App.4th 885, 903 (holding that “vague complaints” by residents about a possible impact on the overall aesthetics of the local area resulting from approval of a housing subdivision do not constitute substantial evidence)). Complaints, fears, and suspicions about a project’s potential environmental impact likewise do not constitute substantial evidence (*Joshua Tree Downtown Bus. All. v. Cty. of San Bernardino* (2016) 1 Cal. App. 5th 677, 690).

Further, the cases cited by the commenter, *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903 and *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, are both characterized by a clear and significant change to the existing environment and are therefore inapposite (*San*

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Francisco Beautiful v. City & Cty. of San Francisco (2014) 226 Cal.App.4th 1012, 1030 (distinguishing *Pocket Protectors* and *Ocean View* and holding that the telecommunications project, which proposed to place 726 metal cabinets on city sidewalks as part of fiber-optic network expansion, would not cause significant aesthetic impact because “such structures are already a ubiquitous feature of the environment”). For example, in *Pocket Protectors*, the proposed residential project was to be built on undeveloped land, in a manner inconsistent with zoning (124 Cal.App.4th at pp. 908-909, 911). In *Ocean View*, the aluminum roof at issue was proposed to cover a 4-acre reservoir and would substantially alter the views from public trails (116 Cal.App.4th at pp. 398, 401).

In contrast, here, 50- to 60-foot-tall transmission poles are already existing features in the landscape and are a routine presence in existing views of the area. Although the replacement poles would be approximately 25 feet taller than the existing poles, the replacement poles would have a similar vertical profile and would be installed at or near the location of the existing poles, thus avoiding the introduction of substantially new forms and lines to the landscape (IS/MND, p. 5.1-32). Similarly, the proposed new substation would be built 375 feet to the west of the existing substation and would include colors and components similar to those of the existing facility; therefore, unlike the residential development and aluminum roof at issue in *Pocket Protectors* and *Ocean View*, any changes to the existing physical environment would be negligible at best (IS/MND, p. 5.1-32).

Similar to the photos of existing conditions presented in the IS/MND, the photos provided with this comment depict the existing visual baseline in the project area and illustrate the tall scale and repeating vertical and horizontal lines of existing electrical transmission infrastructure. However, as discussed above, the fact that new replacement poles would display a taller vertical scale than existing poles would not result in a significant aesthetic impact. Such a statement and finding fails to consider the existing visual setting and the context in which the proposed project would be implemented. The Draft IS/MND discloses that existing wooden transmission line support poles would be replaced with “taller wooden poles” and that “additional conductor lines would be strung on the replacement poles.” The Draft IS/MND goes on to state that “the replacement poles would display a thin vertical profile similar to the existing poles and the increased structure height would not substantially alter existing views or create substantially stronger line contrast.” Visual simulations are provided in the IS/MND to support the analysis and the characterization of project

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

impacts to existing views and visual quality and character. Please refer to IS/MND Section 5.1, Aesthetics.

An MND may be overturned only if it can be fairly argued on the basis of substantial evidence that the project may have a significant environmental impact (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75). Where there is no substantial evidence included in the record contradicting the findings of the administrative agency, the agency's decision must be upheld. "Once a negative declaration is issued ... that decision is protected by concerns for finality and presumptive correctness" (*Snarled Traffic Obstructs Progress v. City and County of San Francisco* (1999) 74 Cal.App.4th 793, 797 (citing California Public Resources Code, Section 21167.2, and *Laurel Heights Improvement Assn. v. Regents of Univ. of Cal.* (1993) 6 Cal.4th 1112, 1130)).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter B3

From: [Vicki Gold](#)
To: [Lassen Substation Project](#)
Cc: [Michael Rosauer](#)
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 10:10:16 AM
Attachments: [Letters of Support.pdf](#)

December 23, 2016

RE:
Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project
Application No A.15-11-005

To: LassenSubstation@dudek.com
cc: Michael Rosauer <michael.rosauer@cpuc.ca.gov>

Hello Michael and Dudek Consultants,

In reviewing the MND for the Lassen Substation, I continue to question why the name of the Mount Shasta Substation has changed. It implies that the project is either in Lassen County or on Lassen Lane, neither of which is accurate. People continue to ask about this. Under 1-5. 2. Environmental Factors Potentially Affected:

Aesthetics is not even checked, just Biological Resources, Hydrology/ Water Quality and Hazards and Hazardous Materials.

In 5.1.3. There is therefore no mitigation suggested. *The community clearly feels this fails to consider the scenic value of the view sheds of our region.* The Volcanic Legacy Scenic Byway submitted a letter addressing the need to underground not just the Interstate 5 at Lake Street transmission/ distribution point, but all points in the viewshed. Tourists and locals use Lake Street, the historic Sisson Fish Hatchery and Museum on Hatchery Lane. All points on the route of the 1.5 mile 36 pole replacement project are sensitive areas. As was said at the hearing, those traveling to Castle Lake, the Siskiyou Campgrounds, Lake Siskiyou and the Mt. Shasta Resort have their views interrupted by the power lines that are already present.

You also mention in 4.6.3 that "Overhead to underground transition structures on both sides of the freeway (Jessie Street) would be replaced with new poles. However it is anticipated that they would have the same configuration, height and size as the existing structures and would be located in the same general location as the existing structures." Again, under grounding is far preferable for the entire project.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

I could not find references to the actual proposed heights of the new poles in the document. I called the office a week ago requesting this information and you promised to email a response or to call with the information. We understood that the pole heights would be 25 feet taller than at present and that those at the actual substation, (3 or 4) would be as tall as 90 feet. The additional thickness of the cable required to eventually accommodate 115kV will also be a visual blight.

In Figures 5.1-2 Hatchery Lane views North and East show impact of visuals and 5.1-3 on South Old Stage Road across the meadow toward the Eddy Range and 5.1-4 the View North from North Old Stage Road all have significant aesthetic impacts. *You actually state that "views of recreationists are not considered in this analysis in 5.1.13* under Sensitive Receptors as if the only Lake Siskiyou visitors with views considered are those at the lake, not en route or at the dam.

As you know in 5.1-17 you mention the Scenic Highways Element including the county. In 5.1-18 you reference the Mount Shasta General Plan Open Space Conservation Element OC-7.1 *Yet nothing is done to comply with undergrounding ordinances in place in both Siskiyou County and the City of Mount Shasta.*

In 5.1-20 you state less than significant impact on scenic resources, and in 5.1-22 state that the introduction of additional conductor wire and increasing the height of existing support poles would be less than significant with no mitigation offered. The 5.1-8 proposed and existing views provided by Dudek or the transmission lines do not provide an adequate comparison of the visual impacts to be expected by the project.

When you presented the Mitigated Negative Declaration to the community on the evening of December 7th on the first major snowfall of the year, I was actually surprised at the turnout. Forty people showed up and I assure you that each of us represented 10 additional people who would have come had it not been hazardous to drive in those conditions. *I appreciate that you made the trip. I request that as there are changes in the MND and hopefully it morphs into an EIR, that you will return to our community to present the details again under better weather conditions.*

Please respond to this request for identifying the actual heights and diameters of the poles. I believe several of us requested this detail in December 2015 in our first letters regarding the project.

From 2013 forward many of us have been requesting records under the Public Record Act from the City of Mt. Shasta, Siskiyou County Planning Department, the

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B3-8

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

EDA and from the CPUC. These records clearly document the connection with the Crystal Geyser Water Co/ Otsuka Pharmaceutical Holdings project. Without significantly increased power to the former Coca Cola plant, (which was an empty shell at start up, without a single piece of conduit in place), there would be a very different project, especially at full buildout, which is rarely discussed.

Crystal Geyser was cautioned by the public from the very beginning that an EIR would be necessary. More than 350 people appeared in March 2014 to protest the lack of proper environmental review. Crystal Geyser (and admittedly with support from the County and City officials and staffs) proceeded to move ahead rapidly in remodeling and retooling the facility with, what can only be described as, "abandon". It was clear that their intention was to ask for forgiveness rather than permission. *They were finally red-tagged by the Building Inspector when a new building was under construction without permits.*

It is bad enough to have to deal with the industrial pollution surrounding plastic manufacturing and the potential of contributing to the overloading of the capacity of the newly planned \$20 million wastewater treatment plant by sticky juices which will be dumped into the Sacramento River. *To have this multinational pharmaceutical conglomerate proceed with virtually no oversight is truly shocking to the community.* Your agency is just one more in the line of those either asleep or worse "in bed" with the foreign corporation.

The attached letters of support, especially Senator Dianne Feinstein's, clearly show the lobbying that was done in favor of bringing this industry to our area. This is a time of drought, global warming and new regulations surrounding water use at the domestic and municipal level. It is shocking that the water and beverage bottling industries are exempted from such regulations. We experienced 5 years of drought and snow drought as well here at the "area of source" of the Sacramento River. What may have appeared a good idea in the 1990's no longer has merit.

We even viewed emails from the executives of Crystal Geyser urging the city to connect their production wells to the municipal water system so they could avoid any CEQA process per Governor Brown's January 18, 2014 Executive Order. This is water privatization, an idea that has proven dangerous and expensive all over the world. Even the IMF studies indicate problems with this approach. This is a local manifestation of a global problem. To the extent that the CPUC allows only a Mitigated Negative Declaration before the Draft Environmental Impact Report prepared by Siskiyou County consultants is even published for review and comments, is clearly *putting the cart before the horse.*

No one is objecting to needed repairs to the substation. We are not opposing what is

B3-8
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

necessary to provide power to the community or to allow for reasonable growth. *But it is clear that the power required for the Crystal Geyser project is the driver of the expansion.* As mentioned in last year's letter, the wastewater treatment plant will eliminate the need for power to pump effluent up to Highway 89, which will be a huge power savings. The city and residents have installed LED lights, another source of power savings. Most new construction will be required to comply with best standards and practices to save power and water.

The need for this upgrade is largely based on needs of the primary beneficiary, Crystal Geyser, as indicated by many emails among their executives, Siskiyou County Planning Department, City of Mt. Shasta officials and staff, and CPUC. *The attempt to piecemeal the project is well documented.*

Please give full consideration to the very special environment of this community. Tourism is the main source sustaining us. One hesitates to imagine the many truck trips with traffic and road repair impacts, to say nothing of water and air pollution. In Weed where the Crystal Geyser Roxane plant operates, there are 100-200 trips generated daily. *The least we can do is avoid corporate welfare and require the multi billion dollar corporation to pay its own way and to underground all utilities to the plant, at least their share of the project. This is common sense.*

Thank you for considering the special nature of Mount Shasta.

Respectfully Submitted,

Vicki Gold
Water Flows Free
2102 Tanager Lane
Mt. Shasta CA 96067
530.926.4206

B3-8
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

WALLY HERGER
2ND DISTRICT, CALIFORNIA

PLEASE REPLY TO:
☒ WASHINGTON OFFICE:
242 CANNON HOUSE OFFICE BUILDING
(202) 225-3078

☐ DISTRICT OFFICES:
☐ 2635 FOREST AVENUE, SUITE 100
CHICO, CA 95928
(530) 893-8369

☐ 280 HEMLOCK DRIVE, SUITE 105
REDDING, CA 96002
(530) 223-5098
herger.house.gov



Congress of the United States
House of Representatives
Washington, DC 20515-0502

December 21, 2012

COMMITTEE ON
WAYS AND MEANS

SUBCOMMITTEES:
CHAIRMAN
HEALTH
TRADE

Matt S. Erskine
Deputy Assistant Secretary for Economic Development
U.S. Economic Development Administration
Herbert Hoover Building, Room 7822
Fourteenth Street and Constitution Avenue, NW
Washington, DC 20230

Dear Mr. Erskine:

I write to you today about an opportunity for the EDA to make a strategic investment in rural Northern California. As noted in the attached letter from Doug Maclean, CEO of the Crystal Geyser Water Company, the City of Mount Shasta has been selected as a site for a Crystal Geyser bottling operation. Crystal Geyser is currently in escrow for a mothballed facility that was previously operated by the Coca-Cola Company. However, the key barrier to the project is the wastewater capacity of the City of Mount Shasta. EDA could hold the key to bringing badly needed jobs to an area of chronically high unemployment.

I believe it is critical to note that the decline of the Siskiyou County economy is directly related to federal policies that have dramatically reduced timber harvests in the area. Timber production and processing had been the essential industry for decades, and it collapsed virtually overnight when the Northern Spotted Owl was deemed to be an endangered species requiring vast set-asides for habitat. The local economy has never recovered.

I have long believed that the federal government should particularly focus economic development efforts on areas that have borne the brunt of federal actions that harm the local economy. The Mount Shasta wastewater capacity improvement project is a perfect project for the EDA in that it will leverage significant investment already being made by the private sector and assist in a job creation project in an area that has been decimated by economic deterioration. I urge you to strongly consider the attached application for this project.

Sincerely,

Wally Herger

WALLY HERGER
Member of Congress

WH:dm



B3-9

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

DIANNE FEINSTEIN
CALIFORNIA



SELECT COMMITTEE ON INTELLIGENCE - CHAIRMAN
COMMITTEE ON APPROPRIATIONS
COMMITTEE ON THE JUDICIARY
COMMITTEE ON RULES AND ADMINISTRATION

United States Senate
WASHINGTON, DC 20510-0504
<http://feinstein.senate.gov>

March 18, 2012

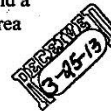
The Honorable Matthew Erskine
Deputy Assistant Secretary for Economic Development
U.S. Economic Development Administration
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Deputy Assistant Secretary Erskine,

I am writing to offer my strongest support for the County of Siskiyou's application to the Economic Development Administration grant program. If awarded, this grant will fund an expansion of the City of Mt. Shasta's wastewater system in order to accommodate a \$20 million investment by Crystal Geyser Water Company. This investment is critically important in Siskiyou County, where the current unemployment rate is 15.9 percent.

Crystal Geyser is pursuing the purchase of a dormant bottling facility in the City of Mt. Shasta that would become a value-added beverage bottling facility. The company is currently in escrow for the plant; however, a key barrier is the limited wastewater capacity of Mt. Shasta. This grant would support capacity improvements to 7300 feet of waste water lines and new wastewater treatment storage to accommodate the new bottling plant and future development. Crystal Geyser has agreed to pay for \$3 million of the estimated \$6 million required to upgrade the wastewater treatment facility. The company is also building an on-site power substation.

Siskiyou County and Crystal Geyser estimate that the project will create an initial 100 manufacturing jobs and an additional 100 jobs over the course of a ten year expansion plan. These new manufacturing jobs will have a significant impact on Mt. Shasta, which has been one of Siskiyou County's hardest hit communities during the recession. In 2010, the closure of a local water bottling facility and a long-term care facility at Mercy Medical Center resulted in the loss in 100 area



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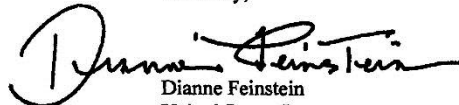
Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

jobs. This project would help to reverse the trend of job loss and prepare the area for future economic growth.

Siskiyou County has been working with the Seattle EDA Office, which is handling the application and has been supportive of the County's efforts. Crystal Geyser has expressed a strong interest in working with the City and County to ensure that the project can move forward. However, the window for approving the project is rapidly coming to a close, and the company may have to consider locating the project in another city or foregoing the expansion if funding for these improvements cannot be secured. I firmly believe that with assistance from EDA, Siskiyou County and Crystal Geyser can work together to ensure that this project can advance to create new jobs and support economic growth throughout the community.

Thank you in advance for your consideration of this request. Should you have any questions, please do not hesitate to contact T.C. Ostrander in my Washington, D.C. office at (202) 224-3841. Best regards.

Sincerely,


Dianne Feinstein
United States Senator

B3-9
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Response to Comment Letter B3

Water Flows Free

Vicki Gold

December 23, 2016

- B3-1** The commenter's objection to the project name is noted, and is included in the administrative record. It will be considered by the California Public Utilities Commission (CPUC) during deliberations for the project. However, the name of the substation is not a physical impact to the environment, so it is not a comment that can be addressed within a California Environmental Quality Act (CEQA) document. Since the comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration (IS/MND), no additional response is provided or required.
- B3-2** The commenter's observation regarding the environmental issue areas involving at least one impact that is a potentially significant impact is correct. Aesthetics is not checked because, as demonstrated in Section 5.1, Aesthetics, potential impacts to scenic vistas, damage to scenic resources within a state scenic highway, substantial degradation to the existing visual character or quality of the site and its surroundings, and day- and nighttime views in the area resulting from implementation of the proposed project were determined to be less than significant. As such, the IS/MND does not include aesthetics-focused mitigation.

The IS/MND considers the scenic value of the landscape and identifies multiple scenic vistas in the area. In Section 5.1.4(a), views from several locations from Interstate 5 (I-5) through the project area and views from local area roads, including North and South Old Stage Road, West Ream Avenue, West A Barr Road, Hatchery Lane, West Jesse Street, and Michele Drive, are considered in the scenic vista analysis and are evaluated for potential impacts. As mentioned by the commenter, existing power lines are visible in views from these roadways, and these elements are capable of interrupting the views of passing motorists. The IS/MND describes existing visual conditions of the landscape, including the presence of existing power lines that would slightly diminish aesthetic impacts associated with implementation of the proposed project. However, power lines and support poles are established features in the landscape; therefore, these elements contribute to the seen landscape in existing views and to the current visual character of the area.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

B3-3 The commenter provides an excerpt of Section 4.6.3, Underground Distribution, of the Draft IS/MND regarding overhead to underground transition structures, and the commenter states the opinion that underground is far preferable for the entire project. The commenter's preference is noted and will be included in the administrative record and considered by the CPUC during project deliberation. Since the comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND, no additional response is provided or required.

The proposed heights of replacement poles and structures at the proposed substation, including transmission and distribution poles, were identified in the Draft IS/MND. Please refer to Section 4.4.1, Substation, for a discussion of the heights of structures at the substation (the tallest structure at the substation would be approximately 40 feet tall), and Section 4.4.2, Transmission Line Upgrades, for a discussion of heights of replacement poles (generally 75 to 90 feet tall). Located 30 to 50 feet west of the fenced boundary of the substation, new guyed wooden poles would be between 80 and 90 feet tall and approximately 19 inches in diameter. The commenter's statement that the additional thickness of the cable will be a visual blight is noted and will be included in the administrative record and considered by the CPUC during project deliberation.

The commenter's opinion on the proposed project—and, more specifically, the significance of aesthetic impacts as demonstrated in Figures 5.1-2, 5.1-3, and 5.1-4 of the Draft IS/MND—is noted and will be included in the administrative record and considered by the CPUC during project deliberation. Please refer to Section 5.1.4(c), which presents the analysis on potential impacts to existing visual character or quality from Viewpoints 1, 2, and 3.

The views of recreationists at Lake Siskiyou, City of Mount Shasta Parks, and the Shasta–Trinity National Forest are not considered in the IS/MND's aesthetics analysis because the presence of intervening terrain and vegetation between these recreational areas and project components would screen or otherwise limit the availability of views to project components. The views of motorists are considered in the analysis, and, as noted by the commenter, motorists could include persons traveling to recreational areas and facilities in the surrounding area.

B3-4 Please see General Response 4 (GEN4) regarding the project and compliance with undergrounding requirements of local ordinances.

B3-5 The commenter states that Figure 5.1-8 does not provide an adequate comparison of the visual impacts to be expected by the project, but does not include specific

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- comments regarding the inadequacy of the figure images. Figure 5.1-8 presents an existing view and simulated view of project components (located approximately 0.25 miles away) from the northbound travel lane of I-5, approximately 0.35 miles north of the West Lake Street Overpass. As discussed in the IS/MND, Figure 5.1-8 and Viewpoint 3 present a representative view that is available to passing I-5 motorists and project area residents located within the middleground distance (i.e., 0.25 miles to 0.75 miles) of the existing 69-kilovolt transmission line.
- B3-6** The commenter requests that future changes to the project be presented to the community. Future public meetings would be at the discretion of the Administrative Law Judge and are outside the purview of the CEQA process.
- B3-7** Please refer to response to comment B3-3.
- B3-8** The commenter's information is noted and is included in the administrative record. It will be considered by the CPUC during project deliberation. Since the comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND, no additional response is provided or required.
- B3-9** The letters submitted are included in the administrative record and will be considered by the CPUC during deliberations for the project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Comment Letter B4

From: [Vicki Gold](#)
To: [Lassen Substation Project](#)
Cc: [Michael Rosauer](#)
Subject: Project Application No A.15-11-005
Date: Friday, December 23, 2016 3:46:57 PM

Hello Michael and Dudek Consultants,

This is an addendum to my earlier letter. It involves EMF's. It is my understanding that Health & Safety statutory regulations mandate analysis of health impacts. Is it not true that undergrounding of utilities significantly reduces the EMF's surrounding poles and transmission and distribution lines? I was informed that Code 451 requires that impacts of new electric fields in back yards must be addressed. I understand that under grounding is more expensive, but in our community it must be considered.

Several friends have reported that when residing in pristine quiet locations, they can actually hear the hum or buzz from power lines from as great a distance as 5 miles in quiet locations. Yes, this is near I-5, but the noise pollution is not insignificant, especially during the very quiet snowy season of which we all hope to see more. This year ended the snow drought for the first time in 5 years and we are grateful.

Please add considerations of EMF's and noise generated by the upgraded lines to my comments.

Respectfully Submitted,

Vicki Gold
Water Flows Free

B4-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter B4

**Water Flows Free
Vicki Gold
December 23, 2016**

- B4-1** The commenter raises concerns regarding the impacts of EMF (electromagnetic frequencies). Section XI of the Application for a Permit to Construct addresses the measures taken to reduce EMF exposure in accordance with the California Public Utilities Commission’s “no cost” and “low cost” magnetic field reduction measures, and the analysis supporting these measures is provided in Appendix C of the application. EMF effects are assessed as part of the wider Permit to Construct, and are not assessed as part of the Draft Initial Study/Mitigated Negative Declaration. As such, no further response is needed or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter B5

From: [D. La Forest](#)
To: [Lassen Substation Project](#); [LaForest](#); [Vicki Gold](#)
Subject: Comments on IS/MND for Lassen Substation project
Date: Friday, December 23, 2016 4:52:14 PM
Attachments: [MST's PROTEST of PacifiCorp's Lassen Substation -A1511005- 12-7-15 - amended 1-31 PDF-A.pdf](#)

On behalf of Mt. Shasta Tomorrow, I am resubmitting the attached comments that mostly are applicable to the current Project and its IS/MND.

I submitted these comments previously on 12-7-16 to the CPUC as a Protest to this Project's PEA but apparently these concerns were not shared with the CPUC staff, including Michael Rosauer. At a recent meeting held in Mt. Shasta, I again gave him a copy of these comments.

The undergrounding of the expanded powerlines near the Lake Street overcrossing has changed, so these comments are not entirely relevant on that point a year later.

Thank you, and please contact me if you have questions.

Dale La Forest
Director - Mt. Shasta Tomorrow (non-profit corporation)

101 E Alma St.
Mt. Shasta, CA 96067

B5-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of PACIFICORP (U 901 E),
an Oregon Company, for a Permit to Construct the Lassen
Substation Project Pursuant to General Order 131-D.

Application 15-11-005
(Filed November 2, 2015)
(~~Filed December 7, 2015~~)

AMENDMENT TO PROTEST OF MT. SHASTA TOMORROW
TO APPLICATION OF PACIFICORP (U 901 E), AN
OREGON COMPANY, FOR A PERMIT TO CONSTRUCT
LASSEN SUBSTATION PROJECT PURSUANT
TO GENERAL ORDER 131-D; WITH ATTACHMENT 1

B5-1
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December 7, 2015

Mt. Shasta Tomorrow
101 E. Alma Street, Suite 100-A
Mt. Shasta CA 96067
Tel: 530.918.8625
E-mail: mtshastatomorrow@excite.com

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of PACIFICORP (U 901 E),
an Oregon Company, for a Permit to Construct the Lassen
Substation Project Pursuant to General Order 131-D.

Application 15-11-005
(Filed November 2, 2015)
(~~Filed December 7, 2015~~)

AMENDMENT TO PROTEST OF MT. SHASTA TOMORROW TO APPLICATION OF PACIFICORP (U 901 E), AN OREGON COMPANY, FOR A PERMIT TO CONSTRUCT LASSEN SUBSTATION PROJECT PURSUANT TO GENERAL ORDER 131-D; WITH ATTACHMENT 1

Introduction

In accordance with Rule 2.6 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure ("Rules"), MT. SHASTA TOMORROW submits this protest to the Application of PACIFICORP (U 901 E), an Oregon Company, for a Permit to Construct Lassen Substation Project Pursuant to General Order 131-D ("Application").

This Protest is amended only to include Attachment 1 with the Protest so that Attachment 1 is included on the record. Attachment 1 was erroneously omitted from simultaneous filing of the initial Protest, but both documents were served together. Attachment 1 was mentioned in Protest on page 6. No changes have been made to the Attachment 1 since it was originally served.

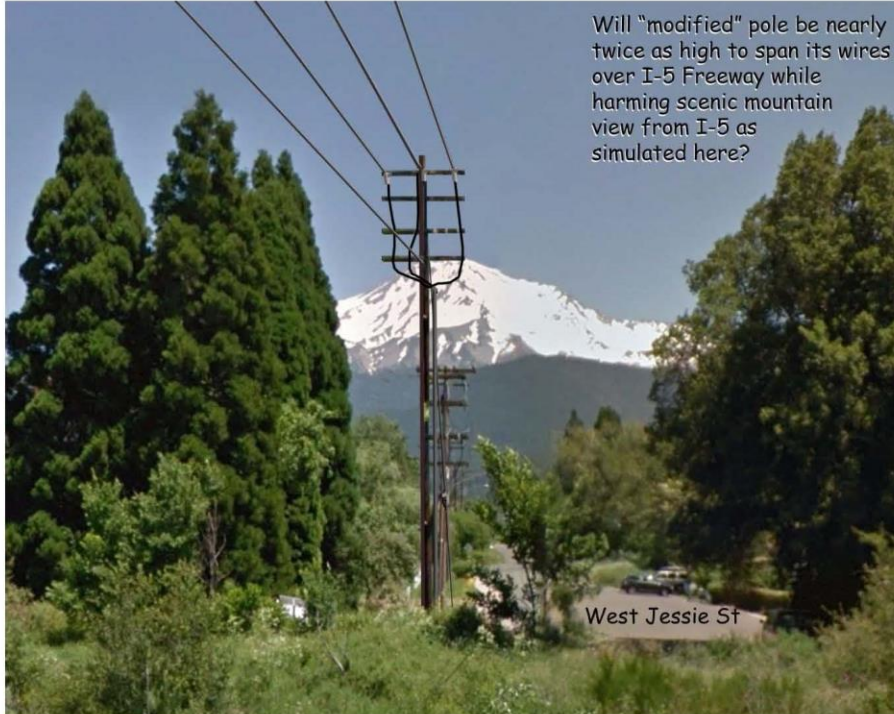
I. INTEREST IN THIS PROCEEDING

MT. SHASTA TOMORROW, a California non-profit public-benefit corporation whose members live in the Mt. Shasta area, states there are serious flaws in the Proponent's Environmental Assessment that PacifiCorp submitted for review. The PEA fails to acknowledge, identify and mitigate some of this Project's significant environmental impacts regarding its climate-change impacts, aesthetic impacts, and noise impacts within the Mt. Shasta community. As a result, members of Mt. Shasta Tomorrow will likely be harmed if this Project proceeds as proposed and without adequate environmental review and effective mitigations.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

For example, this is just one of this Project's potentially harmful visual impacts it may cause to a scenic view from Interstate-5 highway, designated as a Volcanic Legacy Scenic Byway:



B5-1
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II. COMMUNICATIONS

All correspondence, pleadings, orders and notices to this proceeding should be directed to the following:

MT. SHASTA TOMORROW
101 E. Alma Street, Suite 100-A
Mt. Shasta CA 96067
Telephone: 530.918-8625
mtshastatomorrow@excite.com

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

III. PROTEST

In support of its Protest, MT. SHASTA TOMORROW states the following:

In the news recently, Volkswagen has suffered very bad press due to its company having rigged the emission controls of millions of cars it sold, resulting in excessive air pollution, causing adverse health risks and climate change impacts as well as defrauding its customers. Not entirely unsimilar, PacifiCorp also appears to be attempting with its so-called Lassen Substation Project to generate undisclosed and serious greenhouse gas emissions and to deceive the public about its environmental impacts also related to climate change. In both instances, regulators who oversee how such corporations do business need to carefully protect the public's interests. For this reason, we file this protest with the CPUC about serious deficiencies in the PEA.

PacifiCorp's *Proponent's Environmental Assessment* employs an unlawful tactic to accomplish these power upgrades more cheaply and with less environmental regulation, something called "project segmentation" or "piecemealing." But *piecemealing* is illegal under CEQA.

"CEQA forbids 'piecemeal' review of the significant environmental impacts of a project. (*Citation omitted*) Agencies cannot allow 'environmental considerations [to] become submerged by chopping a large project into many little ones — each with a minimal potential impact on the environment — which cumulatively may have disastrous consequences.'" ¹

But this piecemealing is happening with PacifiCorp's PEA. The PEA pretends that the Project is in the public interest, but it essentially wears blinders to the bigger picture by failing to identify how Crystal Geyser Water Company is a major industrial customer that has pressed for these power supply upgrades. There is no direct mention within the PEA of Crystal Geyser's involvement other than this company's name on one aerial photograph at the end of a new enlarged power line. The consequence of such piecemealing is that the PEA ignores serious direct and indirect environmental impacts. Those should be analyzed and be mitigated by Crystal Geyser, and not be evaded entirely while the costs of the powerline upgrades are borne by the ratepayers in general.

¹ See *Banning Ranch Conservancy v. Superior Court* (2015) 236 Cal.App.4th 1341 (Review granted by Calif. Supreme Court, but this same principle has been established in numerous court cases beforehand); <http://www.courts.ca.gov/opinions/documents/G049691.PDF>

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Let the honorable Japanese people who own Crystal Geyser Water Company and who will most benefit from this powerline and substation enlargement pay for its cost.

The consequences of the entire project (Crystal Geyser's bottling plant and its powerline enlargement) must be evaluated now at the earliest opportunity. For example, if done later, the visual impacts of Crystal Geyser's powerline expansion (a more accurate Project name than "Lassen Substation") cannot be reviewed and mitigated when Crystal Geyser prepares a separate environmental study in the future. It will be too late then once the powerline and substation are installed, once the CPUC has accepted the proposed conditions, and the separate public review period under CEQA for the Lassen Substation has expired. It will be too late to mitigate the significant climate change impacts associated with operation of a larger powerline supplying more power than before, and too late to mitigate the aesthetic impact of larger and more above-ground power lines.

From this point forward in this protest letter, we refuse to participate in this piecemealed charade intended to deceive the public about this project's environmental consequences. Instead we will refer to the *whole of the project* as the "PacifiCorp/Crystal Geyser Project." (See additional comments about piecemealed project review in attached Appendix "B").

I. EIR IS REQUIRED TO EVALUATE PROJECT'S ENVIRONMENTAL IMPACTS

CEQA requires that the CPUC prepare an EIR for such a project if any of its various environmental impacts have not been mitigated to a less-than-significant level. While PacifiCorp claims in its self-serving *Proponent's* Environmental Assessment that all such environmental impacts would be less-than-significant, the facts already disclosed prove otherwise. In some cases, the PEA jumps to conclusions of less-than-significance without ever providing the required evidentiary basis, facts or analysis to support such determinations. Neither the CPUC, the public, nor any reviewing court can review the adequacy of such determinations if the PEA and subsequent CPUC environmental review is lacking in that evidentiary and analytic support. This

B5-1
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

protest letter will demonstrate why an EIR is required. PacifiCorp is incorrect to suggest that a short-cut called a *Mitigated Negative Declaration* will be sufficient.²

In summary, the PEA fails to comply with the California Environmental Quality Act in these ways:

A. Project's Climate Change Impacts Will Be Significant Due To Greenhouse Gas Emissions From Crystal Geyser's Operations That Will Be Directly and Indirectly Enabled By PacifiCorp's Electric Power Line Upgrade

The entire Earth is facing a crisis of anthropogenic climate change and global warming. Such planetary damage is due, in part, to world-wide burning of excessive amounts of fossil fuels. California requires project applicants to evaluate the climate change impacts of their projects during CEQA review, but PacifiCorp has not entirely gotten the underlying message. What the PEA presents is only part of the picture. The PEA entirely fails to address the major emissions from this PacifiCorp/Crystal Geyser Project's enlarged substation and conductors that would supply vast amounts of greenhouse gas-associated electricity to Crystal Geyser, and would thence facilitate Crystal Geyser's long-distance trucking of such bottled beverages. Those significant, indirect CO₂e³ emissions and their off-site environmental impacts are not even mentioned or evaluated in the PEA.

This PEA should not be allowed to solely discuss some vehicle emissions occurring temporarily while PacifiCorp builds the substation and installs new wires and enlarged towers. PacifiCorp's PEA claims the greenhouse gases to be emitted from just the substation Project will be less than 10,000 metric tons per year of CO₂e emissions and will therefore be less-than-significant. But the

² PacifiCorp attempts to avoid an EIR; see PEA, p. 2: "Because all Project impacts are less than significant or less than significant with implementation of the APMs listed in this PEA, it is anticipated that the CPUC would be able to prepare a Mitigated Negative Declaration (MND) for its review of the Project under CEQA."

³ CO₂e, or carbon dioxide equivalent, is a standard unit for measuring carbon footprints. The idea is to express the impact of each different greenhouse gas in terms of the amount of CO₂ that would create the same amount of warming.

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

PEA does not also evaluate Crystal Geyser's construction and operational emissions that these electric power system upgrades will facilitate.

Crystal Geyser has requested that Pacific Power upgrade its power lines because Crystal Geyser needs to use at least 10 megawatts more electric power than previous bottling companies used at that location.⁴ Generating that additional electric power will require the use of countless tons of carbon-based fuels to be burnt somewhere else. But if those related, indirect emissions are not evaluated in this PEA, when will they be evaluated? Will those emissions be analyzed or mitigated at all if not now in the PEA and in CPUC's possible EIR? Instead, the PEA inexplicably asserts on pages 225-226 that *"the proposed Project's operation would not require the combustion of fossil fuels; therefore, the proposed Project's cumulative impact on GHG is less than significant."* How will power be generated to operate this Project's infrastructure, as well as supply the Crystal Geyser's plant, without some significant amounts of fossil fuel use?

The PEA fails to provide the public with any estimation of the amount of such greenhouse gas emissions from off-site power generation that the large substation and enlarged power lines will transmit to Crystal Geyser's plant. The PEA however sets a threshold of significance of 10,000 metric tons per year of CO₂e emissions. Under this standard, the PEA assumes if this PacifiCorp/Crystal Geyser Project emits more CO₂e emissions than that per year, its greenhouse gas impacts will be considered significant. But the PEA provides no estimates of such indirect greenhouse gas emissions.

In the absence of critical data for public review, we are forced to look elsewhere for similar information. Some information is available on greenhouse gas emissions from a Final EIR prepared in about 2008 for a once-proposed water bottling plant to be built by Nestle in nearby McCloud, California. Nestle's Final EIR claimed that its McCloud bottling operation would have emitted over 65,000 metric tons per year of CO₂e. Nestle was planning on using much less electric power per volume of bottled water than Crystal Geyser is now seeking because Nestle did not need to boil water to brew teas or use electricity to subsequently cool down its huge building.

⁴ (See **Attachment 1** for some Crystal Geyser's email correspondence seeking such electric power upgrades).

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Nestle underestimated its long-range heavy trucking GHG emissions because it calculated CO₂e emissions from its heavy trucks only as they traveled the 19 miles to the edge of Siskiyou County. In Crystal Geyser's scenario, its trucks will haul loads hundreds of miles farther. Its actual greenhouse gas emissions will be considerably more than Nestle's prediction once Crystal Geyser's average trucking distance of hundreds of miles to major population centers is evaluated, and once its CO₂e emissions from brewing operations and increased air conditioning is added.

Crystal Geyser's 146,000 square feet of area in its current bottling plant at Mt. Shasta will be about 1/7 the size of Nestle's 1,000,000 s.f. facility would have been. So it is reasonable to roughly estimate some of Crystal Geyser's GHG emissions as: $1/7 \times 65,000$ metric tons per year, which is over 9,000 metric tons per year to be emitted just here in Siskiyou County. That CO₂e number would rise much more when those other truck shipment miles are counted as delivery and supply trucks travel hundreds of miles to Crystal Geyser's final distribution centers. Once the additional GHGs resulting from energy-hungry brewing operations and increased air conditioning use are added, the total annual GHG emissions would significantly exceed the PEA's threshold of significance of 10,000 metric tons per year of CO₂e. This is a fair argument based on substantial evidence that the PacifiCorp/Crystal Geyser Project will create significant greenhouse gas emissions.

Accordingly, the PEA's analysis fails to comply with CEQA by not acknowledging that the PacifiCorp/Crystal Geyser Project's conveyance of power to Crystal Geyser's plant will generate significant GHGs just from Crystal Geyser's ultimate operations, not counting the GHGs to be emitted when initially rebuilding and enlarging the substation and power lines.

B. Project's Aesthetic Impacts Will Be Significant Due Inconsistency with City of Mt. Shasta Zoning Ordinance, General Plan and Municipal Code's Visual Resources Protection Regulations .

CEQA Guidelines Appendix G, Impact X(b) for *land use planning*, as well as the PEA on page 173, requires the CPUC to evaluate whether this PacifiCorp/Crystal Geyser Project would:

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

The PEA responds inaccurately to this question on page 173 by asserting "no impact." As demonstrated below, the Project is inconsistent with some provisions in the City's Zoning Ordinance, its General Plan, and its Municipal Code in that it poses increased visual hard due to its proposing a new overhead powerline above the Volcanic Legacy Scenic Byway (I-5 Freeway) with taller power poles near this roadway in line-of-sight of Mt. Shasta's peak.

1. Project Conflicts with City's Zoning Ordinance and Municipal Code

The land west of the I-5 Freeway within the City of Mt. Shasta where much of this Project's transmission lines would be enlarged is zoned "U" for the "Unclassified" zone. The PEA however misconstrues whether this Project is consistent with restrictions for that "U" zone when on page 182 it writes: *"The U zone is consistent with all land use classifications of the General Plan."* That statement does not mean that this Project is consistent with the General Plan. It means the zoning category "U" is potentially consistent with General Plan land uses if the City has first approved a "conditional use permit" for such land uses. The City has not approved any conditional use permit for this Project though, and before this Project could be built, such a conditional use permit would be required.

The PEA is however inaccurate to claim that this Project would not require a conditional use permit where it states:

"The Unclassified Zoning District does not specifically address transmission or distribution lines. **The transmission and distribution line upgrade would not require a use permit or a conditional use permit** (personal communication with Keith McKinley, City of Mt. Shasta Planner, October 17, 2011)."

(emphasis added.)

That statement is inaccurate and without logical support. The City of Mt. Shasta Zoning Ordinance does not allow for such 115 kV high voltage transmission lines to be placed anywhere in the City in any designated zone without a conditional use permit. For example, the "U" zone

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

also does not specifically address tanneries, automobile race tracks or even nuclear power plants, but any one of those would certainly not be exempt from a conditional use permit.

Even on land zoned R-L for Resource Lands or on land zoned R1 for low density residential, a conditional use permit would be required for quasi-public facilities such as transmission lines considering the specific characteristics of this Project's high-voltage transmissions lines.

The Project's power lines are not an accessory use for a project to be located on that land with approval of a conditional use permit so they cannot be permitted as an accessory use.

Furthermore, Mr. McKinley is no longer the City's Planner and his statement quoted in 2011 is irrelevant to this new Project that largely serves Crystal Geyser. Crystal Geyser apparently first approached Pacific Power in 2013 for this PacifiCorp/Crystal Geyser Project power upgrade after Mr. McKinley had resigned as the City Planner, so his prior opinion two years earlier did not cover the new and unexpected set of circumstances this Project proposes.

The City does not permit structures to be 90 feet tall or somewhat higher as these power poles are proposed. If PacifiCorp wishes to install taller poles, it must at least first secure a conditional use permit, assuming that taller poles are even allowed by Municipal Code § 12.03.010 that allows exceptions to height requirements for specific structures. It is unclear that a long row of dozens of high voltage power poles is similar enough to any structures listed in the City's Zoning Ordinance to even potentially be eligible for such an exception however. In any case, there is nothing in the City's Municipal Code that allows pole heights to be either unlimited or as high as 90 feet or more as proposed.

The PEA fails to comply with CEQA by not revealing these conflicts with the City's Zoning Ordinance and Municipal Code.

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

2. Project Conflicts with City of Mt. Shasta's General Plan:

The PEA incorrectly concludes that this Project is consistent with the City of Mt. Shasta's General Plan.

But as demonstrated below, this Project would harm views of scenic resources in the Mt. Shasta area with taller high-voltage power poles visible from a major Volcanic Legacy Scenic Byway, with new power lines to be stretched overhead above this I-5 Freeway, and with new power pole modifications and power transformers in close view by tens of thousands of people who traverse this major interstate highway on average every day. The Project is inconsistent with General Plan policies and measures in several significant ways:

a. Project is Inconsistent with General Plan Implementation Measure OC-7.1(a) Meant to Reduce Visual Impacts.

The City of Mt. Shasta's General Plan has Goal OC-7 to protect the scenic resources of the Mt. Shasta area. One way it implements that goal is with Implementation Measure OC-7.1(a) to:

"Locate new development outside of scenic vistas and off of prominent slope exposures and ridge lines, except when land in such areas is specifically zoned and planned for development, in which case special design standards shall be required to reduce visual impacts."
(bold emphasis added.)

A "scenic vista" has been defined by PacifiCorp as: "*A scenic vista is considered an open and expansive public view encompassing valued landscape features including ridgelines and mountains.*" ⁵

However, the current PEA fails to even acknowledge the existence and applicability of the City of Mt. Shasta's Implementation Measure OC-7.1(a). Without explanation, PacifiCorp has withheld this applicable rule from its listing of local restrictions in the PEA on page 65.

B5-1
Cont.

⁵ Source: 2007 Draft Mitigated Negative Declaration, p. 2.2-11, for PacifiCorp's Morrison Creek Substation Project

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

This measure OC-7.1(a) is applicable to the Project because (1) taller power lines and poles are new development, (2) their location is not outside of scenic vistas, and (3) because the land they sit on is not zoned for such development.

- (1) The dozens of proposed new, taller, bulkier power poles up to 90 feet or more high with more visible powerline conductors than currently exist are one component of "new development." This is especially true because they would provide new levels of power to the new Crystal Geyser bottling plant.
- (2) The locations of many new power poles would be mostly within a **scenic vista** area with prominent exposure to the general public. This area meets PacifiCorp's definition of an *"open and expansive public view encompassing valued landscape features including ridgelines and mountains."* The Interstate-5 highway is designated the Volcanic Legacy Scenic Byway. That visual quality and designation is recognized within the City of Mt. Shasta's General Plan, p. 5-25, as well as by the Federal Highway Administration. The County's General Plan also contains policies to protect this scenic route. This Scenic Byway is a scenic vista from which tens of thousands of people per day pass through. This Scenic Byway is also within the City of Mt. Shasta where some of this Project's additional new overhead power lines are proposed to be constructed very visibly as they cross directly over Interstate-5.
- (3) The land under many of the new power poles is not zoned to allow by right such new development. The 29 acres of land west of the I-5 Freeway is currently owned by C.D.M.S., Inc. This land is not specifically zoned for any commercial or industrial development that these power lines would mainly service; rather this land is zoned "unclassified." This land cannot be developed with these power pole changes due to restrictions in the City's Municipal Code as discussed below. While the existing power poles and high voltage conductors predate the new restrictions and of course can continue there, PacifiCorp has no right to enlarge them in such a visible way as is being proposed without special approvals it has not officially sought.

Accordingly, this General Plan Implementation Measure OC-7.1(a) requires that PacifiCorp locate these new power lines and taller poles elsewhere outside of the Volcanic Legacy Scenic Byway.

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The PEA fails to comply with CEQA for its failure to identify this inconsistency with a local regulation, and its failure to identify this inconsistency as a potentially significant visual impact.

Therefore PacifiCorp is required to find some other location for any overhead visible power lines which would affect the scenic vista within the Volcanic Legacy Scenic Byway. PacifiCorp's complete omission of this relevant City law suggests that PacifiCorp is attempting to deceive the public and to evade the more costly consequences of undergrounding the powerline imposed by this City of Mt. Shasta Implementation Measure as well as by Implementation Measure OC-7.1(d).

**b. Project is Inconsistent with General Plan Implementation Measure OC-7.1(d)
Meant to Underground New Utilities to Reduce Visual Impacts.**

The PEA acknowledges the existence of Implementation Measure OC-7.1(d) that requires undergrounding of all new utilities where practical. But it goes no further to actually discuss this City regulation or measure. It doesn't discuss power line undergrounding nor whether undergrounding would be impractical. As such, the PEA fails to comply with CEQA's requirement to evaluate whether this Project may conflict with any applicable land use policy adopted to avoid visual impacts.

Implementation Measure OC-7.1(d):

Require undergrounding of all new utilities wherever practical. Encourage other agencies and entities to underground their facilities. Where undergrounding is impractical, aboveground lines shall be located to minimize impacts on sensitive scenic areas.

To repeat because this point is important, the PEA fails to show that undergrounding the power lines is impractical; in fact, some sections of the power line as proposed near I-5 at Kingston Road, near the new substation and near Crystal Geyser's plant will be undergrounded. The PEA also fails to show that the power lines are located to minimize their impacts on the Volcanic Legacy Scenic Byway.

If anything, PacifiCorp will make existing scenic impacts caused by its power lines worse by removing an existing underground power line beneath I-5 just south of the central Mt. Shasta freeway exits and replacing it with a set of new overhead power lines just north of those freeway

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

exits. There is no evidence in the PEA that PacifiCorp has attempted in any way to comply with the City's policies to protect the world-class, outstanding scenic qualities of views of Mt. Shasta and Mount Eddy in the vicinity of the Project.

The PEA also fails to analyze if relocating aboveground lines is impractical to minimize their impacts on sensitive scenic areas. That too is a provision within Measure OC-7.1(d).

Accordingly, PacifiCorp has made no attempt whatsoever to address this particular local law. It hasn't even argued that undergrounding is not practical. This failure violates CEQA because CEQA Guidelines § 15063(d) requires an Initial Study (including this Proponent's Environmental Assessment) to evaluate whether a project is consistent with local land use controls. All the PEA does in this respect is to selectively quote some applicable City of Mt. Shasta Implementation Measures, but then to drop the ball and fail to evaluate the Project's consistency with these regulations that are typically asked for in CEQA Guidelines Appendix G.

The only reasonable conclusion when City laws for viewshed protection are being ignored is that this Project's aesthetic impacts will not be "less-than-significant" as claimed by the PEA. There is no substantial evidence of a less-than-significant visual impact along this Volcanic Legacy Scenic Byway corridor. CEQA therefore requires that the CPUC prepare an EIR to better evaluate the aesthetic impacts of this PacifiCorp/Crystal Geyser Project.

3. PacifiCorp's Visual Impact Analysis on Scenic Views of Mt. Shasta is Seriously Defective and Fails to Comply With CEQA

The PEA's conclusion on page 76 that *"the Project would not compromise scenic views for freeway travelers"* is incorrect. Its statement that *"there are no scenic resources such as ... prominent topographic features that would be degraded due to the Project"* is also incorrect and without substantial evidence. Views of the peak of volcanic Mt. Shasta, an extremely prominent topographic feature that is the centerpiece for the community's tourist economy, would be degraded by the addition of the Project. The Project includes new overhead power lines above the I-5 Freeway, modified power poles near this Freeway, a new step down transformer atop one power pole directly in line-of-sight from the Freeway to the peak of Mt. Shasta, and dozens of

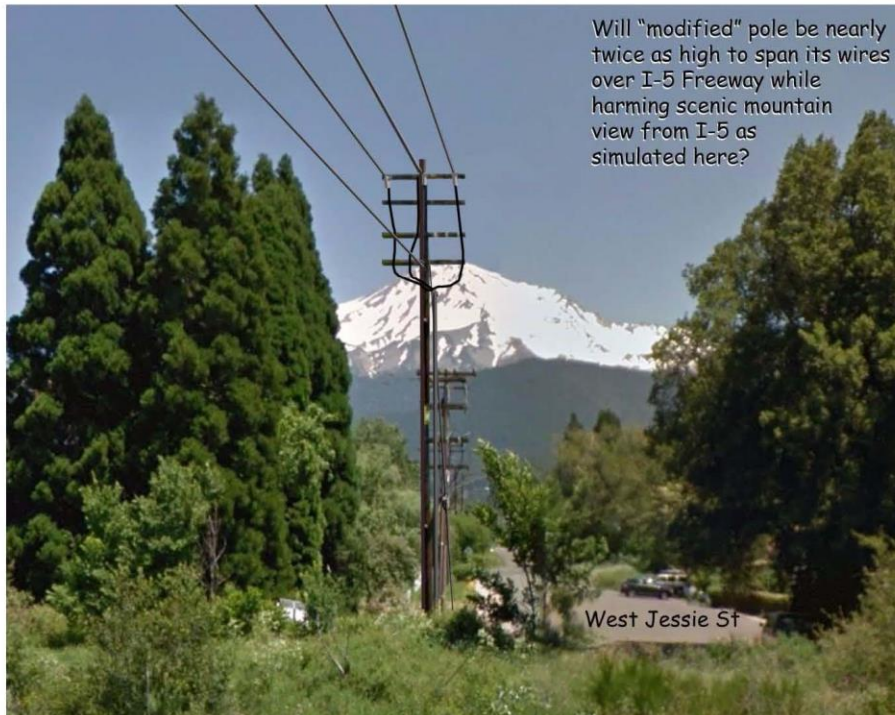
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

taller, bulkier power poles to the west. The PEA is disingenuous to claim that the Project's power lines would not be obvious from this highway.

a. The PEA Fails to Disclose the Significant Visual Impact of Newly Proposed Overhead Power Lines and Taller Power Poles and Transformer.

This picture below is a simulated view of this overhead power line part of this PacifiCorp/Crystal Geyser Project where it will connect to a modified power pole on the east side of the I-5 Freeway at the end of West Jessie Street:



B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

But this view or something else that simulates what may be constructed here is not found in the PEA.

While the PEA provides a few visual simulations for views of Project infrastructure, the only two I-5 Freeway views it provides, Viewpoints 6 (to the west) and 10 (to the north), are simply not sufficient in number or extent to support PacifiCorp's conclusions on PEA page 76 of a less-than-significant visual impact. Curiously, there is no visual simulation view to the east. **The PEA provides no visual simulations whatsoever to show views from this I-5 Freeway towards the Mt. Shasta peak where new power lines and modified poles will be visible!**

The PEA on page 76 appears to even attempt to hide the existence or location of the proposed *modified* power pole (pole number 162400) at the west end of West Jessie Street by calling it a "modified distribution structure." The PEA makes no mention of the distance this power line will span as it passes overhead above the I-5 Freeway. Nowhere does the PEA even disclose in what way that particular pole that is so visible from the I-5 Freeway will be *modified*. Will its height be greatly increased due to the need to span the approximate 520 feet⁶ distance across the Freeway to the power pole there on West Jessie Street without having the power lines sag too close to the ground when weighted down by winter ice? The PEA's map Figure 3-5C then misidentifies West Jessie Street by labeling it "Willow St." These problems are not evidence of good faith, full public disclosure and as such violate CEQA.

CEQA requires an Environmental Assessment to provide baseline data, such as in the case of power pole replacements, existing heights and diameters. The public is unable to independently evaluate whether the proposed Project's visual impacts will be significantly adverse without being given critical data upon which to assess the visual changes. One cannot tell if the visual simulations presented in the PEA are accurate or if the Project's visual impacts are being minimized with the use of erroneous photo simulations.

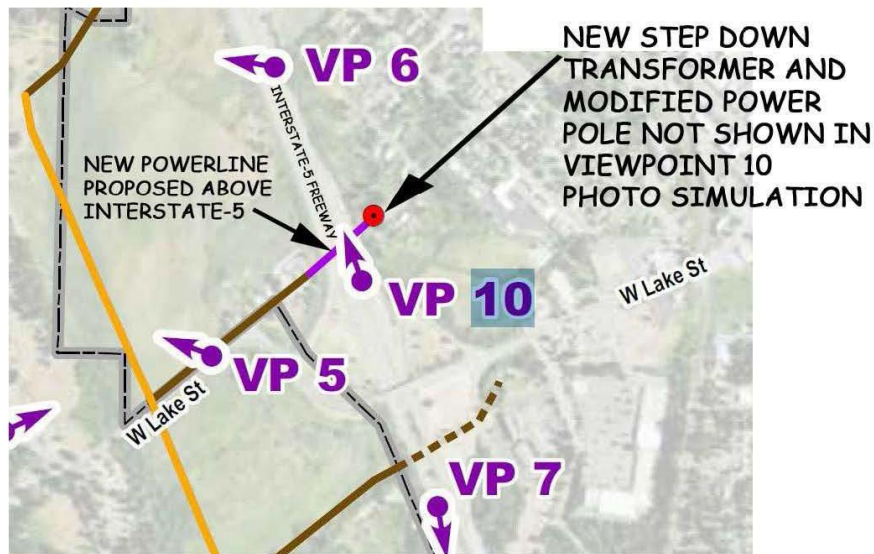
For example, in the PEA's simulated photo comparison for Viewpoint 10 (a view to the north from Northbound I-5), no new power poles are shown for the proposed New Overhead Circuit that will

⁶ Distance estimated using Google Earth's measurement tool.

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

pass above Interstate-5. (See PEA p. pdf-300) This map from the PEA shows where that new overhead power line would be located, so why isn't the power pole shown in Viewpoint 10?:



B5-1
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Many people may consider it to be an absurd failure when a power company with a vested interest in protecting its profits prepares an environmental assessment that ignores the most prominent visual feature (Mt. Shasta) that this PacifiCorp/Crystal Geyser Project might visually harm. Others might more suspiciously consider it an unethical cover-up to suppress damning evidence. In any case, the PEA's determination of less-than-significance regarding visual impacts is without substantial evidence absent this information.

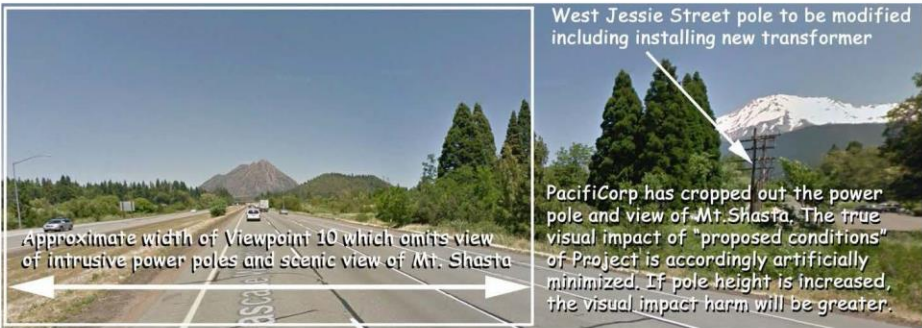
To demonstrate that failure, consider this view from the PEA's Viewpoint 10 (*on the next page*) that does not include northeastern views toward the Mt. Shasta peak:

Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project



B5-1
Cont.

Here below on the easily visible right side of northbound I-5 Freeway motorists' views is what the PEA hides from the public:



Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The taller power pole would obstruct a distant view of the scenic Mt. Shasta peak. No landscaping will effectively screen this tall, modified power pole from the highway in the foreseeable future because it is positioned at the edge of the I-5 Freeway right-of-way. Views of scenic vistas from this section of the freeway near this power pole are relatively unspoiled because the foreground lands have historically remained undeveloped since they contain a large acreage of wetlands. Because this roadway is an eligible State scenic highway, the aesthetic effect associated with the proposed Project could be significant.

This issue of protecting the aesthetic views from I-5 is very important because over 30,000 people per day travel along this "scenic highway" designated as the Volcanic Legacy Scenic Byway. One would think a power company would be careful when altering the scenic views in such a designated, high visual value corridor. But PacifiCorp's consultants have seemingly chosen instead to deceive the public rather than identify the problem, suggest mitigation or project alternatives, and have their client or Crystal Geyser ultimately pay the extra cost to protect this important view shed. What PacifiCorp is proposing is no more protective of the local view sheds than if this Project's setting was an ugly urban jungle with no visual protection whatsoever. Instead, the PEA includes a lot of boilerplate language about visual impact issues, but avoids the thorough research needed to analyze these impacts, and concludes that no significant problem will result.



COMPARISON OF EXISTING VIEW TO WHAT PACIFICORPS PROPOSES FOR PROJECT

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The PEA also fails to reveal what the newly proposed step down transformer will look like when mounted on the adjacent power pole above the ground. As such, the PEA does not evaluate the scenic impact such a glaringly visible transformer will look like at this location in front of scenic Mt. Shasta. The transformer poles and wires would not be significant if buried underground:

"Especially in ... scenic areas, visual impact is important. Undergrounding removes a significant amount of visual clutter. Overhead circuits are ugly."⁷

"In addition to improving the visual landscape, underground construction improves reliability."⁸

Page 321

These units are much larger than padmounted transformers, so they must be sited more carefully to avoid complaints due to **aesthetics**. The biggest obstacles are cost and **aesthetics**. The main complaint is that padmounted capacitors are ...

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The PEA does not disclose what such step down transformers will look like, and therefore cannot legitimately claim their visual impacts will be less-than-significant.

⁷ Electric Power Distribution Handbook, Second Edition, May, 2014, by Thomas Allen Short, p. 142.

⁸ *(Ibid.)* p. 140.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

**b. The PEA Fails to Disclose if There Will There Be Additional Visual Impacts
on Scenic Views of Mt. Shasta Due to Increased Sizes of Overhead Wires**

The PEA provides no visual simulation to reveal how this PacifiCorp/Crystal Geyser Project's enlargement of existing overhead power lines near the Lassen Lane freeway overpass will impact this scenic view of the peak of Mt. Shasta as seen in this photo:



PacifiCorp is proposing to reconductor the existing distribution lines above the freeway at this location. The PEA indicates this work will occur on both sides of pole # 160901 that exists on the west side of the I-5 freeway. (See PEA, Fig. 3-5B) This figure also includes the power lines extending to the east of the I-5 freeway seen in this photo above. The PEA however makes no mention of these overhead wires being altered, enlarged or the visual impacts that may result in its list on pages 32-33 of the PEA.

This issue is critical because this is a scenic corridor that the City wants to protect by removing overhead power lines, not enlarging existing ones. The PEA fails to describe how this PacifiCorp/Crystal Geyser Project's extra power will be transmitted to Crystal Geyser's plant where the overhead wires pass above the I-5 Freeway about 120 feet south of the Lassen Lane

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

overpass. There is no other way for that increased power to get from the west side of the freeway to the east side. Wires on both sides of the Freeway will be enlarged. But the PEA contains no description of what exactly will occur with this scenic location. It's as if the PEA describes there will be no changes to those four existing overhead wires even though Figure 3-5B shows a brown colored line representing a "reconductored existing distribution" line extending above the Freeway. The public, when faced with inconsistency like this in the PEA, is left to conclude that this visual impact will occur and that it will not be less-than-significant as the PEA concludes.

4. The PEA's Visual Impact Analysis of Prominent Mountain and Meadow Views to the West as Seen From the I-5 Freeway is Inconsistent and Deceptive.

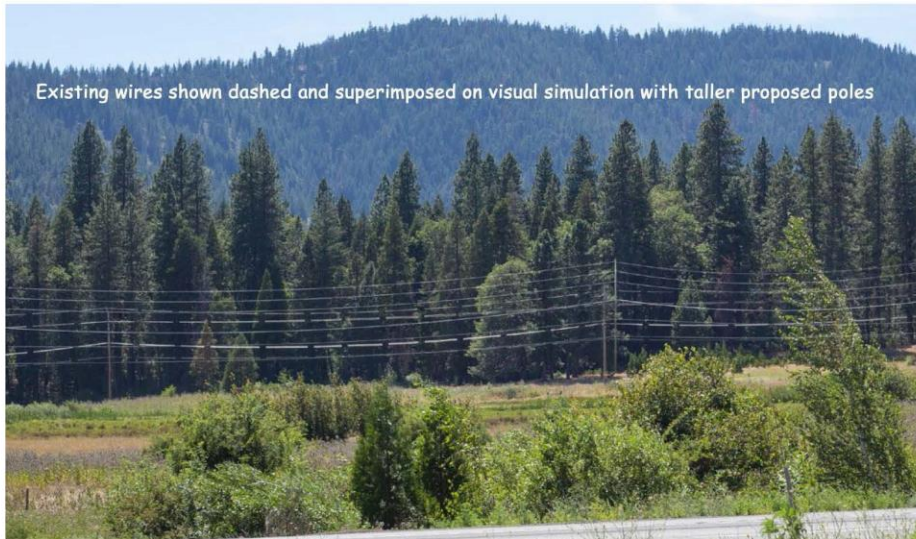
The PEA provides an "existing" and a "proposed" view of the new power poles and conductors seen to the west of the I-5 freeway. But in spite of the PEA's claims on page 62 that such visual simulations are *accurate* because they were prepared using a variety of sophisticated software programs, ordinary people can look at the visual comparisons as presented and with some effort see that the proposed Project views are neither accurate nor consistent with the text in the PEA.

CEQA requires that a Project Description must be consistent and accurate throughout an Environmental Assessment so that the public is not confused.⁹ A project description provides the analytic foundation of the environmental review. But in this Project's case, the PEA is not consistent in its description of the many new power poles and power lines to be installed west of the I-5 Freeway.

⁹ "An accurate, stable and finite project description is the *Sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 CA3d, 185, 193. The primary harm caused by shifts among different project descriptions is that the inconsistency confuses the public and commenting agencies, thus vitiating the usefulness of the process "as a vehicle for intelligent public participation." (*ibid.*, at 197-198)

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project



a. New Power Poles Appear May Be Significantly Higher Than Existing Poles:

PacifiCorp's P.E.A. claims the existing poles and proposed poles will both be 75 feet high, yet the visual simulation shows the proposed poles about **20% taller**. To make that comparison more clear, we have merged the photos in the PEA into a single image (above) and have dashed the existing power lines to show their relative height compared to the unbroken power lines as being proposed by PacifiCorp. We urge you to look carefully at the PEA's Viewpoint 6 comparisons on the otherwise unnumbered page PDF-299 of the PEA. If the newly proposed poles will be 20% taller than currently exist, that's a significant discrepancy between what the public has been repeated told in the PEA where the "maximum height of the new transmission poles would be 75 feet." ¹⁰

Elsewhere in the PEA but only once on page 31, the power poles are claimed to average between 80-90 feet tall, meaning some may be even taller than 90 feet. That correlates well with the

¹⁰ This claim of that the new poles would have a maximum height of 75-feet is made repeatedly in the PEA on pages 161, 210, and 243. Yet on page 31, they are inconsistently described having "an average height range between 80 and 90 feet".

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Viewpoint 6 simulation because a 90-foot pole is **20% taller** than a 75-foot pole. The visual simulation (illustrating approximately 90-foot high poles) is thus inconsistent with the PEA's text (75-foot high poles) where PacifiCorp misleads the public into thinking they will be the same height, and repeatedly makes that claim. That inconsistency between the text and what is shown in illustrations violates CEQA's requirement for a consistent project description.

b. Additional wires as Proposed will not have same or "less than significant" visual impact:

The existing power poles are illustrated with 4 wires and now carry 69 kV of power, but are designed as proposed to carry 115 kV of power with 6 wires. Yet the P.E.A.'s visual simulation shows the heavier power wires that will actually have a larger diameter conductors appearing smaller and less visually pronounced than the existing smaller wires. Either look at the merged illustration above or the PEA's Viewpoint 6 simulations to confirm this problem in the PEA with its accuracy of a project description. The dashed lines (existing) shown above are considerably more visually prominent than the new power lines (unbroken) that PacifiCorp is shown proposing. This possible error on the part of the PEA preparer may cause people to believe that the proposed Project will have a less-than-significant visual impact. But the evidence provided does not support that conclusion.

c. Poles will be larger in diameter, not narrower as shown:

The existing power poles are not described in the PEA as to their diameters. That failure to collect sufficient data to establish a "baseline" for visual impact comparison is a violation of CEQA. One cannot evaluate a project's aesthetic impact if such existing data is withheld like that. But from some measurements obtained near Hatchery Lane of these existing power poles, some of them are between 12" to 17" in diameter. The new proposed poles will be 19" in diameter and "bulkier" according to the P.E.A, p. 74. Yet the visual simulation shows the proposed poles appearing thinner than the existing poles, and not having an "increased bulk". That inconsistency in pole diameters in Viewpoint 6's simulation appears to be an error, or worse yet, an attempt to deceive the public about the true aesthetic impacts of these admittedly bulkier poles.

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- d. PEA misrepresents true Visual Impact of power poles and power lines by claiming they will not be in line of sight of motorists.

The PEA however underestimates the visual impact (p. 75) of the larger infrastructure by reaching a conclusion of a "less than significant" impact. But that conclusion that is not based upon factual evidence and analysis. The PEA states that such views of these poles and power lines would not be in the "line of sight of motorists." That possibly fraudulent claim by PacifiCorp may be intended to minimize the Project's visual impact. Of course the bulkier poles and more numerous, thicker wires will be in motorists' line of sight because motorists are anticipated to turn their heads in this Volcanic Legacy Scenic Byway to enjoy such views. Passengers also look around to the west.

5. The PEA's Visual Impact Analysis of the Project's Power Poles and Power Lines is Defective Where the PEA Claims They Will not Affect Scenic Views of Spring Hill or Black Butte.

The PEA underestimates this Project's visual impact to be caused by its overhead power lines and taller poles by inaccurately claiming that Spring Hill and Black Butte are not within or affect the Project's visual study area where it states:

"The City of Mt. Shasta General Plan's Open Space/Conservation Element (City of Mt. Shasta 2007) section identifies scenic landscape features and scenic viewshed areas within the city's planning area limits. It identifies scenic landscapes such as Mt. Shasta, Castle Crags, Mt. Eddy and Eddy Range, Rainbow Ridge, **Spring Hill**, Quail Hill and **Black Butte**. **None of these features are within or affect the Project's visual study area.** The General Plan also introduces a Proposed Viewshed Strategy to protect scenic resources in the city and maps notable viewshed areas. The Project study area does not fall within or affect the designated scenic viewshed areas."

(emphasis added.)

This statement that "none of these features are within or affect the Project's visual study area" is misleading and inaccurate. In the City's General Plan, beginning on page 5-25 (Scenic Areas)

B5-1
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

the Figure 5-6 "Scenic View Shed Areas" maps both Spring Hill and Black Butte as a "Scenic View Shed Area". This General Plan map identifies notable viewshed areas, primarily perceived from the City of Mt. Shasta. The previous Mt. Shasta General Plan, Fig. 19, also mapped Spring Hill as a "Scenic Viewshed".

The PEA is inaccurate because it defines the "visual study area" as within about 3/4 of a mile:

"The visual study area was determined by considering the distance at which potentially significant or adverse impacts would occur. This was based on the scale of the Project and its visual influence on viewers and the landscape. **This threshold, determined to be approximately 0.75 mile from the Project, ...**"

(emphasis added.)

Yet Spring Hill is within about 3000 feet of where the Project's power lines will cross North Mt. Shasta Blvd., a distance of much less than 0.75 mile. The PEA contains no viewpoint simulation along North Mt. Shasta Blvd. aimed towards Spring Hill of the Project's power line crossing street. Neither is Spring Hill's location labeled in the PEA. From where the power line crosses North Mt. Shasta Blvd., it is less than 3/4 mile (3,960') to Spring Hill. (i.e. about 3,000 feet.)

The PEA, p. 207, fails to note that there is a recreational trail leading to a scenic vista point atop Spring Hill that would have a view toward that Project's new larger power lines.

6. PEA fails to consider Project Alternatives of relocating newly proposed power lines underground.

The PEA never evaluated the Project's conflict with the City's policy to underground new power lines. As such, the PEA failed to also evaluate a project alternative where the expanded-capacity power lines creating significant visual impacts near the Freeway could be instead relocated underground. The PEA gives no explanation why such undergrounding would be infeasible. As such, the PEA fails to support its determination via its alternative analysis that the project's impacts will be less-than-significant.

"New aerial installations should be avoided in scenic areas where a feasible and prudent alternative exists. They should be considered only where:

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- Other locations pose unusual difficulty, are unreasonably costly, or are more undesirable from the standpoint of visual quality;
- Locating the utility underground is not technically feasible or is unreasonably costly; and
- The proposed installation can be made at a location and will employ suitable designs and materials that give adequate attention to the visual qualities of the area being traversed."

Source: "A Guide for Accommodating Utilities with Highway Right-of-Way", dated Oct. 2005, by the American Association of State Highway and Transportation Officials, page 4.

The PEA fails to comply with CEQA in this regards to considering project alternatives that may be capable of truly reducing these visual impacts to a less-than-significant status.

15.2.4 Route selection and line design in view of visual impact

15.2.4.1 Introduction

This clause reviews the subject of *visual impacts* of overhead lines, and how these impacts can be assessed and visualized. Some attention is given to evaluation principles and to the possibilities of minimizing **visual impact** in selecting the route for an overhead line and its design.

Apart from aspects of route selection, the size and shape of the overhead line supports and their components are considered as having the most significant influence on visual impacts of an overhead line. Therefore, efforts to reduce the visibility of these supports and their components or to increase their absorption by the landscape are considered most important in reducing the **visual impact** of a line.

Report [15.5] describes various methodologies for assessment for the **visual impact** of overhead lines in the landscape and has been used as a basis for preparing this clause. In recent years, a broad palette of assessment models has been produced ranging from detailed surveys supported by *photomontage graphics* to elaborate computer programmes which combine visual modelling techniques with rating methods. However, in the authors' opinion, there are doubts whether these models really contribute much to validate the placement of new overhead lines.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Routing guidelines

A large number and variety of guidelines have been developed with regard to routing [15.5]. Some generally applicable ones should be mentioned here.

- Avoiding natural parks and areas of high scenic, architectural or historic value. In any case, the line should be hidden, so as to minimize the **visual impact**.
- It is desirable to avoid open expanses of water and marshland. The overhead line should not go too close to shores of a river or natural lake. Rivers should be crossed as close to the right angle as possible.
- The most direct line with no sharp change of direction should be chosen with few angle supports only, these being placed where they are not too visible.
- In moderately open valleys with woods, the apparent height should be as low as possible and views of the line to be broken by trees minimizing the exposure of numbers of towers.
- In forested land, a sinuous cut or angle near important view points is preferable to a straight one so that people cannot see too far down the line.
- The line should follow natural lines created by topographic change, geology and vegetation that will help to minimize the **visual impact**.
- It is preferable to avoid breaking the skyline (see Figure 15.1).
- The towers should be placed near to the most vertical elements in the landscape, such as tree groups or hill slopes.

Structure allocation

Though technical and economic criteria are important in the selection of support heights and span lengths, evaluation of the **visual impact** may lead to the adoption of a different spotting of supports on the longitudinal profile of the line.

Support height has an important influence on **visual impact**, as the choice of taller structures will generate longer spans and reduced numbers of structures. However, taller supports have a greater presence in the landscape and are more conspicuous. Tall towers allow having the line suspended above the mature canopy height, thus avoiding the creation of corridors cutting through forests. Lower supports can be visually integrated with existing vegetation and topography as they are easier to visually absorb. However, the number of supports will increase, because span lengths need to be reduced.

Although, selection of structure sites depends on local conditions and constraints on available locations, some generally applicable guidelines can be given.

- When crossing over the top of a hill or mountain, the use of lower supports rather than higher ones should be considered (see Figure 15.2).
- When crossing a flat landscape characterized by a wide visual field and a clear organisation of land pattern, it is preferable to use taller towers with longer span lengths.
- In complex, picturesque landscapes, support heights should be adjusted to avoid intruding into the skyline and be absorbed into the background, thus the lowest tower is preferable.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

7. The PEA Fails to Evaluate Visual Impact of New Power Line Conductors' Reflectivity as Might Impact Scenic Views

The PEA fails to describe how reflective the new conductors to be installed will be. New untreated conductors exhibit a highly reflective surface and don't achieve a matt finish until after a few years, depending on the climate and the degree of air pollution. Even new conductors can, however be treated to reflect less light or to exhibit a low contrast with the background. Without this information, the PEA has no substantial evidence to claim that the new conductors will have a less-than-significant visual impact in this community's scenic setting.

C. Project's Noise Impacts Will Be Significant Due Inconsistency with City of Mt. Shasta and Siskiyou County General Plans Noise Standards, as Well as Other State and Federal Noise Standards.

PacifiCorp has, like Volkswagen's engineers who rigged their auto emission systems to fool regulatory agencies, misinformed the CPUC and the Mt. Shasta public by withholding accurate information about its PacifiCorp/Crystal Geyser Project construction noise impacts. For the moment, this comment section next focuses just on the substation piece of the overall Project and not Crystal Geyser's other noise impacts. PacifiCorp is attempting to wiggle out of effective construction noise impact mitigation as a means of keeping its costs lower while hiding the serious noise impacts it will expose nearby residents to.

By comparison to how this information should be handled, in Initial Study/Mitigated Negative Declaration for PacifiCorp's Morrison Creek Substation Project analyzed potential noise impacts occurring during construction and affecting nearby residents. That PacifiCorp IS/MND considered the construction noise impacts of the Morrison Creek project to be potentially significant unless mitigated and effectively limited to daytime hours. That IS/MND included a noise mitigation that the public could have enforced had construction noise levels been excessive. Similarly for PG&E's Lodi 60 kV substation project, its Project EIR evaluated construction noise, found it to be potentially significant, and imposed a 7am - 7pm time limit for daytime operations only.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

1. PEA Presents No Predicted Noise Level Data Representing Residential Noise Level Exposure

But PacifiCorp's PEA for this PacifiCorp/Crystal Geyser Project takes a different, legally inadequate approach to review of such construction noise impacts. First, the PEA entirely fails to provide any accurate data or analysis of how loud the construction noise would be at affected sensitive receptors. The PEA's Table 4.12-2 with boilerplate information about "typical ranges of common sources" does not qualify as relevant data for use in this PEA. Neither is the PEA's page 194, Table 4.12-4 "typical construction equipment noise levels" information valid because it is too vague to represent the actual likely equipment noise that homes will be exposed to. Nowhere does the PEA describe what the maximum cumulative noise levels will be from the operation of multiple construction equipment at the same time.

2. PEA Underestimate How Severe Project Noise Will Be.

The PEA, p. 193, deceptively claims that *"This noise would be audible to residences located within 50 feet of the Project."* That severely underestimates the impact of such construction noise. The truth is this construction noise would be audible and would exceed permissible noise limits at homes much farther from this Project's construction activities. To be audible, construction noise only need to be a few decibels louder than the existing ambient noise levels. Where some of the Project construction would occur, existing ambient noise levels are at times less than 40 dBA L_{eq} .¹¹ Considering just the maximum noise from a single tractor's operation of 96 dBA at a distance of 50 feet as listed in Table 4.12-4, such construction equipment noise levels could still be audible (i.e. greater than 45 dBA), or greater than permissible City of Mt. Shasta noise standards (65 dBA) at distances of over 1,000 feet assuming a 6 to 7.5 dBA attenuation rate per doubling of distance. When more equipment is operating simultaneously, the noise levels would be additive and would be even louder. Yet the PEA never considers that construction noise will be generated by more than a single piece of equipment at one time. As such, its conclusions of construction noise being less-than-significant are unsupported by substantial evidence.

¹¹ For example, the Project proposes some construction on Mill Street within the City of Mt. Shasta where ambient noise levels are often below 40 dBA L_{eq} during early morning hours.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

3. PEA Does Not Evaluate or Mitigate Significant Sleep-disturbance Impacts Occurring Before 7:00 a.m.

Furthermore, PacifiCorp's PEA adopts no noise mitigation to prevent sleep-disturbance impacts likely caused by early morning construction activities during Project construction. The PEA, p. 189, admits that "Noise levels that exceed 45 dBA at night could deprive local residents of sleep or interfere with their normal patterns of sleep." The PEA, p. 194, claims that "construction occurring in proximity to residential areas would occur between 7:00 a.m. and 7:00 p.m." But that statement does not mean that construction will also not begin before 7:00 a.m. Elsewhere, the PEA, p. 191, states: "No construction activities would occur in proximity to existing residential uses except between the hours of 7 a.m. and 7 p.m., Monday through Friday, or 8 a.m. to 5 p.m. on Saturdays." But that claim provides no definition or limitation on the term "proximity." Since the Project's construction noise could be significant and in excess of applicable standards for hundreds of feet, if not a thousand feet or more, the PEA's reassurance is essentially meaningless. It would not reduce construction noise impacts to a less-than-significant level for some residences.

By comparison, the EIR for the Lodi 60 kV project evaluated construction noise and imposed a 7 am -7 pm time limit. In the absence of any effective noise mitigation, the PEA's determination is not supported by substantial evidence.

4. Locations of the Most Severely Noise Impacted Homes Are Not Adequately Identified In P.E.A.

The PEA is inadequate for failing to even identify which homes will be exposed to this Project's loud construction noise levels or estimating how loud such noise will be at individual homes to be exposed to excessive construction noise. That information is typically provided on maps in similar project applications using noise level contours or other means. Neither does the PEA describe any of the ambient noise level conditions at the homes at risk of excessive noise exposure so that the public can assess whether there will be significant temporary noise level increases above ambient conditions existing without these Project activities. Evaluation of such temporary noise impacts is required by CEQA. Instead, all the PEA states is:

B5-1
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

"Most of the residences in the Project area are located in the City of Mt. Shasta; however, residences are scattered throughout the Project area. The nearest existing noise-sensitive receptors potentially impacted by the construction and operation of the proposed Project are the occupied residences. Residential dwellings potentially impacted by installation of new poles and replacement of existing poles along the transmission line are located at various distances from the pole locations. The majority of the residential uses are located south of the existing and proposed substation sites; however, there are a few scattered residences north of the substation sites. These residences range in distance from the pole locations between approximately 70 feet and 580 feet. Sensitive noise receptors near the distribution line upgrade consist of residential uses including a senior community."

The public is left asking "which homes will be adversely affected?" This information is not unknowable or unpredictable. It must be disclosed. The PEA accordingly provides inadequate information to the CPUC and the public to evaluate whether such construction noise levels will be excessive or sleep-disturbing.

5. Project-related Time of Day Construction Activities Are Not Adequately Regulated or Mitigated.

Moreover, the Project Description does not contain any time limits for construction activities. During hot summer weather, construction companies often begin outdoor work before 7:00 a.m. to avoid the heat. These early morning hours are times when significant sleep-disturbance impacts may occur. The PEA however never discusses sleep-disturbance impacts. Nor does PacifiCorp propose any noise-related time limits that can be ensured by enforceable mitigations. The PEA's mere mention with the above-criticized, vague language about time of day operations to suggest at best that construction noise impacts won't be significant is not sufficient. Going without noise mitigation wasn't sufficient for the Lodi, CA EIR or the Morrison Creek Substation's IS/MND. People in the City of Mt. Shasta at least deserve equal noise protection, and deserve compliance with CEQA which PacifiCorp, an Oregon company, may not be familiar with. The PEA accordingly fails to comply with CEQA by failing to demonstrate that short-term construction noise impacts will be less-than-significant.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

6. Project's Daytime Construction Noise Exposure at Existing Homes Will Also Exceed Acceptable Noise Standards

The PEA also fails to evaluate which homes will be exposed to noise levels that exceed City or County noise standards even during the daytime hours. The PEA instead seems to take the position that as long as construction noise occurs after 7:00 a.m. in the morning, that everyone has left their homes and any noise level exposures at those homes is acceptable. But based on that apparent assumption, the PEA incorrectly concludes (p.194) that

"While impacts associated with demolition and construction activities will be *less than significant*, PacifiCorp will employ the following noise-reducing practices in an effort to further reduce noise produced by these activities: "

The "noise-reducing practices" the PEA lists on page 194 are not sufficiently enforceable or meaningful to cure the serious deficiencies in its Project's noise impacts. They are excessively vague as worded. They are not enforceable as would be CEQA mitigations. They contain no specific performance standards by which the public can be assured any meaningful noise attenuation will occur even if utilized. CEQA does not allow PacifiCorp to get away with using such smoke and mirror posturing instead of implementing required scientific analysis and effective mitigations. As shown next, some homes could be exposed to significant and excessive construction noise levels of over 100 dBA L_{eq} even during daylight hours.

7. Distances to the nearest affected residences are overstated, resulting in underestimated noise level prediction.

There is no evidence whatsoever that noise levels at affected homes will be less-than-significant. The PEA, p. 189, admits that *"These residences range in distance from the pole locations between approximately 70 feet and 580 feet. Sensitive noise receptors near the distribution line upgrade consist of residential uses including a senior community."*

The fact is that some homes are even closer than that to some Project pole locations and other Project activities. Two homes at the corner of Mill Street and Forest Street are only about 40 feet

B5-1
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

from a proposed power pole (#167241) that will be modified with increased voltage wires.¹² Along South Old Stage Road are homes closer to proposed pole positions than the PEA estimates too. Along West Jessie Street are five homes within 40 to 50 feet of Project undergrounding activities. But the PEA totally ignores that those homes so close to Project activities will be exposed to excessive construction noise levels.

For example, if the Project installs a reconducted 12.47 kV distribution power line along Mill Street between Forest Street and Water Street, the Project contractors will have to use heavy equipment like noisy trucks and tractors to pull and tension it:

"Tensioners, line trucks, wire trailers, and tractors needed for stringing and anchoring the ground wire or conductor would be located at the tensioning sites. A puller, line trucks, and tractors needed for pulling and temporarily anchoring the counterpoise/ground wire and conductor would be located at the pulling sites." (See PEA, p.39)

If a tractor under load generates noise levels of 97 dBA at a distance of 50 feet, any home only 40 feet away could be exposed to construction noise levels of over 100 dBA L_{eq} even during daylight hours. If other equipment simultaneously operates there, the noise exposures will increase even more. Such noise levels would be seriously excessive and significant. The PEA fails to comply with CEQA for having withheld such accurate information about distances and noise levels from the public and the CPUC.

8. Temporary Construction Noise Will Not Be Insignificant

As one egregious example of PacifiCorp's deceptive arguments, the PEA makes this totally unsupported and inaccurate claim:

"When compared to existing noise sources within the Project vicinity (e.g., vehicles on adjacent roads and I-5, farming equipment), these intermittent noises would not represent a significant change or impact over the existing noises within the area."

The PEA cannot justify that statement because (1) there is no data in the PEA about existing noise levels, and (2) there is no information on how loud at maximum the intermittent construction noise levels will be at existing houses. The PEA also provides no threshold of significance by

¹² See PEA, Fig. 3-5G for pole location. Distance estimated using Google Earth distance tool.

B5-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

which to judge how significant such intermittent noise level increases will be. PacifiCorp violates CEQA by fabricating baseless claims like that and concluding its Project will not generate significant construction noise impacts.

IV. REQUEST FOR HEARING

For these reasons, MT. SHASTA TOMORROW states that a hearing is necessary to address the deficiencies within PacifiCorp's Application and PEA for this project and for the Commission to properly make its decision. MT. SHASTA TOMORROW respectfully protests this application and requests that the Commission either reconsider the need for this project proposed by PacifiCorp. If this Project moves forward, Mt. Shasta Tomorrow asks that the new power lines all be underground, and requests the Commission prepare a full EIR for this Project. .

V. CONCLUSION

Thank you for considering these concerns and Mt. Shasta Tomorrow's protest of this PacifiCorp/Crystal Geyser Project application.

Dated: January 31, 2016 (*Originally submitted on December 7, 2015.*)

Respectfully submitted,

s/ Dale La Forest

Dale La Forest

Secretary and Director,

MT. SHASTA TOMORROW

101 E. Alma Street, Suite 100-A

Mt. Shasta CA 96067

Tel: 5530.918.8625

E-mail: mtshastatomorrow@excite.com

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter B5

**Mt. Shasta Tomorrow (non-profit corporation)
Dale La Forest
December 23, 2016**

B5-1 The commenter resubmitted comments previously submitted as part of a protest to the proposed project's Proponent's Environmental Assessment (PEA). The PEA contains the applicant's environmental analysis, for which the California Public Utilities Commission (CPUC) is not responsible. It is one of several source documents used by the CPUC to prepare the Draft Initial Study/Mitigated Negative Declaration (IS/MND). The entirety of the comments submitted address the PEA, and many of the comments are now moot since the project has been redesigned or impacts have been mitigated where necessary. It is not possible, therefore, to ascertain which comments are relevant to the IS/MND. Since there are no specific comments relating to the adequacy of the environmental analysis in the IS/MND, no additional response can be provided or is required.

The commenter was contacted on December 28, 2016, and given until January 16, 2017, to update comments to directly address the IS/MND; no response had been received by the time of this Final IS/MND.

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Comment Letter B6

From: [Richard Lucas](#)
To: [Lassen Substation Project](#); michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov; cgm@cpuc.ca.gov
Subject: Re: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 4:54:21 PM
Attachments: [161223 LassenSubstation.docx](#)
[161223 LassenSubstation.pdf](#)

Dec. 23, 2016

Mr. Michael Rosauer
Project Manager, California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Re: Notice of Intent to adopt a Mitigated Negative Declaration
PacificCorp Lassen Substation Project
Application No. A.15-11-005

Dear Mr. Rosauer:

The Mount Shasta Bioregional Ecology Center is a grassroots organization dedicated to preserve and protect our pristine mountain environment. We would like to comment on this project, planned for a site alongside the Volcanic Legacy Scenic Byway in our area.

While we recognize the need for proper power infrastructure to serve our community, the project includes power poles which are much higher than the existing ones. This will adversely impact views and take away from our scenic values. We believe it is important to fully consider underground placement for this infrastructure.

Of course the “elephant in the room” is the proposed Crystal Geyser expansion, with its greatly increased power needs. A project to serve community needs is one thing, but degrading our viewshed to serve anticipated needs of a multinational corporation – for activities not yet approved – is premature. If such expansion is approved, the cost of expanded infrastructure must be paid by that corporation – not our ratepayers.

Therefore, we join voices with others to request the scheduling of a hearing on this matter, to take place in our local area. Such a hearing should thoroughly present the need, costs and alternatives for this project. Our goal is to preserve our views and support businesses whose profits stay in our local economy. This project, in our opinion, does not currently meet such criteria.

Thank you for your consideration of these comments. Please add us to your mailing list for further information regarding this project.

Sincerely,

Richard Lucas

B6-1

B6-2

B6-3

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

President of the Board, Mount Shasta Bioregional Ecology Center
PO Box 1143
Mount Shasta, CA 96067 USA
richard@shastavisions.com
www.mountshastaecology.org

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project



MOUNT SHASTA BIOREGIONAL ECOLOGY CENTER
Honoring and Protecting our Mountain Environment Since 1988

PO Box 1143
Mt. Shasta, CA 96094
December 23, 2016

Mr. Michael Rosauer
Project Manager, California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Re: Notice of Intent to adopt a Mitigated Negative Declaration
PacifiCorp Lassen Substation Project
Application No. A.15-11-005

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Thank you for your consideration of these comments. Please add us to your mailing list for further information regarding this project.

Sincerely,

Richard Lucas

Richard Lucas, President
For the Board of Directors
Mount Shasta Bioregional Ecology Center

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Response to Comment Letter B6

**Mount Shasta Bioregional Ecology Center
Richard Lucas
December 23, 2016**

- B6-1** The commenter's concerns about the proposed project are noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.
- B6-2** The commenter requests that the proposed replacement transmission line be placed underground, citing local ordinance requirements. Please see General Response 4 (GEN4) for a detailed analysis of the relationship between the proposed project and local City and County utility ordinances.
- B6-3** The commenter suggests that Crystal Geyser Water Company should pay for the upgrade to the transmission system. Determination of cost is outside the purview of the CEQA process, and no further response is required.

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Comment Letter B7



December 12, 2016

Mr. Michael Rosauer
California Public Utilities Commission, c/o Dudek
605 Third Street
Encinitas, CA 92024

Dear Mr. Rosauer,

Siskiyou Economic Development Council is pleased to offer its support of the Lassen Substation Project. The idea of this project originated in 2010 as a way of enhancing system reliability and meeting current and future service obligations. We were in support of the project at that point in time and are pleased to offer support now. These efforts will improve service reliability and increase electrical capacity for the City of Mt. Shasta.

The mission of the Siskiyou Economic Development Council is to facilitate business growth, retention, and attraction to promote community prosperity. We accomplish our mission by developing strategies that will result in the constructive, balanced economic growth of our region. The Lassen Substation Project will build additional capacity in the system, and aligns with our mission to support business growth, retention and attraction.

One of the most important considerations a business takes into account when looking at locating to a community is electric utility; this project will enhance the City's ability retain as well as attract new businesses to the area. It will allow the city to offer a secure source of electric utility for years to come.

Again, we fully support the Lassen Substation Project and believe this project will improve service reliability and the economic health of Mt. Shasta. We look forward to a successful completion of this meaningful investment.

Sincerely,



Tonya Dowse
Executive Director
Siskiyou Economic Development Council

1512 S. Oregon Street, Yreka CA 96097 | Phone: 530-842-1638 | www.siskiyoucounty.org

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter B7

**Siskiyou Economic Development – Tonya Dowse
December 12, 2016**

- B7-1** The commenter's support of the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

C. Individuals

Comment Letter C1

From: [Larry Stock](#)
To: [Lassen Substation Project](#)
Subject: Lassen Sub Station
Date: Wednesday, December 07, 2016 12:01:41 PM
Attachments: [image001.jpg](#)
[Larry B. Stock.vcf](#)

We in Mount Shasta are pleased that you are planning on upgrading and installing a new substation for our benefit.

This is definitely needed due to the antiquated state of the existing facility. We have outages that would be avoided if we had a more reliable and updated substation.

Our communities continued growth demands that we have infrastructure to support any type of growth or improvements.

Power is an essential element of this infrastructure.

So I support your upgrading and continued provision of electricity to benefit our community.



C1-1

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Response to Comment Letter C1

**Market Place Insurance Services
Larry Stock
December 7, 2016**

- C1-1** The commenter's support of the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

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Comment Letter C2

From: [Ted Marconi](#)
To: [Lassen Substation Project](#)
Subject: Lassen Substation
Date: Thursday, December 08, 2016 12:13:56 PM

Dear PUC:

I am writing in support of approval of PacifiCorp's Lassen Substation Project. This project is a vital upgrade to the infrastructure of our community. Despite the number of protests you might receive from those who believe this project is for the benefit on an industrial use which they oppose, the fact is this project is an important safety issue for this area. As a former Mt. Shasta City Manager I became aware that with our frequent winter storms that can black out power for hours or even days at a time, these upgrades are necessary to provide redundancy and backup to our power supply, as well as to provide future capacity for our economy.

C2-1

Ted Marconi
210 Eugene Avenue
Mount Shasta, CA 96061



This email has been checked for viruses by Avast antivirus software.
www.avast.com

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Response to Comment Letter C2

**Ted Marconi
December 8, 2016**

- C2-1** The commenter's support of the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Comment Letter C3

From: [Nancy Gandrau](#)
To: [Lassen Substation Project](#)
Date: Tuesday, December 13, 2016 9:37:29 PM

Nancy J Gandrau
814 C Caroline Avenue
Mt Shasta CA 96067

14 December 2016

Michael Rosauer
California Public Utilities Commission
c/o Dudek
605 Third Street
Encinitas CA 92024

RE: Lassen Substation Project

The existing Lassen Substation is nearing the end of its useful life. It is prudent to replace the substation now rather than to risk a loss of operation at the existing station.

The chosen site is immediately adjacent to the current site minimizing the impact to the view shed and environment.

Building additional capacity in the system aligns with the City and County's desire to support job retention and expansion, and critical obligations.

Capital improvements are designed to meet existing customer requirements, with additional capacity to meet future load requirements.

This project will improve service reliability to Siskiyou County and reliability in the area by providing a secondary source of energy delivery in the event one source fails.

As a citizen of Mt Shasta for more than 20 years I support the Lassen Substation Project.

Respectfully,

Nancy J Gandrau

C3-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C3

**Nancy J. Gandrau
December 13, 2016**

- C3-1** The commenter's support of the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C4

From: zavada@snowcrest.net
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Tuesday, December 20, 2016 11:15:45 PM

Dear Folks at CPUC,

I am writing with serious concerns about Pacificorps plans to dramatically increase power output at "Lassen sub-station" for the obvious benefit of the impending opening of Crystal Geyser plant. We the citizens of this community should certainly not have to foot any of the bill in increased power costs, and there should be a full and complete EIR done before any of this build out is agreed upon. The beauty of our environment and the tourism that we depend upon is adversely affected by new poles/more above ground power lines/etc.

Please understand that this community and the public here are watching this carefully and expect you to be completely transparent in explaining to us the real needs of our small community vs. the needs of a giant corporation intent on coming here and taking our precious water at a time of unprecedented drought; a corporation that the majority of the citizens here do not want.

Thank you for dedicated efforts in preserving the well being of the citizens and the environment.

Kathy Zavada

This message was sent using SnowCrest WebMail.
<http://www.snowcrest.net>

C4-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C4

**Kathy Zavada
December 20, 2016**

- C4-1** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission (CPUC) during project deliberation. The CPUC has determined that there are no potentially significant impacts associated with the proposed project; as such, the California Environmental Quality Act does not require an environmental impact report. Since the commenter does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration, no additional response is provided or required.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Comment Letter C5

From: [Dave Casebeer](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Wednesday, December 21, 2016 8:06:38 PM

To Whom It May Concern,

Many caring intelligent people are concerned about increased harm to our beautiful Mt. Shasta community due to unnecessary utility poles and "corporate welfare" (ie: Crystal Geyser doesn't pay their fair share).

The aesthetic value component involved here is paramount to local residents as well as many tourists coming to our pristine beauty. I moved here 12 years ago for health reasons to include being happier with beautiful nature views not the "concrete jungle" of city/suburban living.

After 36 years of visiting Mt. Shasta and 12 years as a resident to include desiring what is best for the greater good of life I ask you to consider not having above ground utility poles and not increasing capacity if it is for Crystal Geyser and they are not paying their fair share.

Thank you for your attention to this matter.

Sincerely,

David A. Casebeer
2338 Jakes Place
Mt. Shasta, CA 96067

C5-1

C5-2

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C5

**David A. Casebeer
December 21, 2016**

- C5-1** The commenter's opinion on the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The commenter raised concerns about the distribution of project cost. However, issues regarding cost are outside the scope of the California Environmental Quality Act process, and no further response is required. The commenter also raises concerns regard the proposed project's impacts on aesthetics. Please see General Response 3 (GEN3) regarding the response to aesthetics impacts of the proposed project.
- C5-2** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C6

From: [Saranam Web Design](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Wednesday, December 21, 2016 3:27:41 PM

To whom it may concern:

I have been a resident of the Mount Shasta community for almost 5 years, living for 3 years within a mile of the proposed substation project.

I am quite concerned about this proposed project, which seems to primarily serve the anticipated needs of the Crystal Geyser Plant, which has not yet been approved. The local power users should not be the ones to foot the bill for the Crystal Geyser Plant. The Crystal Geyser Plant's parent company should pay for it's own infrastructure.

If it is deemed that improvement are necessary for the existing residents, which seems quite dubious, then the cables should be underground, as required by local ordinances, because Mount Shasta is a pristine area of great natural beauty.

Thank you for considering my comments.

Sincerely,

Mark Greenberg
412 E Ivy St
Mount Shasta, CA 96067

C6-1

C6-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C6

**Mark Greenberg
December 21, 2016**

- C6-1** The commenter raises concerns about the link between the proposed project and the Crystal Geyser bottling plant project (Crystal Geyser project). The proposed project has utility independent of the Crystal Geyser project, and permitting of the Crystal Geyser project is not required for the function of the proposed project. It is, therefore, the view of the California Public Utilities Commission that the proposed substation is independent of the Crystal Geyser project. Please see General Response 1 (GEN1) for a more detailed discussion. The commenter also raises concerns regarding the distribution of costs resulting from construction of the substation. Determination of cost is outside the purview of the California Environmental Quality Act process, and no further response is required.
- C6-2** The commenter indicates that local ordinances require undergrounding of transmission lines. Please see General Response 4 (GEN4) regarding the application of local ordinances to the proposed project.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Comment Letter C7

From: [Francis Mangels](#)
To: [Lassen Substation Project](#)
Subject: public comment enclosed
Date: Wednesday, December 21, 2016 10:15:17 PM
Attachments: [Substation Comment.docx](#)

see attached

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

COMMENT ON LASSEN SUBSTATION

Granted, that almost all visual problems with the new substation can be mitigated if the company chooses to do so, and at comparatively little expense.

However, we ask that you put the wires underground like they do in Europe, to avoid the nasty tower blight. Notably, they will be highly visible along Barr, Siskiyou, and Ream road. You should be underground all the way.

And if you don't, I suggest you review historical ice storms that brought down a number of power poles. You want these things low, not to mention the vandalism by unhappy "patriots" with rifles practicing on ceramic transformers. As a retired USDA officer, I saw plenty of this. We have some company-haters around here, including secessionists.

A letter from Senator Feinstein clearly states that without the new substation, the Crystal geyser factory cannot be fully operable. Therefore, I contend that the substation is and should be an integral part of the proposed EIR if it is built anywhere to overcapacity to serve the proposed CG Factory.

I think it is grossly unfair for me to pay in power fee increases the costs of massively overbuilding the Lassen Substation, plus a new power line to the proposed factory of CG Otsuka, so they can reap all the profits while I have to pay for it.

That is outrageous. The town paying for corporate welfare! We don't want it!

The building of the power line is hopelessly intermingled with the factory rebuild and increases the need for this to be in the EIR, not simply wishy-washed aside and bureaucratically buried so I have to pay for it.

If they want it so badly, let multibillionaire Otsuka pay for the substation and the powerline to their new factory. Let people who drink their plastic-bottle products pay for everything, not me. You can't dump all this stuff on me.

Granted, this substation is not so bizarre and brazen as the other stuff indicated by CG Otsuka. An upgrade is useful. However, the plot to piggy-back the Japanese warlords into our midst with your substation really puts lawyers on the line to oppose the substation as presently proposed. THINK!!!!

You avoided the most important parts of the project, the intermingling purposes. By reference, I include and document my two pages submitted at the Mt. Shasta meeting.

A mitigated declaration is therefore totally unacceptable.

Sincerely, /s/

Francis Mangels, retired USDA scientist and field officer GS-11, 35 years' service.

736 Pine Ridge, Mt Shasta, CA 96067 ph. 530-926-0311 in pm

C7-1

C7-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C7

**Francis Mangels
December 21, 2016**

- C7-1** The commenter requests that lines be undergrounded to avoid aesthetic impacts. Undergrounding of transmission lines would be considered if it is a feasible alternative necessary to mitigate a significant impact to an environmental resource (i.e., to reduce a significant aesthetics impact). The California Public Utilities Commission's analysis indicates that the proposed project would not result in a significant impact to aesthetics resources, so undergrounding is not considered as a project alternative. Lines are not undergrounded as a matter of routine because of increased cost and potential to result in greater impacts to other resources; in this case, wetlands.
- C7-2** The commenter raises concerns regarding the distribution of costs resulting from construction of the substation. Determination of cost is outside the purview of the California Environmental Quality Act process, and no further response is required.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C8

From: [Todd Cory](#)
To: [Lassen Substation Project](#)
Cc: [Michael Rosauer](#); [Robert Haga](#); pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Thursday, December 22, 2016 6:26:55 PM

To whom it may concern:

My name is Todd Cory. I am a retired electrical contractor (C-10 #811428) who has lived in the Mount Shasta area for over 33 years. Please accept my comments regarding the proposed Lassen Substation upgrade:

1) I was one of three operators at our local Box Canyon Hydroelectric Dam for 11 years. Presently the power leaves the plant at 4160 volts. This is interfaced with the PP&L utility grid via a 4160 to 69,000 volt transformer capable of handling the plants 6.5 mW output. This equipment is located in the switchyard on the north side of the dam. The 69,000 volt conductors run from there, through the golf course to interconnect with the PP&L high voltage distribution lines on old stage road, south of the Reem Avenue, Interstate 5 overpass. If the Lassen substation's primary voltage is going from 69,000 to 115,000 volts, the existing interface will not work. A 4160 to 115,000 volt transformer or a 69,000 to 115,000 volt transformer will be needed. I am curious who will pay for the new transformer and upgrading to the existing high voltage conductors?

2) One of the reasons given for the need for this substation's changes was because it has not been upgraded since it was built in 1930. When driving by this facility I see new, fresh creosote poles obviously not from 1930. I also see old style transformers likely from 1930, but I also see new style transformers too. In light of my observations it appears highly disingenuous to claim no upgrades have happened since 1930! It is more likely that the reason for the upgrade is in anticipation of the commercial scale loading from the proposed Crystal Geyser bottling plant.

3) We live in a pristine, beautiful and scenic area. Our Mount Shasta economy is based on tourism. To upgrade the existing electrical infrastructure without considering current best

C8-1

C8-2

C8-3

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

practices and codes by undergrounding the primary feeders does not take into account the visual impacts to our area. Indeed about 10 years ago, many of the downtown lines were undergrounded to help preserve our scenic viewsheds. Why should this upgrade be exempt from the visual impacts of taller poles or current undergrounding practices?

Thank you for receiving my comments.

Sincerely,

Todd Cory
P.O. Box 689
Mount Shasta, CA 96067
530.926.1079

↑
C8-3
Cont.
↓

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C8

**Todd Cory
December 22, 2016**

- C8-1** The commenter asks who will be responsible for transformer upgrades to support interconnection of the Box Canyon Hydroelectric Dam should the primary voltage for the proposed project be upgraded to 115 kilovolts. Questions of cost are outside the scope of the California Environmental Quality Act. Since the commenter does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration (IS/MND), no additional response is provided or required.
- C8-2** The commenter contends that the condition of the substation is misrepresented and that staff indicated that there had been no upgrades since the 1930s. The California Public Utilities Commission's position, as stated in Section 4.2, Project Objectives, of the IS/MND, is that there are several elements of the existing system that require upgrading, including wooden support framing, transformers, breakers, and distribution lines that are inadequately located in culverts under the jurisdiction of the California Department of Transportation. There is sufficient evidence to support the need to rebuild the existing substation, which would be built to modern standards and would require a new substation location.
- C8-3** The commenter indicates that the proposed replacement transmission lines should be placed underground, citing conformity with local ordinances. Please see General Response 4 (GEN4) for a detailed analysis of the application and relationship between the proposed project and local City and County utility ordinances. Also, please note that components of the proposed project, including upgrading the transmission line and installing replacement poles, are evaluated for potential impacts to scenic resources in Section 5.1, Aesthetics, of the IS/MND.

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PacifiCorp Lassen Substation Project**

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Comment Letter C9

From: jef.scoops
To: dln.zosbahr@cpuc.ca.gov
Cc: cynthiaw@cpuc.ca.gov; Lassen Substation Project; pod@cpuc.ca.gov; robert.haga@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No. A15-11-005
Date: Thursday, December 22, 2016, 9:10:05 AM
Attachments: CPUC PACIFIC CORP BMD 3.pdf
CPUC PACIFIC CORP BMD 3.pdf
CPUC PACIFIC CORP BMD 3.pdf
PacifiCorp Letter to CPUC Staff re CPUC Staff Copy 2.pdf
PacifiCorp Letter to CPUC Staff re CPUC Staff Copy 2.pdf

Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No. A.15-11-005

To: mike.rosehauser@cpuc.ca.gov cc:
LassenSubstation@dudek.com

cc: Robert Haga <robert.haga@cpuc.ca.gov> cc:
pod@cpuc.ca.gov
C.C. oehm@cpuc.ca.gov

Dear CPUC Staff, Environmental Consultants, Judge Haga and Commissioner Podolinsky,

I have resided in Mt. Shasta for ten years and have often felt our view shed must be protected. I was glad to learn that the city and county have ordinances requiring under ground utilities as there are many areas that will be developing and these regulations will protect our community.

It is apparent that there is a clear connection between the new Lassen Substation and the Crystal Geyser Water Company project. Senator Dianne Feinstein is on record in a letter to the EDA in 2012 mentioning that the grant for the City of Mt. Shasta and Crystal Geyser as primary beneficiary, would bring a new substation to the community. As you are aware this is a highly controversial project in the Mount Shasta area. After years of protest in support of a full EIR, Siskiyou County is in final stages of producing a DEIR for circulation.

The attached documents indicate that the CPUC has been involved in this process since 2013. There is every indication that there are red flags of corporate welfare involved in this process of providing power to the plant. Please consider carefully before approving this MND that fails to address important aesthetic concerns as well as concerns regarding ratepayers subsidizing this international corporation's project. Otsuka Pharmaceutical Holdings is the parent company and can afford to pay their own way.

Mount Shasta is a special location and deserves the most stringent developmental standards. The placing of utilities underground is accepted as necessary and desirable in the City of Mt. Shasta and in Siskiyou County as well. Aesthetics matter to our residents and tourists. **Please come visit this lovely place described by the Mt. Shasta Tourist Bureau as "where Heaven Meets Earth".**

Attached are some documents that illustrate the interconnectedness of the Lassen Substation with the Crystal Geyser project. The Crystal Geyser project should be prominently featured as the primary beneficiary in the environmental and economic reviews.

I am a concerned senior who often treks along the route of the proposed "upgrade". I travel to Lake Siskiyou to walk and love the vistas of the mountain from Old Stage Road. It is time to actually "upgrade" and "evolve" and to follow "best practices" in this project. I do not object to upgrades of substandard power equipment, yet feel our viewshed is priceless and must be respected.

Your careful consideration of this project is requested and appreciated.

Respectfully submitted,

Joel Goodman
P.O. Box 890
Mt. Shasta CA 96067

If you have trouble opening any of these attachments please let me know.

C9-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Alviar, Janet

From: Dietrich, William
Sent: Tuesday, April 30, 2013 11:35 AM
To: Randolph, Edward F.; Walker, Cynthia; Sterkel, Merideth "Molly"; Strauss, Robert; Borak, Mary Jo; Sher, Nicholas
Subject: Mt. Shasta Bottling Plant interconnection -- FYI, compliments from stakeholders

As you know, Energy Division staff (Mary Jo Borak and I) and our attorney, Nick Sher, have been assisting Siskiyou County economic development staff and officials, and Pacific Power, in understanding CEQA and related CPU procedures and options regarding interconnecting a dormant bottling plant in the City of Mt. Shasta, California. Darrow, Program Director, Siskiyou County Economic Development Council, sent me an e-mail containing the following with his permission I am forwarding it to you. (Monte refers to Monte Mendenhall, Regional Commission Manager, PacificCorp. Pacific Power is part of PacificCorp.)

Bill Dietrich

EXCERPT:

From: Jason Darrow [jason@siskiyoucounty.org]
Sent: Friday, April 26, 2013 12:20 PM
To: Dietrich, William
Subject: Re: Responses re: Crystal Geyser // Mt. Shasta Bottling Plant

Bill,
...

Monte and I also talked a great deal about you and your team. For both of us you have been "hands down" the best group to work with that we have had in a very long time. Your personable nature, responsiveness and the thoroughness with which each response is addressed is exceptional. We really appreciate everything. Thank you!

Jason

Note:

In a subsequent e-mail, Mr. Darrow also indicated that Greg Plucker, Director of Planning, Siskiyou County, concurred with these sentiments.

C9-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

From: Mulligan, Jack M. <jack.mulligan@cpuc.ca.gov>
Sent: Tuesday, August 04, 2015 2:04 PM
To: Barnsdale, Andrew
Subject: FW: Lassen substation upgrades Mt Shasta

Sure, my calendar is free after 3 - ■■■

Thanks,

Jack

From: Barnsdale, Andrew
Sent: Tuesday, August 04, 2015 1:37 PM
To: Mulligan, Jack M.
Cc: Borak, Mary Jo
Subject: RE: Lassen substation upgrades Mt Shasta

Jack: didn't hear back from you yesterday on this one ... do you have time to discuss it today?

From: hillmanbruce@gmail.com [<mailto:hillmanbruce@gmail.com>] **On Behalf Of** Bruce Hillman
Sent: Tuesday, August 04, 2015 1:22 PM
To: Barnsdale, Andrew
Cc: Borak, Mary Jo
Subject: Re: Lassen substation upgrades Mt Shasta

Hello Andrew,

Have you been able to speak with your other staffer about developments at the Lassen Substation in Mt. Shasta?

Thank you

Bruce Hillman

On Thu, Jul 30, 2015 at 4:20 PM, Barnsdale, Andrew <andrew.barnsdale@cpuc.ca.gov> wrote
Hello Mr. Hillman, I apologize for not having responded to your inquiry – I need to speak with another staffer regarding the Lassen Substation on Monday, and I will be able to respond to you then.

Regards,

Andrew Barnsdale
Infrastructure Permitting and CEQA
Energy Division
California Public Utilities Commission
[415-703-3221](tel:415-703-3221)

From: hillmanbruce@gmail.com [<mailto:hillmanbruce@gmail.com>] **On Behalf Of** Bruce Hillman
Sent: Thursday, July 30, 2015 12:13 PM

C9-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

From: [Barnsdale, Andrew](#) on behalf of [Borak, Mary Jo](#)
To: [Reiger, J. Jason](#); [Mulligan, Jack M.](#)
Subject: FW: Discuss Lassen Substation Temporary Transformer
Date: Tuesday, April 21, 2015 11:00:50 AM
Importance: High

Hoping one of you or someone else from CEQA legal can participate on this call. The temporary transformer is needed for the Crystal Geyser bottling company. PacifiCorp is also planning on filing an application to upgrade their facilities in this area. Can't remember the exact details but they are planning on giving us enough info to start a consulting contract soon. I am worried about piecemealing.

-----Original Appointment-----

From: Barnsdale, Andrew
Sent: Monday, April 20, 2015 5:45 PM
To: Barnsdale, Andrew; Borak, Mary Jo; Rosauer, Michael
Subject: Discuss Lassen Substation Temporary Transformer
When: Tuesday, April 21, 2015 2:30 PM-3:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Energy 866 832 6190 Energy-CEQA; Room 4005
Importance: High

866 832 6190
Code: 860-8786

On Friday we discussed the option of installing a temporary transformer at the existing Mt. Shasta Substation and whether we would be required to include this in the PEA for the Lassen Substation. PacifiCorp has an existing spare transformer currently stored at our facilities in Medford, Oregon that would be used as the temporary transformer. As promised, here is a brief overview:

1. The temporary transformer proposed for installation at Mount Shasta Substation will fit within the existing footprint and fence line.
2. The temporary transformer combined with the existing distribution path to the Crystal Geyser facility will provide only a portion of the capacity requested by the customer. The remaining capacity of the temporary transformer must be kept available as a redundant supply for restoration of the other Mount Shasta customers because the transformer will occupy a spot that until now has been reserved for a mobile transformer that ordinarily provides redundancy.
3. The new Lassen Substation will provide the capacity to fully supply Crystal Geyser as well as to supply load growth for the entire Mount Shasta region for many decades.

We have time on Tuesday, April 21 at 10:00 to 11:00 or 1:30 to 3:00 to discuss further. Will one of these times work for you?

Thanks
Cathie

C9-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

From: Julie Meadows <julie@siskiyoucounty.org>
Sent: Friday, April 26, 2013 2:32 PM
To: Greg Plucker; Tom Odom
Subject: Confidential Industry Announcement

Tom and Greg,
Crystal Geyser has tentatively set May 15th for their formal public announcement
Coca-Cola Bottling Plan in Mt. Shasta. Please save the date on your calendar. At
time the exact time has not been determined (should take place around midday).

I will let you know when the date and time have been confirmed. Let me know if
have any questions.

Julie Meadows
Executive Assistant
1512 S. Oregon Street
Yreka, CA 96097
530.842.1638
www.facebook.com/SiskiyouEDC



C9-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project



Crystal Geyser is seeking corporate welfare from California taxpayers to add to its overseas profits. This time CG wants the public to pay for oversized electric power lines and equipment. CG wants to increase its electrical power consumption for air-conditioning and brewing beverages by five times as much as Coca-Cola once used on Ski Village Drive prior to shutting down the bottling plant in 2010. Owned by Otsuka Pharmaceutical from Japan, Crystal Geyser has asked Pacific Power to upgrade connecting electric power lines for an additional 10 megawatts of electric power. That is nearly twice as much electrical power as the Lake Siskiyou dam's hydroelectric power plant generates. The existing power lines near CG's building can only supply about $\frac{1}{4}$ of the power that CG wants.

Coca-Cola used about 2.4 MW of power. Crystal Geyser's emails show that it would be constrained even with 9.5 MW of additional power. One email in March, 2013 to Richard Weklych, Vice President of Manufacturing with Crystal Geyser, explains:

"9,500 KW could be tight since we need electricity for air-conditioning, etc. We want to find out if there is a way to increase when we need more than 9,500 KW. But if it is not easy, at least, we would like to know if we can obtain more than 9,500 KW when needed. Am I answering your question? Best regards, Hitomi"

That needed electrical power increase is being predicted within as soon as 18 months after Crystal Geyser opens its bottling plant.

But the local 69 kv Pacific Power transmission line two miles away cannot supply that much additional power to Crystal Geyser's plant as constructed. Such utility infrastructure changes would require either an electrical substation be constructed or that Crystal Geyser construct its own pad-mounted transformer (referred to as a "customer substation") onsite to handle the extra power. Such changes can require CEQA review according to the California Public Utilities Commission. It appears that Crystal Geyser is attempting to evade CEQA and to hide that fact about its operations and near-future upgraded facility plans from the public.

To put this total electrical need in perspective, Crystal Geyser is proposing needing more than 11.9 MW of power. That is nearly as much power as Nestle proposed for its McCloud water bottling plant which would have been the largest in the United States! The DEIR for that previously proposed Nestle Bottling Plant predicted that by complete buildout, electrical demand for that McCloud project as originally proposed would have been 12.24 MW at summer peak and 13.60 MW at winter peak. (

[Reference](#)

C9-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

R. PATRICK REITEN
President and Chief Executive Officer

825 NE Multnomah Street, Suite 2000
Portland, OR 97232-4116
Office (503) 813-7015
Fax (503) 813-7109



March 1, 2013

The Honorable Ron Wyden
Senate of Oregon
911 NE 11th Ave, Ste 630
Portland, OR 97232

Dear Senator Wyden:

I am writing to you today in the hope that you will join the effort of your colleagues in Congress to urge the U.S. Economic Development Administration (EDA) to make a strategic investment in a project which will help to restore economic vibrancy to a community which Pacific Power, an Oregon company, serves. Pacific Power, as a regional electric provider, strongly supports economic development opportunities that benefit our communities.

The City of Mount Shasta, California, has been selected as a site for a Crystal Geyser bottling operation. Crystal Geyser is currently in escrow for a facility; however, a key barrier to the project is the wastewater capacity of the City of Mount Shasta. The Mount Shasta wastewater capacity improvement project is a perfect project for EDA assistance in that it will leverage significant private sector investment and will help create jobs in an area that has been decimated by economic deterioration. While this project is located in California, Pacific Power serves the community of Mount Shasta. Pacific Power as a company thrives only when the communities in which we serve are also thriving.

Pacific Power has witnessed the effects of the economic recession and reduced timber harvest on our communities, especially the rural areas we serve in Southern Oregon and Northern California. The Crystal Geyser project, if approved, will bring a new industry and jobs to the community. New projects like this one are key to restoring economic vitality throughout the communities we serve and, in turn, improving the health of our business.

Pacific Power urges your support of this project and hopes you will pass along your endorsement of this project to the EDC.

Thank you

Respectfully,

R. Patrick Reiten

Enclosure

C9-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C9

**Joel Goodman
December 22, 2016**

- C9-1** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C10

From: [Bobby J Henson](#)
To: [Lassen Substation Project](#); michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: PacifiCorp Application and PEA for the Lassen Substation, Mt. Shasta, CA
Date: Thursday, December 22, 2016 9:18:48 AM

My wife and I live on North Old Stage Rd in Mount Shasta, CA near where Pacific Corp is proposing to remove and upgrade their Lassen Substation and the upgrade of existing transmission lines with new power poles that would extend approximately 25 feet higher.

I moved to Mount Shasta because of its outstanding views of Mount Shasta. The replacement of the existing transmission line that crosses Hatchery Lane will extend higher in the air and be an enormous ugly distraction, and could lower the value of our property. I am sure that other neighbors would have strong opinions and that's why the community needs an opportunity to express their views in a local public hearing on this.

I understand that there are county and current city ordinances requiring that new construction be placed underground, and I believe this should be followed from the new Lassen Substation to Lassen Lane.

Thank you,

Bob Henson
730 North Old Stage Rd.
Mount Shasta, CA 96067

C10-1

C10-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C10

**Bobby J. Henson
December 22, 2016**

- C10-1** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration (IS/MND); therefore, no additional response is provided or required.
- C10-2** Please see General Response 4 (GEN4) for a detailed analysis of the relationship between the proposed project and local City and County undergrounding ordinances. Also note that components of the proposed project, including upgrading the transmission line and installing replacement poles, are evaluated for potential impacts to aesthetic resources in Section 5.1, Aesthetics, of the IS/MND.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C11

From: [Marilyn Lemmon](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: PacifiCorp Application and PEA for the Lassen Substation, Mt. Shasta, CA
Date: Thursday, December 22, 2016 8:46:45 AM

My husband and I moved to Mt. Shasta two years ago from the Bay Area after we retired. It had been a dream of ours to move here, and THE REASON for that dream was the beautiful mountain scenery.

We request that the numerous and much taller transmission and distribution poles proposed in the Lassen Substation project be placed underground.
Current city and county ordinances require this. These local ordinances should be respected.

We will personally be affected by the project as it will impact the view from our home on N. Old Stage Road near Hatchery Lane. It will also impact us as we move around the local area. One of the many things I cherish about this area is soaking up the spectacular scenery while returning home from mundane activities such as grocery shopping or going to the dentist. All our visiting friends and relatives light up when they get out of the car and behold the astonishing beauty of this region.

Crystal Gieser is a wealthy international corporation that can easily pay for and should pay for this upgrade.

There should be a public hearing on this issue and it should be held in the Mt. Shasta area so that people in this affected community can attend.

This area is a jewel of natural beauty. That is why people live here and visit from all over the world. Tall, unsightly power poles have no place in or near this community.

Sincerely,

Marilyn Lemmon
Mt. Shasta, CA

C11-1

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C11

**Marilyn Lemmon
December 22, 2016**

- C11-1** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

The commenter requests that the proposed replacement transmission line be placed underground, citing local ordinance requirements. Please see General Response 4 (GEN4) for a detailed analysis of the relationship between the proposed project and local City and County utility ordinances. Also note that components of the proposed project, including upgrading the transmission line and installing replacement poles, are evaluated for potential impacts to aesthetic resources in Section 5.1, Aesthetics, of the Draft Initial Study/Mitigated Negative Declaration. The commenter suggests that Crystal Geyser Water Company should pay for the upgrade to the transmission system. Determination of cost is outside the purview of the California Environmental Quality Act (CEQA) process, and no further response is required.

The commenter requests that a public hearing be held on the proposed project. Requests for hearings lies outside the purview of the CEQA process. The occurrence, location, and timing of any such hearings would be at the discretion of the Administrative Law Judge and the Commissioner assigned to the proceeding.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C12

From: [dan rice](#)
To: [Lassen Substation Project](#)
Subject: Lassen Substation
Date: Thursday, December 22, 2016 6:12:04 PM

Michael Rosauer, CPUC c/o Dudek

I'm writing to the CPUC to urge quick approval of the PTC for PacifiCorp's Lassen Substation Project to replace the existing Mt. Shasta Substation. This project is decades overdue. I hold a special view of this project. I am a retired PacifiCorp employee (28 years) and have lived in Mt. Shasta City for over 30 years. When I transferred to PacifiCorps' Mt Shasta District in Jan. 1985 I was given a tour of all major electric facilities by the District Manager, Chuck Seeley. I recall when we arrived at the Mt. Shasta Substation saying to Mr. Seeley, "...wood structures, really!?" His lighthearted response was, "... someday it'll either fall down or burn down- or both!, we've been lucky so far!"

That was 1985. Since then, this marginal facility has endured many costly repairs, OCB failures, portable subs have been brought in several times, unequal voltages (69 kV to 115 kV) cause complex switching maneuvers resulting in extended outages, safety issues and more. The passage of time and incredibly heavy snow loads have taken their toll on this facility. During the harsh winter of 1992-93 one storm brought the Mt. Shasta area 44" of snow in 24 hours. Wet, heavy snow. There were extended outages. This substation should have been replaced after that winter.

My review of the proposed Lassen Substation shows it will resolve or mitigate just about all of the longstanding problems that Mt. Shasta District personnel have endured over the years. This is a really well designed project!

- Modern structures using appropriate materials to handle snow loads and modern switching equipment

- Voltage balancing (this will increase safety, reduce outage times, automate switching)

- Meets or exceeds all State and/or Federal environmental laws

- Increased capacity for future load growth

- Ideal location, reduces environmental impact, very low population density in immediate area of project

- Much increased system reliability by facilitating southern interface with PG&E at Dog Creek

This project is a no-brainer on two critical issues: It's long overdue and it's a great design! It's that simple. To that end, I strongly urge the CPUC adopt the MND, approve PacifiCorp's Permit to Construct and get this critical project built. It's long overdue. Please, no delays on this project.

I would be pleased to provide additional input if desired. 530-926-0875 or danricems@yahoo.com

C12-1

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Response to Comment Letter C12

**Dan Rice
December 22, 2016**

- C12-1** The commenter's support for the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

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Comment Letter C13

From: [Mary Saint-Marie](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Thursday, December 22, 2016 10:22:28 AM

Dear CPUC staff, Judge Haga and Commissioner Liz Podolinsky,

*Regarding the upgrade to PacifiCorp Lassen Substation Project in Mount Shasta:

I moved to Mount Shasta in 1974. I am an artist and performance artist who loves beauty. I deeply understand and value what Beauty brings to the lives of everyone on the planet. It is an intrinsic value of all hearts everywhere. Aesthetics and Beauty must be in balance with the practical aspects in our lives. We are part of nature.

Financial progress must not rule our lives while the cultural beauty is given little value.

The balanced yin and yang of the planetary expression is not idle philosophy. It is an active, universal, inviolate law of balance in all of nature. The Voice of Beauty is relevant.

It is relevant especially in a mountain community where tourists and pilgrims come for nature's Beauty! They come for it in the form of sports, ecological living and spiritual deepening.

This is an opportunity to have the public review the upgrade and maintenance portion of the project. The lines need to be put underground. This should be a major consideration for this particular mountain community.

A good way to begin this would be to call a public hearing. The citizens who live here need to be heard as they are the ones who have been sculpting the direction toward sports and spiritual tourism and ecology for decades.

*About the payment for this upgrade that appears to be clearly for Crystal Geyser:

First of all, I will say that I do not support multinational corporate bottling of water at all. Especially in plastic. And in a drought. And having it shipped to Japan. Privatization of water clearly destroys the idea that water is a public right. Water is not something to be bought and sold in this way. Again the subject is... what do we value?

Secondly, I would say that if the Crystal Geyser does pass the EIR and does get to open, they should pay for their portion of this project. That seems so obvious, since they are the ones who benefit.

This project does not benefit Mount Shasta people. We are a fast growing world tourist destination. The people coming are not coming to see the blight of an immense corporate heavy industry. That is the antithesis of beauty. It goes against the very direction Mount Shasta has been flowing, as a tourist destination, for many decades.

Now is the time to go deeply into your hearts and be the leaders in the emerging world and culture of caring for the universal law of balance in all of nature.

Now is the time to be caring of our earth.

C13-1

C13-2

C13-3

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Now is the Time.

In Beauty,

Mary Saint-Marie

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C13

**Mary Saint-Marie
December 22, 2016**

- C13-1** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration (IS/MND); therefore, no additional response is provided or required.
- C13-2** The commenter requests that a public hearing be held on the proposed project. Requests for hearings lies outside the purview of the California Environmental Quality Act process. The occurrence, location, and timing of any such hearing would be at the discretion of the Administrative Law Judge and the Commissioner assigned to the proceeding.
- C13-3** The comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.

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Comment Letter C14

From: [Marilyn Taylor](#)
To: [Lassen Substation Project](#)
Cc: [Michael Rosauer](#); [Robert Hada](#); pod@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp LApplication No A.15-11-005
Date: Thursday, December 22, 2016 11:42:32 PM

RE:
***Notice of Intent to adopt a Mitigated Negative Declaration
PacifiCorp Lassen Substation Project
Application No A.15-11-005***

I wish to add my support to those who have so eloquently articulated the concerns of the Mount Shasta community regarding the proposed Crystal Geyser beverage bottling plant.

Our pristine environment is what brings visitors seeking peace, natural beauty, and respite from the industrial world. And the visitors are our life blood here. Our local businesses are known for their friendliness and ethical relationships with our residents and our visitors; these characteristics are not shown by Crystal Geyser.

Crystal Geyser is the antithesis of what we residents, and our visitors, cherish here. The heavy hand of water privatization—a worldwide destructive phenomenon—is felt in all aspects of Crystal Geyser. This includes the noise, bright night lights that shut off our starry skies, heavy truck traffic, and especially the environmental degradation resulting from plastic bottle manufacture and discharge of waste products.

The overall sinister vibe we've received from Crystal Geyser, since their arrival here, changes the felt environment away from the peace, friendliness, and honesty we and our visitors value. Sure, they sponsor some events and sometimes donate some water. But their evasiveness and lack of integrity have been on display enough for us to feel little trust in them.

They have refused to tell us how much of our water they want to take, and there are no contingency plans for possible emergencies. They felt no obligation to follow normal procedures such as getting permits before building and installing equipment, including massive generators and other concerning items. Apparently they consider themselves above the law—or want to sneak in things that might not be agreed to if they went about it honestly and openly. For a very long time they ignored our community's concerns and stalled on getting an EIR.

The flavor is definitely that of multinational corporate capitalism, where all that matters is the bottom line, and people are to be used, not respected. Jobs? What jobs? A few minimum wage positions, perhaps, to operate the mainly automated plant And what can we trust? They defeated a proposed

C14-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

local ordinance modification by putting out expensive advertising plainly lying as to what the ordinance would provide.

Now as to the issue of the changes to our electrical substation: NO, the citizens should not provide corporate welfare by paying the costs of this expanded service for the plant. And YES, the wires should be undergrounded, for all the reasons that have been cited by others.

Please consider justice in this situation and place the needs of our modest-income citizens above those of the deep-pocketed multinational corporation.

Sincerely,

Marilyn C. Taylor

Homeowner in Mount Shasta

↑
C14-1
Cont.
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C14

**Marilyn C. Taylor
December 22, 2016**

C14-1 The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Please see General Response 2 (GEN2) regarding the undergrounding of transmission lines.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Comment Letter C15

From: [marsha.vates](#)
To: [Lassen Substation Project](#); [Michael Rosauer](#); [Robert Haga](#); [pod@cpuc.ca.gov](#)
Subject: Application No A.15-11-005 - RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project
Date: Thursday, December 22, 2016 8:46:00 AM

RE:
Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project
Application No A.15-11-005

To: LassenSubstation@dudek.com
cc: Michael Rosauer <michael.rosauer@cpuc.ca.gov>
cc: Robert Haga <robert.haga@cpuc.ca.gov>
cc: pod@cpuc.ca.gov

Despite the poor economy in Siskiyou County, and the few jobs available to me, I have chosen to continue to live here in Mt. Shasta for sixteen years because of the pristine environment. I walk into the national forest daily to see evidence of hawks, bears, and lions. It is quite different from where I grew up in New York where I saw shopping malls and highways and traffic jams daily: no wild animal tracks. I have commuted more than 200 miles to work to live here in wilderness.

Unfortunately, on my property in the backyard I have big power lines which I must look through and ignore daily to see Mt. Shasta. Most people who live here do not look through power lines to view the mountain. I assure you, you would not want to have your view marred by these lines if you lived here! We need LESS of this, not more! This project deemed “small” and insignificant to the CPUC and PacifiCorp is significant to me! Mount Shasta is a jewel and deserves special consideration. The *transmission and distribution poles in this project should be UNDERGROUND*.

Crystal Geyser must pay for their share of the upgrade. We all know this upgrade is taking place because Crystal Geyser needs it to operate. I do not know why our county and city officials are shortsighted and have extended a friendly hand to Crystal Geyser for about 15 minimum wage jobs. This small income is not worth the cost in dollars or environmental damage to us who live here. There are many issues which are being ignored by our representatives, so I write this letter to you. I know that Crystal Geyser needs four times more power than the Coca Cola water bottling plant used. They cannot operate without it.

And the additional power is in their production plans. I/we are not anti-growth, we just want changes to occur safely and with care to their appearance. Mt. Shasta is an important international eco-tourism and spiritual destination. Our

C15-1

C15-2

C15-3

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

view will be damaged by poles that are 25 feet higher than the poles present now, affecting our views on I-5, on North and South Old Stage Road, on Lassen Lane, Hatchery Lane, Ream Road, Pine Street, Jessie Street and in town. Both sides of Interstate 5 will be affected.

C15-3
Cont.

If this power station must be built, there are MANY other places that are hidden away it can be built. Further, City and County Ordinances require undergrounding of utilities for new projects. The city owns an old reservoir with 20 acres at the south end of town adjacent to a pacific power easement near the radio station tower. The new substation can be hidden there, and power lines already exist there. If it must be above ground, have such "hidden away" sites been explored? If we must bear the costs, there is little difference if spending 1.2 or 1.6 million dollar to us who are squeezing the most out of five dollars in our purses. Although the CPUC is not required to comply with local and regional ordinances, in sensitive areas like Mount Shasta, our **quality of life should be respected**.

C15-4

I hope the Crystal Geyser Water project will not be approved as proposed, because I live a short walk away and my well may go dry: no plan/ mitigations exists to recompense me should this occur. If it occurs, I will have to buy my water from Crystal Geyser! My property will be worthless. Their plans and operating history in California shows they damage the watershed by polluting and they do not clean up! Many aspects of their profitable plans are not thought out with local people in mind. It appears no compromises are possible because everyone sees this project as either or while more careful planning that costs more would result in a better end result for all of us. The Draft Environmental Impact Report (DEIR) is still a work in progress. Approving the Mitigated Negative Declaration (MND) is premature as the need for greatly increased power may disappear if the project is not approved.

C15-5

I RESPECTFULLY **request a hearing in Mt. Shasta** so that our citizens and tourists can be heard on this issue! None of us can afford to travel to San Francisco to be heard! Please come here [see for yourself] and see why we are so upset about the lack of care in planning the visual impact of this power upgrade/ project.

C15-6

As a taxpayer and ratepayers, I do not want to subsidize Crystal Geyser's profits: please make them pay their fair share of this power upgrade! After this issue is decided, there will be others: road paving, traffic lights, wider roads, turning lanes for trucks. As a community, we will face the issue of who pays for these upgrades also. Let us begin here and now to FAIRLY address these issues! Let Crystal Geyser pay their share of the expenses to accomplish their plans! I have rural land without power: no one else but me will be paying for the power poles that must go to it. Make them pay for theirs; they are not special or hard luck cases!

C15-7

THANK YOU for hearing my concerns.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Sincerely,
Marsha Yates
1208 Everett Memorial Highway
Mt. Shasta, CA 96067
530-925-5760

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C15

**Marsha Yates
December 22, 2016**

- C15-1** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration (IS/MND); therefore, no additional response is provided or required.
- The commenter requests the undergrounding of transmission lines associated with the proposed project. See General Response 2 (GEN2) regarding undergrounding of transmission lines.
- C15-2** The commenter suggests that Crystal Geyser Water Company should pay for the upgrade to the transmission system. Determination of cost is outside the purview of the California Environmental Quality Act (CEQA) process, and no further response is required.
- C15-3** The comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.
- C15-4** The commenter asks why the transmission line cannot be hidden, and indicates that City and County ordinances require undergrounding of utilities. See General Response 4 (GEN4) for a detailed analysis of the relationship between the proposed project and local City and County utility ordinances, which include the undergrounding ordinances.
- C15-5** The commenter raises issues about the Crystal Geyser bottling plant project, but does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.
- C15-6** The commenter requests that a public hearing be held on the proposed project. Requests for hearings lie outside the purview of the CEQA process. The occurrence, location, and timing of any such hearing would be at the discretion of the Administrative Law Judge and the Commissioner assigned to the proceeding.
- C15-7** Please refer to response to comment C15-2.

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Comment Letter C16

From: [John Adamson](#)
To: [Lassen Substation Project](#)
Subject: Lassen Substation Upgrade, Siskiyou County; Open Comment Period
Date: Friday, December 23, 2016 11:44:20 AM

To the CPUC,

My wife and I are retired. Three plus years now. We purchased our retirement house within the incorporated boundaries of Mount Shasta ten years ago this month. My wife is from here: Mt. Shasta High School Class of 1971. My father-in-law's family (he is now deceased) moved from far northern Siskiyou County (Seiad Valley/Hamburg Bar) to Mount Shasta (then Sisson, I believe) around 1900. The last remaining family house is still occupied by the family on the last half acre of their original 140-acre ranch. Needless to say, we have roots.

My wife as a professional architect was a partner in a large local firm and I know of no other architect or firm that is singularly more responsible for a good number of the educational and institutional buildings within the county.

My background is varied. Pertinent to this writing and until our recent retirement, I consulted as a professional private sector environmental/land use planner. I co-authored my first EIR in 1981. At last count (1993) I had co-authored/authored 24 EIRs and combination documents with over 400 "other" environmental documents. I have no idea how many CEQA-related documents and matters I have produced or assisted with since 1993.

I am writing this comment as a frustrated resident rather than a professional consultant. My frustration centers around people that happen to be relatively new to this area and community, are well-monied, and have no consideration for anyone other than themselves. They take a stance that development or growth of any kind, regardless of the purpose, is unacceptable. What I find particularly upsetting is the manner CEQA is abusively used as an obstructionist tool. We have seen this occurring throughout California for a good number of years now with no end in sight. Frankly, I'm exceptionally happy I'm no longer involved in the ridiculous battles with an opposition using nonsensical "logic" and litigation to stonewall infrastructure improvements and upgrades and not to mention the CEQA process.

How quickly people forget the power outage of 2008, if they were even here at that time. True story about a remarkable lady about 80 years of age who is also an old family friend living alone at the time near the central area of downtown Mt. Shasta. Mrs. Dawson had gone without electricity long enough during the storm. She decided to leave her home and stay at a nearby lodge. When she left her front door there was the standard, relatively inaccessible snow berm between her house and the street. While attempting to cross it she fell into a gap in the snow. There she laid on her back unable to free herself or get anyone's attention because of the darkness for the remainder of the night staring at the stars. As she related, she was bundled quite well for the walk to the lodge, so was essentially "fine" until located the next morning. The moral of the story - an elderly electrical customer would not have put themselves into such a precarious position had the system been up-to-date, safe and reliable.

In retirement we did not give it a thought that after our final home purchase we would have to worry about any reliable and safe electrical infrastructure and the necessary improvements that must go with it. Our plan to "return home" to retire is over 30 years strong. Sadly, and I mean very sadly, we have had moments of second thoughts lately to our decision.

I respectfully ask the CPUC to remember and follow your purpose:

"The CPUC serves the public interest by protecting consumers and ensuring the provision of safe, reliable utility service and infrastructure"

It seems pretty apparent the majority of residents need your protection. The Lassen Substation is in great need of improvements and upgrades and of this there is no doubt. Please, do not allow a small group of selfish individuals what they believe is "their right" to place the majority of residents in an unsafe, potentially life threatening position.

Thank you for your consideration and your understanding of my frustration in this matter.

C16-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

John Adamson
1534 Village Way
Mount Shasta, CA 96067
(530) 921-2941
(Please, leave a message and I will return your call)

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C16

**John Adamson
December 23, 2016**

- C16-1** The commenter's support for the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

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Comment Letter C17

From: [Daniel Axelrod](#)
To: [Lassen Substation Project](#)
Subject: Lassen substation
Date: Friday, December 23, 2016 11:43:45 AM
Attachments: [Lassen substation comments.doc](#)

Dear Mr. Rosauer,

I have attached a comment letter on the Lassen substation upgrade and the associated IS/MND for your consideration. Best regards, Daniel Axelrod

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Daniel Axelrod, Ph.D.

2536 Muledeer Dr
Weed, CA 96094
daxelrod@umich.edu

December 23, 2016

Michael Rosauer, Project Manager
California Public Utilities Commission, c/o Dudek
605 Third Street
Encinitas, California 92024

Dear Mr. Rosauer:

I would like to comment on three aspects of the IS/MND for the Pacific Power and Light (PPL) Lassen Substation: (1) apparent **segmentation** of the partially-related unfinished EIR for a major prospective customer, Crystal Geyser Water Company; (2) the desirability of **undergrounding** in this particular region; (3) the balance of the **environment vs need** for this project. I am a Professor Emeritus of Physics of the University of Michigan, Ann Arbor (still engaged in research, mostly by telecommuting), have lived full-time in the Mt. Shasta area since 2003, and have attended the public meeting in Mt. Shasta on this matter on Dec. 7.

C17-1

Segmentation

The IS/MND specifically mentions that a major need for part of the upgrade is to provide increased power to the new Crystal Geyser (CG) plant (not yet operating or even environmentally-approved and currently undergoing an environmental impact study). According to California law, **all** environmental aspects of a project must be reviewed before approval. From the point of view of Pacific Power alone, CG may be just another customer that needs power, and the legal status of a customer may seem irrelevant to PPL's technical plans. But from the point of view of the community in dealing with CG, the upgraded power lines to CG are integral to the CG project and must be considered as a possible major environmental impact of the CG plant, alongside and at the same time as other possible impacts. The various impacts are specifically **NOT** allowed to be viewed separately and in isolation from each other: that is called segmentation. That prohibition against segmentation exists to prevent a project from dodging review of the overall environmental impact by dividing the impact into small parts, each of which seems minor, but cumulatively might be large. Therefore, to approve the CG-related aspects of the PPL project in this IS/MND apart from the overall review of CG violates the spirit, and possibly the letter of the law and may be challenged as such.

C17-2

Undergrounding

The Mount Shasta area's economy depends on tourism. Just one look at the unique and stunning beauty of the area explains that. The economy also relies on retirees attracted to the scenic beauty: the income of retirees flows into the area without their occupying jobs. On the other hand, the Mt. Shasta area is **not** naturally a great place for heavy industry because of the

C17-3

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

rugged topography and winter weather, the distance from seaports and major cities, and lack of high capacity transportation. Upgrading power lines in general may be desirable (and in some cases even necessary), but it must be done here with strong consideration of the economic base of the region. That base here absolutely depends on the incontrovertible and internationally-known scenic beauty. Any infrastructure improvements must be consistent with preserving that economic base. Taller, wider power poles carrying thicker cables seriously detract from the viewshed and will discourage some tourists and some retirees who desire natural scenery in choosing to come here. Undergrounding is more expensive, but would preserve the scenic values while providing the needed service. It would also be immune to weather-induced power failures. (In my immediate area, Hammond Ranch, there have been frequent power failures over the years, some quite extended and most appear to have been weather-related on exposed power lines, particularly from wind, icing, and falling tree branches.)

C17-3
Cont.

Environment vs. need

Any needed new power project necessarily involves some environmental damage. This fact does not preclude new projects. One cannot judge the environmental damage in isolation: it may be necessary to accept some damage if the need is great or dire. Conversely, "need" cannot be considered in isolation: it must be balanced against the environmental consequences. The two aspects are completely and logically coupled. So it is curious that the public is asked to consider the environmental assessment for the substation in complete isolation from its adjudged need. In fact, we are expected to accept the determination of need as a *fait accompli*, done before the PPL environmental assessment was even presented to the public. This determination of need presumably involved consultations between PPL and CG but were not public. That determination of need cannot be considered adequate, especially in the present case, because CG's needs are completely dependent on the outcome of the ongoing EIR, challenges to it, and any resulting mitigations and restrictions. In fact, the determination of need is completely premature, in part because the CG environmental review has not yet been finished. If the final "need" turns out to be adjusted downward as a result of the currently ongoing CEQA process, then the environmental evaluation of the PPL project would correspondingly require adjustment.

C17-4

Summary

For that part of the PPL project that is primarily intended for CG, I am suggesting the following course of action: that approval should be withheld for now, deferred until such time that the future of CG project, including its power requests, is evaluated by its ongoing EIR and subsequently legally validated.

C17-5

Thank you for considering my opinion on this matter.

Sincerely,



Daniel Axelrod

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Response to Comment Letter C17

**Daniel Axelrod
December 23, 2016**

- C17-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.
- C17-2** The commenter raises concerns regarding segmentation (i.e., perceived piecemealing) of the proposed project when considered with the Crystal Geyser bottling plant project (Crystal Geyser project). Please see General Response 1 (GEN1) for a detailed response regarding the independent utility of the proposed substation.
- C17-3** The commenter requests the undergrounding of transmission lines. See General Response 2 (GEN2) regarding undergrounding of transmission lines.
- C17-4** The commenter states that the need for the substation is entirely driven by the Crystal Geyser project. As discussed in GEN1, the California Public Utilities Commission (CPUC) considers the proposed project to have utility outside of the load growth that may be driven by the Crystal Geyser project. As such, the need for the substation can be viewed independently of the Crystal Geyser project.
- C17-5** The commenter's statements about the proposed project are noted and will be included in the administrative record and considered by the CPUC during project deliberation.

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PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C18

From: lber@snowcrest.net
To: [Lassen Substation Project](#)
Cc: [Michael Rosauer <michael.rosauer@cpuc.ca.gov>](mailto:Michael.Rosauer@cpuc.ca.gov); [Robert Haga <robert.haga@cpuc.ca.gov>](mailto:Robert.Haga@cpuc.ca.gov); pod@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 2:33:09 PM

I live in Mount Shasta, very near the proposed Crystal Geyser bottling plant. Mount Shasta is a former timber-industry town, now dependent on regional and international tourism for the bulk of its economic activity. Tourists come for the pristine air and water, diverse outdoor recreational opportunities, small-town experience, and beautiful mountain views. The environmental and aesthetic changes that Crystal Geyser's proposed operations would bring to the area are NOT in harmony with an economic life the town can bet its future upon.

In addition, Crystal Geyser's anticipated needs are so great as to require additional infrastructure. Their extraordinary needs should NOT become the financial burden of local or regional ratepayers. Should Crystal Geyser's requirements be met, it should be completely at their own expense. PacificCorp should not be allowed to spread Crystal Geyser's anticipated portion of the costs of a new substation and transmission lines to local or regional ratepayers in order to gain a large corporate customer who would use four times the amount of power used by its predecessor. For PacificCorp to spread the costs of a substation project necessitated largely by a single special interest is disingenuous and represents a conflict of interest against the larger, diverse body of ratepayers.

There should be a hearing prior to any approval of the Mitigated Negative Declaration. That hearing should take place in Mount Shasta, the area primarily affected by potential construction of the substation and lines, to allow those most affected by the Declaration to easily attend. In addition to the concerns mentioned above, the following points should be considered:

1. The preparation of a Draft Environmental Impact Report for Crystal Geyser's proposed operation is still in progress. Crystal Geyser may not gain approval for their project, obviating the need for the Mitigated Negative Declaration for the substation and transmission and distribution lines.
2. Mount Shasta is a pristine area, with its primary economic activity, tourism, heavily dependent upon aesthetics. City and County ordinances reflect that economic priority. The CPUC should respect local ordinances requiring undergrounding of utilities for new projects.

Very sincerely,
Laura Berryhill

C18-1

C18-2

C18-3

C18-4

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Response to Comment Letter C18

**Laura Berryhill
December 23, 2016**

- C18-1** The commenter suggests that the financial burden of the proposed project should not be borne by local ratepayers, and that, in essence, Crystal Geyser Water Company should pay for the upgrade to the transmission system. Determination of cost and cost distribution are outside the purview of the California Environmental Quality Act (CEQA) process, and is therefore not addressed in the response to comments; no further response is required.
- C18-2** The commenter requests that a public hearing be held on the proposed project. Requests for hearings lies outside the purview of the CEQA process. The occurrence, location, and timing of any such hearing would be at the discretion of the Administrative Law Judge and the Commissioner assigned to the proceeding.
- C18-3** The commenter states that the proposed project would not be required if the Crystal Geyser bottling plant project (Crystal Geyser project) fails to gain its permit. The California Public Utilities Commission has determined that the proposed project has independent utility from the Crystal Geyser project; as such, it is not contingent upon the permitting of the Crystal Geyser project. Please see General Response 1 (GEN1) for a more detailed discussion regarding the relationship between the Crystal Geyser project and the proposed project.
- C18-4** The commenter requests that the proposed replacement transmission line be placed underground, citing local ordinance requirements. Please see General Response 4 (GEN4) for a detailed analysis of the relationship between the proposed project and local City and County utility ordinances.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C19

From: [Molly Brown](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; cc: Robert Haga; pod@cpuc.ca.gov; cam@cpuc.ca.gov
Subject: Regarding the upgrade to PacifiCorp Lassen Substation Project in Mount Shasta
Date: Friday, December 23, 2016 5:06:38 PM

I have lived in Mount Shasta since 2004, drawn by the natural beauty, clean air, and clean water. I am very concerned about industrial incursions into one of the few healthy and beautiful places left on Earth.

My background in psychology and counseling helps me understand the vital role that aesthetics and beauty play in our lives. We are part of nature, and if we only think in terms of economics, we can become crippled spiritually and emotionally.

Financial progress must not rule our lives while the cultural beauty is given little value.

This is especially true in a mountain community where tourists and pilgrims come for nature's Beauty! They come for it in the form of sports, ecological living and spiritual deepening.

This is an opportunity to have the public review the upgrade and maintenance portion of the project. The lines need to be put underground. This should be a major consideration for this particular mountain community. The citizens who live here need to be heard as they are the ones who have been sculpting the direction toward sports and spiritual tourism and ecology for decades.

This upgrade that appears to be primarily to meet the needs of the Crystal Geyser plant. Therefore, the costs should be paid by that corporation.

I do not support multinational corporate bottling of water, because of the plastic waste, use of water in a drought, and the costs to the environment of transportation of the product to market. Privatization of water is wrong because water is a public right. Water is not something to be bought and sold in this way. Again the subject is...what do we value?

This project does not benefit Mount Shasta people. We are a fast growing world tourist

C19-1

C19-2

C19-3

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

destination. The people coming are not coming to see the blight of an immense corporate heavy industry. That is the antithesis of beauty. It goes against the very direction Mount Shasta has been moving for many decades.

Please consult your deepest wisdom and your hearts, not just company bottom lines. Please be the leaders in the emerging world and culture of caring for the the web of life on Earth.

C19-3
Cont.

Sincerely,
Molly Brown

--

Molly Young Brown, M.A., M.Div

722 Meadow Ave Mt Shasta CA 96067

530-926-0986 (phone & fax)

MollyYBrown@gmail.com

MollyYoungBrown.com

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C19

**Molly Young Brown
December 23, 2016**

- C19-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration (IS/MND); therefore, no additional response is provided or required.
- C19-2** The commenter requests the undergrounding of the transmission lines associated with the proposed project; please see General Response 2 (GEN2) regarding undergrounding of transmission lines.
- C19-3** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. Since the comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND, no additional response is provided or required.

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PacifiCorp Lassen Substation Project**

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Comment Letter C20

From: Angelina Cook
To: Lassen Substation Project; michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov; cqm@cpuc.ca.gov
Subject: Comments on Lassen Substation Project MND - Application No. A.15-11-005
Date: Friday, December 23, 2016 4:59:32 PM

*Re: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project
Application No A.15-11-005*

To: LassenSubstation@dudek.com
cc: Michael Rosauer <michael.rosauer@cpuc.ca.gov>
cc: Robert Haga <robert.haga@cpuc.ca.gov>
cc: pod@cpuc.ca.gov
cc: cqm@cpuc.ca.gov

Dear CPUC Staff, Judge Haga and Commissioner Podolinsky,

I am a researcher and program manager for the Mount Shasta Bioregional Ecology Center (MSBEC). My master's degree is in International Environmental Policy, specializing in climate and energy from the Middlebury Institute of International Studies at Monterey.

MSBEC has not had a formal board meeting to address this issue, though I would like to communicate my concerns before your approval of the Mitigated Negative Declaration. I was able to attend the public hearing on Dec. 7. While the case was made for the need of a substation upgrade, many members of our community are concerned that this project will be funded by taxpayers to bolster the viability of Crystal Geyser's bottling project, which is not supported by the majority of local citizens.

My primary concerns are that:

1. The substation upgrade maintains or improves the aesthetics of our majestic surroundings.
2. This upgrade does not enable Crystal Geyser to fragment their project description or piecemeal the environmental review of their pending water / tea / juice bottling operations via government sanctioned corporate welfare.
3. The upgrade does not result in higher net carbon emissions from the Mount Shasta bioregion.

The top 4,000 feet of Mount Shasta has been designated as federally protected by the National Register of Historic Places. (see link: http://www.achp.gov/docs/Section106SuccessStory_MtShasta.pdf). The Volcanic Legacy Scenic Byway (link: <http://www.volcaniclegacybyway.org>) is also federally funded and is

C20-1

C20-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

dedicated to preserving significant viewsheds along Interstate 5. Clearly the introduction of much taller power poles and thicker conduit lines will impair the beauty of the vistas we treasure.

Mount Shasta is a renowned international tourist destination, not an industrial park. Our economy is substantially based on adventure travel, eco tourism and spiritual retreats by visitors seeking respite from urban conditions and replenishment of natural beauty. *Aesthetics must be foremost in requiring under grounding of the power lines. Best practices requires conformity with city and county codes that require under grounding wherever possible.*

Controversy over Crystal Geyser Water Company's power need vs the need of the community for power now and in the foreseeable future is brewing. For three years there have been consistent attempts to approve the project without proper environmental review. Not only do we want to ensure that this power upgrade will be sufficient to sustain the regions growth projections, we want to comply with our regional mandates to reverse anthropogenic climate destabilization and water conservation by averting non-necessary industrial water extraction and carbon emissions. While the State moves forward on AB 32 (climate mitigation) and SGMA (Sustainable Groundwater Management) unregulated industries are continuing business-as-usual full steam ahead.

Without a comprehensive EIR, we are not able to know what kind of power needs Crystal Geyser will require. I urge you to consider delaying any approval of the MND until Crystal Geyser's Draft Environmental Impact Report has been prepared and circulated by Siskiyou County.

In the hearing, I heard that your agency considers this to be a "small and benign" project by comparison with others managed by your agency. I hope you understand the unique conditions of Mount Shasta and Siskiyou County. Delivering headwaters to a significant portion of California, we face extreme economic disadvantage. In our third decade of struggling to recover from our dying timber economies, it is time we recognize that water-bottling will not be an economic replacement for the timber industries. The exploitative economic practices of the 20th century will not see us through the 21st century. It is up to each region to organize locally and cooperate regionally to demonstrate that we can develop responsibly and sustain thriving communities while restoring the ecosystems that support us in the first place.

We are a small mountain community dedicated to the restoration of our healthy source watersheds. We count on the leadership of those in a position to help us protect our resources, for the benefit of everyone who relies on the Sacramento and Klamath Rivers.

C20-2
Cont.

C20-3

C20-4

C20-5

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Respectfully Submitted,

Angelina Cook
516 Shasta Ave.
McCloud CA 96057
(530) 859-2083

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Response to Comment Letter C20

**Angelina Cook
December 23, 2016**

- C20-1** The commenter states that the substation should maintain or improve the aesthetics of the area, that the upgrade should not enable the Crystal Geyser Water Company to fragment that project, and that the proposed project should not result in higher net carbon emissions from the Mount Shasta Bioregion.

Relating to aesthetics, the proposed project's impacts on visual resources are evaluated for potential impacts to scenic resources in Section 5.1, Aesthetics, of the Draft Initial Study/Mitigated Negative Declaration (IS/MND). The California Public Utilities Commission (CPUC) has determined that the project as proposed would have no significant impacts.

The relationship between the proposed project and the Crystal Geyser bottling plant project (Crystal Geyser project) is described in Section 4.2, Project Objectives, and Section 5.18, Mandatory Findings of Significance, of the IS/MND. The independence of the proposed project from the Crystal Geyser project is also discussed in General Response 1 (GEN1).

Impacts related to greenhouse gas (GHG) emissions are analyzed in Section 5.7, Greenhouse Gas Emissions, of the IS/MND. As discussed in Section 5.7, operational activities as a result of the proposed project would be similar to current activities and would not result in a net increase in GHG emissions above existing conditions. Additionally, the project would remove the existing sulfur hexafluoride (SF₆) distribution breakers, which would reduce any potential SF₆ leakage and associated GHG emissions during operation of the proposed project. The only GHG emissions that would be generated as part of project implementation would be during the short-term construction period; those emissions would be approximately 94 metric tons of carbon dioxide equivalent (MT CO₂E) per year when amortized over a conservative 20-year project life. Therefore, there would be a minor increase in GHG emissions as a result of short-term construction activities; however, these emissions would be less than the 900 MT CO₂E screening threshold applied for the purposes of analyzing GHG impacts under the California Environmental Quality Act (CEQA). As discussed in Section 5.7 of the IS/MND, this screening threshold is based on the approach outlined in the California Air Pollution Control Officers Association's report CEQA and Climate Change (CAPCOA 2008).

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

- C20-2** The commenter requests that the proposed replacement transmission lines be placed underground, citing conformity with local ordinance requirements. Please see General Response 4 (GEN4) for a detailed analysis of the application of and relationship between the proposed project and local City and County utility ordinances. In addition, components of the proposed project, including upgrading the transmission line and installing replacement poles, are evaluated for potential impacts to scenic resources in Section 5.1, Aesthetics, of the IS/MND.
- C20-3** The comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.
- C20-4** The CPUC has determined that the proposed project has independent utility from the Crystal Geyser project; as such, the project is not contingent upon the permitting of the Crystal Geyser project. Please see General Response 1 (GEN1) for a more detailed discussion regarding the relationship between the Crystal Geyser project and the proposed project.
- C20-5** The comments on the proposed project are noted and will be included in the administrative record and considered by the CPUC during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C21

From: shanta@shantagabriel.com
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 11:06:25 AM

To Whom it May Concern:

I am forwarding this message because Mary Saint-Marie speaks for me and all my friends in my mountain home of Mt. Shasta. It seems we are be railroaded into circumstances none of us are happy about. There are plenty of industrial areas in Siskiyou County, such as Yreka, where this substation would make no difference. But in Mt. Shasta it is a travesty.

C21-1

Mt. Shasta has been listed as one of the 10 most desirable places to visit on Earth! Travelers from all over the world are coming here to see one of the most majestic mountains and beautiful natural places left in the U.S.

To let a multinational company ruin that for the residents is so far out of alignment with what life means in a place like this, it is overwhelming. I would not say I am against business. I have had my own for over 25 years. However, there is the right business for the right environment. Crystal Geyser is NOT right for Mt. Shasta and they have not complied with any of the requests and rulings so far. If it must be done, put the lines underground and have this billion dollar company pay for it. It is not good for the citizens to have to pay for something that will clearly not benefit them. Thank you for paying attention to a concept of protection of the beauty of a land that will never come back if it is destroyed now. And the citizens of this town will not be able to make their businesses thrive in ecotourism because of it.

C21-2

Sincerely, Shanta Gabriel

Begin forwarded message:

From: Mary Saint-Marie
<marysaintmarie@finestplanet.com>
Subject: Notice of Intent to adopt a Mitigated
Negative Declaration PacifiCorp Lassen
Substation Project Application No A.15-11-005
Date: December 22, 2016 at 10:22:19 AM PST
To: lassensubstation@dudek.com
Cc: michael.rosauer@cpuc.ca.gov,
robert.haga@cpuc.ca.gov, pod@cpuc.ca.gov

Dear CPUC staff, Judge Haga and Commissioner Liz
Podolinsky,

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

*Regarding the upgrade to PacifiCorp Lassen Substation Project in Mount Shasta:

I moved to Mount Shasta in 1974. I am an artist and performance artist who loves beauty. I deeply understand and value what Beauty brings to the lives of everyone on the planet. It is an intrinsic value of all hearts everywhere. Aesthetics and Beauty must be in balance with the practical aspects in our lives. We are part of nature.

Financial progress must not rule our lives while the cultural beauty is given little value.

The balanced yin and yang of the planetary expression is not idle philosophy. It is an active, universal, inviolate law of balance in all of nature. The Voice of Beauty is relevant.

It is relevant especially in a mountain community where tourists and pilgrims come for nature's Beauty! They come for it in the form of sports, ecological living and spiritual deepening.

This is an opportunity to have the public review the upgrade and maintenance portion of the project. The lines need to be put underground. This should be a major consideration for this particular mountain community.

A good way to begin this would be to call a public hearing. The citizens who live here need to be heard as they are the ones who have been sculpting the direction toward sports and spiritual tourism and ecology for decades.

*About the payment for this upgrade that appears to be clearly for Crystal Geyser:

First of all, I will say that I do not support multinational corporate bottling of water at all. Especially in plastic. And in a drought. And having it shipped to Japan. Privatization of water clearly destroys the idea that water is a public right. Water is not something to be bought and sold in this way. Again the subject is...what do we value?

Secondly, I would say that if the Crystal Geyser does pass the EIR and does get to open, they should pay for their portion of this project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

That seems so obvious, since
they are the ones who benefit.

This project does not benefit Mount Shasta people. We
are a fast growing world tourist
destination. The people coming are not coming to see
the blight of an immense
corporate heavy industry. That is the antithesis of
beauty. It goes against the very
direction Mount Shasta has been flowing, as a tourist
destination, for many decades.

Now is the time to go deeply into your hearts and be
the leaders in the emerging world
and culture of caring for the universal law of balance in
all of nature.

Now is the time to be caring of our earth.

Now is the Time.

In Beauty,

Mary Saint-Marie

----- End of Forwarded Message

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C21

**Shanta Gabriel
December 23, 2016**

- C21-1** The commenter questions why the substation has to be in Mount Shasta. A substation cannot be located too far from the load that it serves because the line losses would become prohibitive; that is, the system would be highly inefficient, it would be difficult to maintain grid synchronization, and the system would be subject to loss of electricity due to resistance in the wires. Consequently, the selection of a site adjacent to the existing substation is appropriate since it would not reduce the efficiency of the system overall.
- C21-2** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C22

From: [Beverly Jean Harlan](#)
To: [Lassen Substation Project](#)
Cc: [Michael Rosauer](#); [Robert Haga](#); pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 11:09:16 AM

To Whom It May Concern:

I moved to Mount Shasta 7 years ago from the San Francisco Bay Area when I retired from teaching music. I have two degrees in Music Education and two California life teaching credentials. Although the SF Bay Area is an exciting place to live, I was ready to have a quieter and calmer life style. There is no other place on Earth where I would like to live.

Why does Crystal Geyser [CG] want our water?

This community is an international tourist attraction.
Our main economy is based on tourists.
Are they concerned about increasing the declining tourist economy of Mount Shasta?

No.

Are they concerned about providing jobs to our local residents?

No.

Are they concerned that the wells of local residents might run dry and/or contain particles of dirt as a result of their taking huge amounts of our water?

No.

Are they concerned that our sewage system would become overloaded as a result of their producing four times more sewage than the system can presently handle?

No.

Are they concerned that local residents might be required to foot the bill of their greatly increased use of our sewer system?

No.

CG should pay for any upgrading costs of our sewage system that might be required.

C22-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Are they concerned about the unsightly telephone and power line poles that would be needed?

No.

Have they offered to pay for running the power lines underground as would normally be done in such a situation in order to preserve our precious viewshed?

No.

They are not concerned about any of these things.

It is obvious to me, and to many other alert citizens, that CG wants our water because their Number One concern is about increasing the profits of Otsuka and CG.

Those who are awake to the signs of the changing times know that life on Earth cannot continue to exist if this kind of self-serving, short-sighted attitude is allowed to continue to prevail over concern for the natural resources of Earth and the health and safety of its citizens.

Our planet literally can no longer tolerate such selfish approaches to any aspect of life on Earth.

Beverly Harlan
1020 Kingston Road, Apt 3K
Mount Shasta, CA 96067

C22-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C22

**Beverly Jean Harlan
December 23, 2016**

- C22-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Comment Letter C23

From: [rhea.harlow](mailto:rhea.harlow@dudek.com)
To: [Lassen Substation Project](#); michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Lassen Substation Concerns
Date: Friday, December 23, 2016 1:17:25 PM

RE:
*Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen
Substation Project
Application No A.15-11-005*

To: LassenSubstation@dudek.com
cc: Michael Rosauer <michael.rosauer@cpuc.ca.gov>
cc: Robert Haga <robert.haga@cpuc.ca.gov>
cc: pod@cpuc.ca.gov

Dear Friends of Mt. Shasta:

I am writing this email due to concerns that I have regarding the upgrade of the Lassen Substation in our community. I moved to Mt. Shasta approximately 5 years ago, having visited many times and found it to be a pristine environment with a small town.

My first concern regarding the upgrade is one of devaluing property and disturbing the view of our sacred mountain. Many who live here, came here precisely for the view, the air, the clean environment and the smallness of the community. I am not against the upgrade. I am against a proposal that does not take into effect the needs of the community. I do believe that this entire operation could be completed underground, especially since it appears that a large portion of the work will be underground (specifically the section below Highway 5). It is interesting to me that the highway gets more money and support than the rest of our community, in terms of the appearance of more poles and cables to support this project.

My second concern is the cost. I am in favor of paying more to keep our environment as beautiful as possible and I understand that the costs will be increased for underground work. However, there has been no estimate for the additional costs that are a direct result of the Crystal Geyser Plant coming into our community. As a logical person, I would guess that the extent of the upgrade, as well as, the additional costs would be largely related to this plant's needs. Therefore, I believe that a very clear accounting of what is involved in the upgrade and how it is impacted specifically by Crystal Geysers needs be included in the costs. Also, these additional costs should be borne by Crystal Geyser directly, not the citizens of Mt. Shasta.

My last concern is that I find myself to be flummoxed by all the governmental

C23-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

agencies that so far have not stepped up and required a full EIR. Agencies of local city, county and the environment, in my mind have not done due diligence regarding all aspects of proposed upgrades for the Lassen Project and the Crystal Geyser Plant. I am including the proposed CG plant with this Lassen Project, because I believe that it has a significant impact on how the Lassen Project will proceed.

Thank you for time and attention to my concerns. I am hopeful that all will be accomplished for the betterment of the citizens, the community at large and our precious water systems.

Sincerely,

Rhea Harlow

Sent from Windows Mail



C23-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C23

**Rhea Harlow
December 23, 2016**

- C23-1** The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The commenter raises concerns regarding the devaluation of property and reduction in quality of visual resources, specifically requesting the undergrounding of the transmission lines associated with the proposed project.

Property devaluation is not addressed within the California Environmental Quality Act (CEQA) unless there is evidence that devaluation would result in an impact to the physical environment. Since there is no evidence of such an impact, devaluation is not assessed as part of the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed project, and no further response is necessary.

Under CEQA, there would be no potentially significant impacts to aesthetic resources related to the transmission lines. Please see General Response 2 (GEN2) for a more detailed response regarding undergrounding of transmission lines.

The commenter requests more detailed accounting for the cost of the project, including a clear understanding of how the cost relates to the Crystal Geyser bottling plant project (Crystal Geyser project). Determination of cost is outside the purview of the CEQA process; therefore, it is not addressed as part of the response to comments. No further response is required.

The comment regarding the interrelationship between the proposed project and the Crystal Geyser project does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required. Please see General Response 1 (GEN1) for a more detailed discussion regarding the relationship between the Crystal Geyser project and the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Comment Letter C24

From: [Tom Hesselden](#)
To: [Lassen Substation Project](#)
Cc: [Monte Mendenhall \(monte.mendenhall@pacificcorp.com\)](#); [Ted Palfini](#); [Joe Wirth](#); [Richard Lucas](#); [Jill Harris](#)
Subject: Lassen Substation
Date: Friday, December 23, 2016 1:39:30 PM

Dear Mr. Rosauer,

Please accept the following comments on Pacific Power's proposed upgrades to its electrical infrastructure within and adjacent to Mount Shasta City, California. I am submitting these comments as an individual, but am interfacing with various other interested parties, with the hope of identifying reasonable solutions to visual quality and wetland impacts while also providing adequate and reliable power service to our area, as described in more detail below.

My background relating to the proposed project is as follows:

- I prepared a wetland mitigation plan for Morgan-Merrill Developers in 1990 that included the large meadow on the south side of Hatchery Lane through which the existing transmission lines are routed. The meadow is adjacent to the existing substation.
- I prepared an integrated facilities expansion plan, wetland/stormwater mitigation plan, and outdoor healing facility design at Mercy Medical Center Mount Shasta in the early 1990s, through which underground and overhead distribution lines are routed. Working with Pacific Power, we re-routed one of the underground lines to make room for a pond that was part of the mitigation and outdoor healing design. I also included in the design a trail extending through the hospital campus and tying-in to the downtown area to the south and a city park to the north, called the Downtown-to-City-Park Trail. This proposed trail route passes a location behind George Washington Manor where underground lines transition to overhead lines on the way to the northern portion of the City and vicinity (now including the Crystal Geyser facility). The land crossed by the overhead lines is one of the hospital's wetland mitigation sites. We had discussed at that time the desirability of extending the underground lines beyond the proposed trail location in order to improve views of Mount Shasta from the proposed trail.
- I am currently working on building-out the Downtown-to-City-Park Trail with a group of partners including the Mount Shasta Trail Association, Siskiyou Land Trust, Mount Shasta Rotary Club, Mount Shasta Recreation and Parks District, Crystal Geyser, City of Mount Shasta, and other groups. The timing is excellent for also undergrounding the distribution lines in the vicinity of the trail.
- I am also currently working with these partners on preparation of a Mount Shasta Greenway Master Plan that integrates multi-use trail development, stream and wetland restoration, urban stormwater runoff mitigation, openspace protection, and visual quality improvements. Routing of power and other utilities through greenway areas is a key consideration of the project.

C24-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Based on the above background, I would like to offer the following recommendations regarding the proposed Lassen Substation Project:

1. After constructing the new substation at the adjacent non-wetland site, the site of the existing substation should be fully restored to wet meadow, which is what existed at the site prior to construction of the existing substation. This restoration could be used as mitigation for other project components that result in temporary and/or permanent wetland impacts. If any additional wetland mitigation ends up being required for the Substation Project, we can provide opportunities at other locations as part of the Greenway Project.
2. Explore the feasibility, costs, and potential funding sources of undergrounding the portion of transmission lines that are currently proposed for upgrades. Rather than undergrounding through the meadows on the north and south sides of Hatchery Lane, consider following Indian Lane and Old Stage Road to avoid wetlands. The landowner along those roads is the Merrill family (Morgan-Merrill Developers), and they would greatly benefit from having the transmission lines removed from the view of Mount Shasta from their property, so it is very likely that they would grant an easement for the underground lines.
3. Where re-routing of existing underground distribution lines are proposed by George Washington Manor, extend the underground lines to at least the railroad tracks, if not all the way to Crystal Geyser.
4. Explore the feasibility of undergrounding distribution lines that are proposed for overhead crossing of I-5 at Lassen Lane and Lake Street, to further improve the viewshed.
5. Move ahead with building the new substation now, while exploring the feasibility of underground all or portions of the transmission and/or distribution lines within the project area. In other words, consider phasing the project so that there are opportunities for a more thorough consideration of design options relating to the powerlines portion of the project, rather than building it all out at one time as currently designed. Certainly the cost of pole and wire replacement through the meadows would be considerable, and this cost could be applied to undergrounding if additional sources of funding can be found.
6. Include an upgrade of power service to the old Roseburg Mill Site (now called The Landing) at the south end of the City. Lack of utilities at this site has hampered opportunities for commercial, residential, and recreational development at this site.

Thank you for the opportunity to provide comments. Please contact me if you have any questions or want more information on the various other projects I mentioned above.

Tom

Tom Hesseldenz, Owner/Principal
Tom Hesseldenz & Associates
Ecological Landscape Architecture
CA License #2018
Post Office Box 202

C24-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Mount Shasta, CA 96067
(530) 926-2184
(530) 598-2802 (Mobile)
(530) 926-1830 (FAX)

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Response to Comment Letter C24

**Tom Hesseldenz
December 23, 2016**

- C24-1** The comments on the proposed project are noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comments do not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

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PacifiCorp Lassen Substation Project**

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Comment Letter C25

From: [Ana Holub](#)
To: [Lassen Substation Project](#); michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 12:19:47 PM

To whom it may concern,

I have been a resident and landowner in Mount Shasta for the past thirty years. Before that, I came here often as a recreational and spiritual tourist. The vast beauty of the area drew me in, as it has for countless others. Because I love this land and this community, I feel compelled to write about the current PacifiCorp Lassen Substation Project.

Over the years, I have been saddened by and angry about the lack of local governmental oversight of the water in this bioregion, despite grassroots citizen action. Water extraction has grown over time with very little control. Now, we find ourselves in a situation in which we have no idea how much Crystal Geyser will take from our water supply and have little recourse if there's a problem. They don't even need a permit (!) and now they want us to foot the bill for enlarging the power facility.

- Crystal Geyser should pay for any enlargement it needs beyond the basic needs of the residents and existing small businesses here.

- We should all be focusing on resource conservation rather than enlarging the substation.

- Views and natural beauty are of paramount importance in our area, both for residents and the tourist industry. Therefore, any expansion should be done underground.

Thank you,
Ana Holub



--
Ana Holub, MA • Clear Path To Peace, Author of *Forgive and Be Free: A Step-by-Step Guide to Release, Healing and Higher Consciousness*
www.anaholub.com • info@anaholub.com
530-925-1081 PST
P.O. Box 174, Mount Shasta, CA 96067

C25-1

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Response to Comment Letter C25

**Ana Holub
December 23, 2016**

C25-1 The comments regarding Crystal Geyser, local water supply, and expansion costs responsibility do not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

Please refer to General Response 3 (GEN3) regarding the proposed project and its potential impacts to aesthetic resources. Also, the commenter requests that the proposed replacement transmission line be placed underground. Please refer to General Response 4 (GEN4) for a detailed analysis of the relationship between the proposed project and local City and County utility ordinances, including undergrounding policies.

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Comment Letter C26

From: [JOA](#)
To: [Michael Rosauer](#); [Robert Haga](#); [Lassen Substation Project](#); pod@cpuc.ca.gov; cgm@cpuc.ca.gov
Cc: [Dawn and Jane Roberts](#)
Subject: Lassen Substation Project
Date: Friday, December 23, 2016 9:20:03 PM

Dear CPUC staff, Judge Haga and Commissioner Liz Podolinsky,

*Regarding the upgrade to PacifiCorp Lassen Substation Project in Mount Shasta:

I have been a citizen of Mount Shasta City for 20 years. I own two businesses, Mt. Shasta Taxi (formerly Shasta Shuttle) and the University of Mount Shasta. My life focus for this area is to help our community grow into its natural purpose. Most everyone came here because of the beauty and special energy Mt. Shasta is known for. I have been consistently disappointed with our city and county government who seem to not care about the people's interests.

We want economic development, but not at the cost of our environment and to worker safety.

The tourist industry continues to grow, but our city officials have refused to move forward with a cultural center., which can make us much more money.

Instead they have wasted our money on water Bottling plants that steal our water, put it into plastic to be drank one time before dropped into a landfill (hopefully).

You will have to change your strategy which lacks consciousness and support of the majority of people who live here, or you will continue to only generate conflict with us. If you believe in democracy, you must listen so we can come together with a vision for our area that we can all agree on, like Ashland Or. did.

We all know The "Lassen" Substation is just for Crystal Geyser. I speak for the majority. WE ARE AGAINST IT!

WE WILL NOT SELL OUT OUR RESOURCES TO FOREIGN INVADERS.

IF YOU WANT TO KEEP YOUR JOB, LISTEN TO THE PEOPLE NOW!

Joa Janakoayas

C26-1

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Response to Comment Letter C26

**Joa Janakoayas
December 23, 2016**

- C26-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The comments on the proposed project are noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

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Comment Letter C27

From: [Carol Jenkins](#)
To: [Lassen Substation Project](#); michael.rosaurer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Re: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project. Application No. A 15-11-005
Date: Friday, December 23, 2016 9:32:15 AM
Attachments: [Instagram Icon LargeWEBREADY.jpg](#)

To whom it may concern,
Mt. Shasta and the surrounding area is celebrated by residents and visitors alike for its pristine beauty, vistas, clean air and clean water. Marring that beauty with big utility poles would be harmful to the tourism our town depends on and the way of life our residents support. The cost of upgrading our utilities for the Crystal Geyser plant should never be passed on to the residents of Mt. Shasta. It is the responsibility of the Crystal Geyser corporation alone. And the additional power lines must be buried underground to preserve what all of us treasure about our home: its natural beauty and grandeur.
Thank you,
Carol Jenkins, Ph.D.

C27-1

[CarolJenkinsPhD.com](#)
[CarolJenkinsArt.com](#)
 [CarolJenkinsStudio](#)

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Response to Comment Letter C27

**Carol Jenkins
December 23, 2016**

C27-1 Please refer to General Response 3 (GEN3) regarding the proposed project and potential impacts to aesthetic resources.

The comment regarding Crystal Geyser does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

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PacifiCorp Lassen Substation Project**

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Comment Letter C28

From: [Bill K](#)
To: [Lassen Substation Project](#)
Cc: cam@cpuc.ca.gov; pod@cpuc.ca.gov; robert.haga@cpuc.ca.gov; michael.rosauer@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 5:30:17 PM

To Whom It May Concern,

I live off of South Old Stage Road and pass the Lassen substation every day. I am strongly opposed to the expansion of the substation. Mt Shasta is an eco-friendly, beautiful destination for people who come to experience nature, and escape the pollution visual and otherwise. It seems this is over reach for an area with no large industry, except for the proposed Crystal Geyser Plant, which has not yet been given a final permit. If this substation is in fact being upgraded to support that project, which I oppose, they must at least be required to acknowledge this and pay for it. I am very concerned and urge you to take into account the view shed and the actual requirements for power in our town. If it is truly necessary, the new utilities should be underground to keep from further disrupting the peace and beauty of this place.

Thank you.

Bill Korbel

C28-1

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Response to Comment Letter C28

**Bill Korbel
December 23, 2016**

- C28-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Comment Letter C29

From: [Kate Korbelt](#)
To: [Lassen Substation Project](#)
Cc: [cpuc.ca.gov](#); [pod@cpuc.ca.gov](#); [robert.haga@cpuc.ca.gov](#); [michael.rosauer@cpuc.ca.gov](#)
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 5:33:18 PM

To Whom It May Concern,

I moved to Mt Shasta in 2001 because of the clean environment, the clean water and the beauty and simplicity of life. I live near South Old Stage Road and pass the current substation every day. I am strongly opposed to the expansion of this substation. Mt Shasta is an eco-friendly, beautiful destination for people who come to experience nature, and escape pollution, visual and otherwise. It seems this is over reach for an area with no large industry, except for the proposed Crystal Geyser Plant, which has not yet been given a final permit. If this substation is in fact being upgraded to support that project, which I oppose, they must at least be required to acknowledge this and pay for it. I am very concerned and urge you to take into account the view shed and the actual requirements for power in our town. If it is truly necessary, the new utilities should be underground to keep from further disrupting the peace and beauty of this place.

C29-1

Thank you.

Kate Korbelt

Envision the Life of Your Dreams and
DREAM BIG

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Response to Comment Letter C29

**Kate Korbel
December 23, 2016**

- C29-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

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Comment Letter C30

From: [Victoria Lee](#)
To: [Lassen Substation Project](#)
Subject: Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 12:08:36 PM

To: LassenSubstation@dudek.com
cc: Michael Rosauer <michael.rosauer@cpuc.ca.gov>
cc: Robert Haga <robert.haga@cpuc.ca.gov>
cc: pod@cpuc.ca.gov

To: LassenSubstation@dudek.com
cc: Michael Rosauer Michael rosauer@cpuc.ca.gov
cc: Robert Haga robert.haga@cpuc.ca.gov
cc: pod@cpuc.ca.gov

Re: *Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen
Substation Project*

Application No A.15-11-005

To Whom it May Concern,

As a resident of this community, Mount Shasta's pristine beauty and sublime vistas are of prime concern. It is why I moved to this area. If we must have this bottling plant, then Crystal Geyser should honor the tourist industry needs for scenic views and all utility wiring should be underground.

In addition, the costs for upgrading to the local power grid should not be passed on to residents of this area. If Crystal Geyser is requiring significantly more power than the previous owner, Coca Cola, then it is imperative that Crystal Geyser pay for the upgrades and they not be passed on to the rest of us living here.

Please consider the best practices of undergrounding utilities in our beautiful area. So many people come from all over the world to enjoy the breathtaking views. Additional power poles above ground will be a huge distraction.

Thank you for your consideration.

Victoria Lee
Mount Shasta Resident

C30-1

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C30

**Victoria Lee
December 23, 2016**

- C30-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

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Comment Letter C31

From: [Tracie Lin](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Crystal Geyser and Lassen Substation
Date: Friday, December 23, 2016 11:33:33 AM

To Whom It May Concern:

I have written and expressed my sentiment about Crystal Geyser's plan to extract the pristine Mount Shasta water to sell for corporate profit back in July this year. I have included a copy of the letter again below to reiterate my perspective. Now that Crystal Geyser have agreed to an full EIR, it only makes sense that any plans to upgrade the electrical needs of the facility should be held off until a full evaluation of the EIR takes place. Proceeding with the upgrade and making the local residents pay for the cost of such infrastructure purely benefits the multinational corporation and adds unnecessary burden to the rural community.

The water protectors at Standing Rock, ND have demonstrated the power of people against corporate greed when they come together for common good. I trust that you will make the best judgment for the good of protection of beautiful Mother Earth and all her inhabitants. Water is Life.

Thank you for your attention.

Sincerely,

Tracie Lin

P.S. Below is the letter I sent on July 12, 2016

County of Siskiyou
Community Development Department
c/o: Greg Plucker, Director
806 S. Main St.
Yreka, CA 96097

Date: July 12, 2016

Dear Mr. Greg Plucker:

We are writing to you to express our deep concerns about the mega corporation of Crystal Geyser setting up a water bottling plant in our community. It is well known that California has suffered unprecedented drought over the last 4 years and almost all of California had to endure tremendous cut back on water usage. No doubt this has had a dramatic impact on the agricultural industry and the environment as a whole. Scientists say that even though the El Nino helped the water level a bit this year, it will still take years to recover from the 4 years of drought. And it's possible that California might still be hit with more droughts in the future.

That is why it's utterly enraging that somebody would even be allowed to come into California, take her precious water, pollute the environment further by manufacturing millions of plastic bottles, put the water in those bottles and sell them for profit, especially when the

C31-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

water they are taking belongs to the sacred Mount Shasta. In this day and age, where every emphasis should be about going green and protecting our planet from further unnecessary pollution, this water plant operation will no doubt produce unimaginable air pollution, water pollution, neighborhood noise, and possible depletion of the precious aquifer of our beautiful and serene Mount Shasta community.

Putting such sacred water from the mountains of drought stricken California in plastic bottles to be sold for profit elsewhere is something so defying logic and reasoning that all of us Californians should be vehemently against. We want to strongly urge the county to seriously consider the devastating consequences to the environment if such a plant is allowed to be in operation.

Thank you for your attention to this letter.

Sincerely,

Tracie Lin
Upton Highland Community
1355 North Ridge Dr. Mount Shasta, CA 96067

↑
C31-1
Cont.
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C31

**Tracie Lin
December 23, 2016**

C31-1 The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

As discussed in General Response 1 (GEN1), the proposed project has utility independent of the Crystal Geyser bottling plant project (Crystal Geyser project); as such, there is no requirement for the Crystal Geyser project to be completed prior to the decision to construct the proposed project.

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Comment Letter C32

From: [Gaylin Linx](#)
To: [Lassen Substation Project](#); cc: [Michael Rosauer](#); cc: [Robert Haga](#)
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 5:32:04 PM

To Whom It May Concern:

I am a citizen of The City of Mount Shasta since 1988, and a Californian since 1970. My childhood and school days were with our parents' families in Rhode Island, and the Pennsylvania settlement of Nazareth, in the Lehigh Valley, not far from the Delaware Water Gap.

I am steeped in the history of our colonies and our Declaration of Independence and the building of our constitution.

My first visits to Mt. Shasta were to pray for Mother Earth with Charlie Thom, my Medicine Man. My Buddhist Shakku-Buku parent was among a set of young men who, in the early 1980's, prayed with Charlie Thom at his ancestral sweat-lodge situation on Mount Shasta, at Panther Creek; down-stream from Panther Spring.

Before we two moved, in 1988, from San Anselmo, Marin County, CA to Mt. Shasta, we traveled to the Head Temple of the Nichiren Buddhism we were practicing.

We two traveled by ourselves. We presented ourselves to the administration of The Soka Gakai in Tokyo, with gifts for President Ikeda. We presented ourselves and our credentials to allow us 3-day passes onto the grounds of Tai-Seki-Ji Temple, near Fujinomiya, Japan.

When we first approached our reserved room at The Fujinomiya Grand Hotel, we were astonished at the grand gateway sculpture presented in the outer-lobby. On the left, a mutilated crystal of monumental proportion upon a sturdy pedestal supporting its weight - seeming to be in the thousands of pounds.

On the right side of this first lobby, we found ourselves next to a sculpture from manzanita wood; which grows all over our Mt. Shasta forests and grasslands. The image: a classical "American Indian" with head-to-toe feathered headdress, on bended knee, poising an arrow to his bow, ready for flight toward enemy or prey.

Because of this personal experience, of a Japanese appreciation of native, earthy traditions in our Mt. Shasta region, I have a sense that we two corporations, The City of Mount Shasta, Incorporated and Utsoka Pharmaceuticals, Incorporated can begin to create common ground.

My story is important because I, like many a sturdy child who wishes for freedom, wonders how to survive on her own. I, like many children, looked to our original people for guidance upon "How To Live Without Modern Machines".

C32-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

The up-grading of the power transfer sub-station owned and operated by Pacific Power, previously owned by Scottish Power (Yes, of the Scotland still a part of The United Kingdom of Great Britain) must support our tourism industry, follow case-law set by law court results from the law-suit brought by a Mount Shasta citizens group in the mid 1980's, serve our scenic wilderness tourism industry, and re-name the sub-station to reflect its TRUE GeoGRAPHY.

The Earth.

The Earth is our Mother.

Our oxygen comes from our living earth mother.
Our water is incubated underground in the necessary underground part of the complete water cycle.

My first experience of our Original-Peoples' sweat-lodge purification ceremony has contributed to my story of becoming comfortable with imagining I can survive on The Earth. Our group of dance students arranged a sweat-lodge ceremony on Baker Beach, on the North West side of The Golden Gate Bridge at the entrance of San Francisco Bay.

I am a girl a little afraid for my own survival; lung problems my body-response.

Our sweat lodge ?Shaman? ?Mistress?, was a local Southern Marin woman, who trained among the Huichol Indians to lead sweat lodge purification ceremonies. We cleanse ourselves, in order to be "present" to pray for Mother Earth.

We had the grand privilege of a permit for the lodge on The Pacific Ocean Beach, where fresh water flows into the ocean. We brought everything we needed. Logs for the fire, tarps for the lodge, cornmeal for laying our the shape of the lodge, stones for heating in the fire for carrying into the lodge to create the heat, which is steamed by the Lodge Master with water poured onto the red-hot stones.

There were not too many of us who "cheated" by putting their heads out from under the sheltering tarp.

My Grand TakeAway: "Following directions for when the heat gets too intense: getting my mouth and nose next to the earth, I am relaxed for the first time in my adult life.

Behold! I could feel oxygen bubbling up from the sandy earth.

Now I am a Child Of Earth. Before, I made-up that our air came from space, the atmosphere, overhead. Now I understand. Now I embody our life's breath arising from our earth.

SO ~ Our Mount Shasta is just about the same height as Mount Fuji.

C32-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Mount Fuji is important because it is a Japanese corporation who wishes to be a partner with us in taking care of the SouthWest side of Our Mount Shasta.

However, Our Mount Shasta is almost unknown, compared to the thousands and thousands of years of the royalty and inspiration bestowed by Mount Fuji upon the people of Japan.

Fuji arises from the flat plain in full view of the sailing ships that cross the Southern Coast of the big island.

Our Mount Shasta has been largely unseen and unknown. It was only in the late 1960's when the national freeway system (which was begun in the late 1950's in the eastern U.S.), finally came to Northern California to join Mexico to Canada with a ribbon of smooth highway/freeway. This freeway/throughway is Interstate 5, which now brings the new valance of the 70-mile-an-hour-traffic passing The City of Mount Shasta.

One of our Mt.Shasta City entrepreneurs says "We Are Fishing Off I-5!".

Our scene is what we sell.

Please allow for the most elegant vista possible from your new Sub-Station.

In the early 1990's, we created The Siskiyou Land Trust to help buy land and conservation easements to protect View Corridors for Our Mount Shasta.

In the mid-1980's, a group of Mt. Shasta citizens brought, supported, and won a landmark legal case Preserving, under The General Plan for The City of Mount Shasta, the West Side of the City of Mount Shasta's Sphere Of Influence from development under The General Plan for The City of Mount Shasta.

In the late 1980's, early 1990's,'s many citizens demanded that the development of the Burger King Restaurant at the Lake Street Entrance to town from the I-5 Freeway follow the city's design review ordinance. This planning rule featured design elements specifying local building materials and mountain-themed architecture.

The citizen group dictated that The Burger King property be engineered for the wetlands upon which it would be/is situated. The group also re-designed the access with the potential traffic light AND Re-designed the Burger King access to support connection to Morgan Way at The Mount Shasta Shopping Center across Lake Street. The Lake Street median was designed for eventual build-out when the traffic light would be eventually installed.

These are only a few examples of how our few citizens keep active for Our Mount Shasta wild and scenic land.

I believe we need our wilderness area, where nature is free to be, So that we can know the health of Our Mother Earth. And so we can learn

C32-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

what is so with the earth. What is happening in the places we humans do not keep our pathways.

The new electrical transmission sub-station should be in tune with stewardship of the highest order.

In the early '90's, I was the founding secretary of The Siskiyou Land Trust. I believe the Land Trust owns a Conservation Easement on the land adjoining the Mt. Shasta Substation/Proposed Lassen Substation.

I, and Elizabeth Byerly of the Trust For Public Land in San Francisco walked the landscape of the Merrill Meadow with engineers with CH2M Hill engineers in Redding, CA for the purposes of evaluations for creating the easement with the landowners, Merrill Family Trust.

The HUGE tall electric wiring tower-spires in your plan must be superceded in your plans with under grounded lines, to keep the spirt and letter of the law (No-Development-On-The West side of Lake Street Exit, I-5), as adjudicated in the lawsuit won by our citizen group in the late 1980's. *The many transmission and distribution poles in the plan should be placed underground.*

I am one of the guardians of what our CityMountain needs from her humans for her continued good health. The magic of the mountain is guaranteed by the Wilderness Area adjuacataed around the summit.

We of my age-cohort have been active in planning and design to keep the wild and scenic vistas for our mountain environment.

I have seen The City of Mount Shasta evolve itself.

These days, we have the small town's economic flow: going from brick and mortar stores on The Boulevard to tatoo parlors, vape shops, and medical cannabis stores among the eateries, the boutiques and local art, technology and forest businesses. We must continue to keep our design plans for the beautyof our landscape.

We know that Crystal Geyser needs four times more power than the Coca Cola water bottling plant used because of planned production involving brewing of teas, production of plastics and cooling of the building. I have heard that we have a letter written by Senator Dianne Feinstein stating that the Crystal Geyser project will bring in a new power substation to the area to accommodate their new production plans.

We in Siskiyou County are designated a "frontier county". We must fence our properties, because our county is free-range .Cattle and animals are free to roam.

As the catalyst for big power necessity, Crystal Geyser must bear the costs to pay for upgrades to the local power grid necessitated by their operation. Crystal Geyser must honor our tourist industry need for scenic views. Additional utility wiring should be undergrounded.

We expect respect for the tone of our scenic/wilderness tourist economy. It is important that the tourist industry here be protected. Undergrounding power lines is possible and necessary.

C32-1
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

We also need a promise, in writing, from Pacific Power that the sub-station will again be named Mt. Shasta Sub-Station. Lassen is a County far to the South. Mt. Lassen is the most Southerly in the Cascade Range, many miles to the South. Geographical naming must take precedence to whatever paradigm Pacific Power is following in deciding the power sub-station upgrade be named Lassen,

Thanks for trust building within the community you serve.

Remember when power companies were Public Utilities?

Sincerely,
Gayin Linx,

M.S. Education, Intern Teaching Program for College Graduates
Temple University, Philadelphia, PA

RE:

***Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen
Substation Project***

Application No A.15-11-005

Gayin Linx

"Planetary Life~Cycle Planning
For Water,
Because
We All Live Down~~Stream"

C32-1
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Response to Comment Letter C32

**Gayin Linx
December 23, 2016**

- C32-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C33

From: [dori.mondon](#)
To: [Lassen Substation Project](#)
Cc: [cc: Michael Rosauer](#); [cc: Robert Haga](#); [pod@cpuc.ca.gov](#); [cgm@cpuc.ca.gov](#)
Subject: Re: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application
No A.15-11-005
Date: Friday, December 23, 2016 6:24:02 PM

Hello.

I am a four year resident of Mount Shasta, California.

I moved here for fresh air and clean water. I was born near Detroit, Michigan and spent most of my life outside of Atlanta, and in New York City. Needless to say, this is exactly everything I did not have growing up, and that is WHY I came here to raise my little girl. It is pristine here, and I am at the envy of many of my friends for finding a way in which to maintain a life in this mountain paradise. My daughter loves growing up here, and our community is amazing.

needless to say, i am not a fan of Crystal Geyser's presence here and I am also aware that they are the main reason for this requested upgrade - as this corporation attempts to take more and more from us - including groundwater, air quality, and the tranquility of our mountain hamlet - while really honestly giving back nothing that could possibly compare to what they would like to take, asking us residents to then PAY for this upgrade is yet another slap in the face to those of us seeking to protect this place for future generations. All of this mars this beauty.

Thanks to things like hi-speed internet, there are many people just like me who are now moving here and making Mount Shasta home - we are spiritually-minded, ecologically-minded, technologically savvy and well-educated. many of us are self-employed, certainly no strangers to enterprise - and we also see clearly when it is it, and should not, be "business as usual". this is one such case.

This upgrade project does not benefit the people of Mount Shasta and we are all very well aware of that. It would, of course, benefit Crystal Geyser, who, should they pass the EIR, should in that event pay for the power upgrades they require. It is my personal hope that justice, clarity, and human rights will prevail, and I will continue to work toward that goal for my community, myself, for my child, and for any children she may have - she will always have fond, fond memories of this beautiful place, even if we find we have to relocate and take our business and our community efforts elsewhere. We are poised to do that if necessary, though it will break our hearts. In the meantime we will fight to protect that which we love.

With respect,
Dori Mondon - mother, business owner, and resident of Mount Shasta, CA

C33-1

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Response to Comment Letter C33

**Dori Mondon
December 23, 2016**

- C33-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C34

From: [Betsy Phair](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov; cgm@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 2:27:06 PM

To whom it may concern,

Please be advised that I am totally against the new substation proposed for the Crystal Geyser Plant in Mt. Shasta. The water bottling industry has relied more and more on robotics, which require more power for production. Why would this plant be any different from others throughout the industrialized world?

The county, in part, is counting on Crystal Geyser to bring more jobs. Really? If the county wants more jobs, refusing the new power plant would probably achieve that goal. If the power plant is approved there will only be a need for a few jobs: some one to oversee the robots, that's for sure, and some to drive forklifts and someone to oversee the computerized operation. That's very few employees!

Crystal Geyser is planning to close their plants in Calistoga and Bakersfield so blight will be created in those communities and is it a case of rape and pillage? They take the natural resources until they are gone and then leave?? Who cleans up the mess after they have created such blight in Mt Shasta? Will that attract more tourists?

Mt. Shasta's economy is built on tourism. It is important to keep the area pristine, as that is why people from many different areas come to Mt. Shasta in Siskiyou County. They want to see the beautiful, unobstructed vistas, which have brought tourists here for years, in the first place. They did not come to see industrialized buildings and power lines.

If Crystal Geyser is to put in a new substation, they need to pay for it, since they will be the sole beneficiary. We all hope new jobs and new businesses will come to Mt. Shasta, but that hasn't happened for years, and the chance that new businesses will come to Mt. Shasta is a pipe dream. No other businesses need the additional power other than Crystal Geyser!

The new power plant will emit more EMF's to the residents and businesses close to the facility. This can provoke multiple illnesses. Our bodies are electrical, and emf's mess with the native electrical conduction in our bodies.

A mitigated negative dec would be a travesty, and will probably be challenged in court. The Crystal Geyser Plant needs a full EIR for their *total* project. They cannot be allowed to do it piecemeal! That is against the law! Their EIR has to cover all aspects of their project in total, not sub sections, one at a time. This would include the need for a new substation to be included in the whole EIR. Shame on Crystal Geyser and their lobbyists for trying to circumvent the law!

I am not anti-growth. Growth needs to be done intentionally and with much regard to preserve this wonderful, natural environment where we have chosen to live.

Thank you for your attention to this matter.

Betsy Phair
300 Grove Street
McCloud, Ca. 96057

C34-1

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Response to Comment Letter C34

**Betsy Phair
December 23, 2016**

- C34-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C35

From: [David Moss](#)
To: [Lassen Substation Project](#); cc: Michael Rosauer; cc: Robert Haga; [pod@cpuc.ca.gov](#)
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 4:18:01 PM

Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005

To: LassenSubstation@dudek.com
cc: Michael Rosauer <michael.rosauer@cpuc.ca.gov>
cc: Robert Haga <robert.haga@cpuc.ca.gov>
cc: pod@cpuc.ca.gov

Dear Servants of the People,
Please see that the Lassen Substation use underground cable. Please no more overhead wires. It is for the Crystal Geyser Company. That should pay for it not local taxpayers.
These corporations should not be users of the taxpayer's money. They think only of profits, not people or the environment. Our natural land has a scenic beauty unparalleled on this planet. Please don't let them junk it up with industrial ugliness.
Thank you,
David Moss
POBox 567,
Mt Shasta, CA
96067
530-966-1862

C35-1

"I am not called to do great things, only little things with great love." M. Theresa

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C35

**David Moss
December 23, 2016**

- C35-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C36

From: [Jeannine Michaelson](#)
To: [Lassen Substation Project](#)
Cc: Michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration
Date: Friday, December 23, 2016 1:43:21 PM
Attachments: [Crystal Geyser Issue Dec. 2016.docx](#)

Notice of Intent to adopt a Mitigated Negative Declaration
PacifiCorp Lassen Substation Project
Application No A.15-11-005

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Re: Notice of Intent to adopt a Mitigated Negative Declaration
PacifiCorp Lassen Substation Project
Application No A.15-11-005

To Whom It May Concern,

My husband and I initially moved here in 2001, choosing to be in the serene beauty of this area rather than Sacramento where I drove twice a month to care for my elderly parents for the next three years. Recognizing this as the perfect place to write my second book, I returned in Jan. 2014 and am grateful to be back in a community with others who are making conscious choices related to a way of life that honors nature and all of life.

Since my return, I have been aware of the ongoing controversy regarding Crystal Geyser and the potential and dramatic impact their presence has on our community. As I observe all that has perpetuated throughout our country and world, as corporations continue to wield their power, destroying forests, the soil, our water and entire ecosystems, the pattern is prevalent. Continually overriding the will of the people who are invested, not in profit or greed, but rather sustainable living and an intelligence that surpasses short-term goals that line pocketbooks and further contribute to the destruction of our planet, this appears to be the microcosm of the macrocosm and all that is being revealed.

As a community, there are those of us who are coming together to say, "No more!" and are doing what we can to protect Mount Shasta, one of the last vestiges in this state and throughout the world, where people from all over the globe come to experience the tranquility, magnificence and pristine nature that abounds here. Serving as a model for a quality of life that is becoming extinct on this planet, it is profoundly important that we choose wisely to safeguard this amazing gift.

I am asking you to search your hearts, resisting the temptation to view this as yet another business opportunity and consider what is at stake for all who truly have a vested interest, in not only maintaining/sustaining the environment but improving and expanding our resources. This recent proposal to construct the tall transmission and distribution poles above ground would not only distort our views but greatly impact tourism and what is widely known as a sacred respite from the corporate/industrial world. Those who perceive this as "less than significant" appear to have their own motivation for supporting this venture and apparently with little or no substantiation for this viewpoint/position.

Given that the DEIR is still in progress, it appears premature to approve the Mitigated Negative Declaration (MND), increasing power to what I understand to be four times what Coco Cola required. It has not yet been decided that this will even be needed, unless you know something that we are not aware of. In any event, it is not ethical or equitable to expect our community to fund any potential upgrade that supports the increased power usage that benefits no one but Crystal Geyser.

Lastly, I acknowledge the role that you each play and request that you carefully consider your decision, weighing the bigger picture and well-being of, not only this community, but all

C36-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

communities throughout our land, large and small, recognizing the need to collaborate and take responsibility for caring for our environment, for one another, ensuring that our children and grandchildren have a future with greater freedom and abundance in all of the ways that truly matter.

Thank you.

Sincerely,

Jeannine Michaelson
Author/Writer

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C36-1
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C36

**Jeannine Michaelson
December 23, 2016**

- C36-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C37

From: cpreus@finestplanet.com
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 11:35:37 AM

I have been a resident of Mount Shasta since 1989. I second the sentiments expressed by Daniel Kealey:

I enjoy the views of the surrounding mountains. I am opposed to more utility poles being erected. Since it lost its timber industry, Mount Shasta has been a non-industrial town and most of the people like it that way. As a multinational corporation, Crystal Geyser thinks its priorities override community sentiment, and is resisting all efforts to be environmentally accountable. If we must have the bottling plant, then make sure they are not passing on costs to residents. They should pay for upgrades to the local power grid necessitated by their operation and they should honor the tourist industry need for scenic views. Additional utility wiring should be undergrounded.

C37-1

Sincerely,

Catherine Preus

Sent from Finest Planet WebMail.

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Response to Comment Letter C37

**Catherine Preus
December 23, 2016**

- C37-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C38

From: [Carolyn Real](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov; [Carolyn Real](#)
Subject: Notice of intent to adopt a mitigated negative declaration PacificCorp Lassen Substation Project Application No. A.15-11-005
Date: Friday, December 23, 2016 2:00:02 PM

I am writing to express my feelings about the above ground power line upgrade for Mt Shasta. First of all, I hope that they will be underground so as to help preserve the beauty of the town.

Second, i think that it's only fair that the Crystal Geyser corporation pay their fair share for what will benefit them the most.

I moved to Mt Shasta from L.A. ten years ago and I know how bad it can get. I am just one local resident of many who realize how precious this area is. For future generations I think it's imperative that we do the right thing now even if it costs more and make sure that main beneficiary foots most of the bill, not the taxpayers.

Thank you,
Carolyn Real
Mt Shasta

C38-1

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C38

**Carolyn Real
December 23, 2016**

C38-1 The commenter requests that the proposed replacement transmission line be placed underground. Please see General Response 2 (GEN2) regarding the undergrounding of transmission lines.

The comment regarding the Crystal Geyser bottling plant project does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C39

From: [John Sanguinetti](#)
To: [Lassen Substation Project](#)
Cc: pod@cpuc.ca.gov; [Michael Rosauer](#); [Robert Haga](#)
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 12:17:36 AM

From the Desk of John Sanguinetti
416 E Ivy
Mt Shasta, CA. 96067
530-926-6588

To Whom it May Concern. I am a retired Electrical Contractor (C10 336658 inactive). I have lived in Mt Shasta for the past 28 years and still own apartments in town.

I have been concerned about the way that this prospective Crystal Geyser (CG) project has been handled from the very beginning. I am not against this project
but I am against going ahead with it if we don't fully understand all the implications, effects and threats to our community and the beautiful area we have here. The county
is apparently cooperating with CG in trying to avoid actions that will require CEQA or any other type of community review.

In reading the PUC Notice of Intent document it is apparent that this Substation Upgrade is occurring because of the need for more capacity for the CG plant. If the
CG plant was not going in or being contemplated this project would not be necessary at this level of complexity and the GIANT new poles would not be proposed.

This proposed project will require a substantial increase in above ground infrastructure in an important view shed area practically in the middle of Mt Shasta City
and immediately adjacent to I-5 in one of its most scenic spots along the whole intermountain corridor between the Central Valley and the Oregon border.

Electrical cables of the size necessary and equipment for proper support and spacing on these poles will be quite prominent and visible from the freeway in the very
scenic area between Majestic Mt Shasta (14,179') to the east and the very scenic bulk of Mt Eddy (9,026') to the west and the striking unique cone of Black Butte (6334')
directly ahead about 1 mile away. Having all this industrial hardware and cable hanging on giant poles would not be a pleasant sight. Also, overhead HV lines are

required to have all brush and trees cleared beneath and adjacent to them, this will result in ugly bare strips in our forest cover from 50' to 100' wide. An additional
concern here is that Mercy Hospital is within 100 yards to the east of the freeway and immediately to the east of the proposed project with giant poles. This

hospital frequently (several times a week, sometimes at night) receives emergency medical cases via helicopter and sometimes fog or low clouds makes visibility a problem, creating an unnecessary risk for these flyers and the patients they serve. I believe that the best solution to these issues is to require undergrounding of the entire system

through this view shed area. Thank You for hearing my concerns about this issue. If I can be of any service please call.

C39-1

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C39

**John Sanguinetti
December 23, 2016**

C39-1 The commenter's concerns regarding the proposed upgrades and the perceived effect on visual resources and risk posed to Mercy Hospital (Mercy Medical Center Mount Shasta (Mercy Medical Center)) are noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. Components of the proposed project, including upgrading the transmission line and installing replacement poles, are evaluated in the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for potential impacts to aesthetic resources, including scenic vistas, scenic resources within a state scenic highway, existing visual character or quality of the site and its surroundings, and day- and nighttime views due to the introduction of new sources of substantial light or glare (see Section 5.1, Aesthetics, of the IS/MND).

The commenter raises concerns regarding the need to keep transmission rights-of-way (ROWs) clear of brush and trees, as required by General Order 95 (GO 95). The proposed poles would replace existing poles in an existing ROW, which is already maintained and cleared as required by GO 95. As such, the proposed project would not result in the need to clear additional forest or otherwise remove trees, brush, or scrub beyond what is already required for the existing facilities. Therefore, no additional impacts would result from the replacement of existing poles with newer poles.

The commenter raises concerns regarding the risk that the proposed pole replacement may pose to helicopters approaching Mercy Medical Center, which is east of Interstate 5. California Department of Transportation dataplates for the Mercy Medical Center of Mount Shasta Heliport indicate that permitted approach paths for the heliport are on heading of 150° and 350° (Caltrans 2017). Because the replacement poles would be located 0.48 to 0.94 miles from the helipad on nominal approach heading of between 2° and 50°, the proposed replacement poles would be well outside the approach headings permitted for the helipad and would therefore represent minimal risk to approaching helicopters.

The comment does not raise further specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C40

From: [Touson S.](#)
To: [Lassen Substation Project](#)
Cc: robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: lassen substation
Date: Friday, December 23, 2016 5:10:18 PM

To Whom it may concern,

Regarding the upgrade to PacifiCorp Lassen Substation Project in Mount Shasta, I have only two concerns.

1) One of the big reasons this upgrade is happening is because Crystal Geyser needs significantly more power for their operations, therefore they should pay proportionately for the upgrade and not have the full cost be imposed on the local ratepayers.

2) The views and nature of this area are unique to our rural community and I feel they should be preserved as much as possible. Please put new lines underground.

Sincerely,

Touson Saryon
Mt. Shasta, CA 96067

C40-1

C40-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C40

**Touson Saryon
December 23, 2016**

- C40-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.
- C40-2** Please see General Response 2 (GEN2) regarding the undergrounding of transmission lines.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C41

From: [Bruce Shoemaker](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 1:59:53 PM

Dear CPUC,

I am a resident and landowner in the City of Weed, California and a frequent visitor to the Mt. Shasta area. I am writing to object to the proposed Mitigated Negative Declaration for the Lassen Substation in the Mt. Shasta area. I believe that the current plan will result in significant harm to the aesthetic values of our area and that all of the line should be buried underground throughout this special region.

I also object to the corporate subsidy implied in not making Crystal Geyser pay for their fair share of the upgrade.

I request that any public hearing regarding this matter be held in the Mt. Shasta area, not in Sacramento or the Bay Area far from where the impacted communities are located.

Thank you for your consideration of this matter.

Bruce Shoemaker
800 Black Butte Road
Weed, CA 96094

C41-1

C41-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C41

**Bruce Shoemaker
December 23, 2016**

- C41-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.
- C42-2** Requests for hearings lies outside the purview of the California Environmental Quality Act process. The occurrence, location, and timing of any such hearing would be at the discretion of the Administrative Law Judge and Commissioner assigned to the proceeding.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C42

From: [Brian Stewart](#)
To: [Lassen Substation Project](#)
Cc: ["Michael Rosauer"; "Robert Haga"; pod@cpuc.ca.gov](#)
Subject: Notice of Intent to adopt a Mitigated Negative Declaration (MND) PacifiCorp Lassen Substation Project
Application No A.15-11-005
Date: Friday, December 23, 2016 1:04:17 PM

Dear Sir or Madam,

Please consider this email my request that the California PUC conduct its hearing regarding the adoption / consideration of the Mitigated Negative Declaration for the Lassen Substation Project in the area of Mount Shasta.

C42-1

The primary beneficiary / heaviest electrical load customer for this intended is projected to be Crystal Geysers' bottling plant. This beneficiary, the Crystal Geyser project, is currently undergoing its own CEQA – EIR process which will better determine impacts brought about by its proposed operations. Even though the Substation project is "off-site" of the bottling plants location, there is clearly a physical relationship between the two proposed projects and approval of the MND could, by way of this relationship, cause an illegal phasing of the bottling plant project. One can only assume, if adopted, that the electric loads, source of new power for those loads, green house gas accounting and the distribution system upgrades to benefit the bottler will signal that substation construction activity, for the benefit of this bottler, is acceptable...all prior to exhausting the bottling plant project's own EIR process. The two are clearly related and should not be phased or sub-divided away from what is meant to be a broader, more inclusive CEQA process (for the proposed bottling plant operation). To do so would undermine the intension of CEQA guidelines.

Please also be advise that the proposed electric distribution upgrades will affect our local Volcanic Scenic By Way view shed. By way of designation, a Scenic By-Way is entitled to special consideration in order to best preserve and protect the captivating views enjoyed by locals and tourist from all over the world.

C42-2

I have personally spent a great deal of time over recent years as a volunteer, working within a Committee to establish a specific Area Plan for the McCloud / southern Mount Shasta area. Preservation of View Shed considerations had robust local public support while working on the McCloud Area Plan. I am also occupied as a licensed General Engineering Contractor in California. I have reviewed enough information on these projects to see that they are clearly related and should be reviewed in the more inclusive terms found within a full EIR process. One could argue that the power demand for the bottling operation is so great that these substation and distribution improvements are practically a "dedicated" project to satisfy the Crystal Geyser facility.

Again, please consider a special hearing on this issue and postpone adoption of a MND.

Thank you and please incorporate this email into the public record for Application No A.15-11-005.

Brian P. Stewart
P.O. Box 291
McCloud, CA 96057-0291

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C42

**Brian P. Stewart
December 23, 2016**

- C42-1** The commenter requests that a public hearing be held on the proposed project. Requests for hearings lies outside the purview of the California Environmental Quality Act process. The occurrence, location, and timing of any such hearing would be at the discretion of the Administrative Law Judge and Commissioner assigned to the proceeding.
- C42-2** The commenter raises concerns regarding the link between the proposed project and the Crystal Geyser bottling plant project (Crystal Geyser project). The proposed project has utility independent of the Crystal Geyser project, and permitting of the Crystal Geyser project is not required for the function of the proposed project. It is, therefore, the view of the California Public Utilities Commission (CPUC) that the proposed substation is independent of the Crystal Geyser project. Please see General Response 1 (GEN1) for a more detailed discussion.

The commenter highlights the Volcanic Scenic Byway. The Draft Initial Study/Mitigated Negative Declaration (IS/MND) recognizes that the Volcanic Scenic Byway requires dedicated analysis with respect to the viewshed. Section 5.1, Aesthetics, of the IS/MND analyses the impacts of the proposed project on views from the scenic highway. Please refer to Sections 5.1.4(a), 5.1.4(b), and 5.1.4(c), which present an analysis of proposed project components on existing views from the Volcanic Scenic Byway.

The commenter's views on the proposed project are noted and will be included in the administrative record and considered by the CPUC during project deliberation. The commenter does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C43

From: [Ray Strack](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov; cqm@cpuc.ca.gov
Subject: Re: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 4:57:26 PM

Dear CPUC staff, Judge Haga and Commissioner Liz Podolinsky,

With regards to the proposed upgrades to the PacifiCorp Lassen Substation Project in Mount Shasta; as a resident of the area I am NOT in favor of the proposal. We need to maintain the integrity of our pristine natural regional beauty. On a far more macro note, the privatization of water for profit has been shown time and again to be an insidious and antithetical occurrence vis a vis how we have looked at water and other common goods as a society and community and as humans these past few eons. I pray you will see that this proposal is not in our communities interests. I am not lucky enough to be from the Mount Shasta area, but I have fallen in love with it and plan on living my life here. Let this hope of a new generation truly taking our communities future seriously dissuade you from letting corporate and monied interests adversely affect us for generations to come.

C43-1

Thanks for your time
Raymond Strack

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Response to Comment Letter C43

**Raymond Strack
December 23, 2016**

- C43-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C44

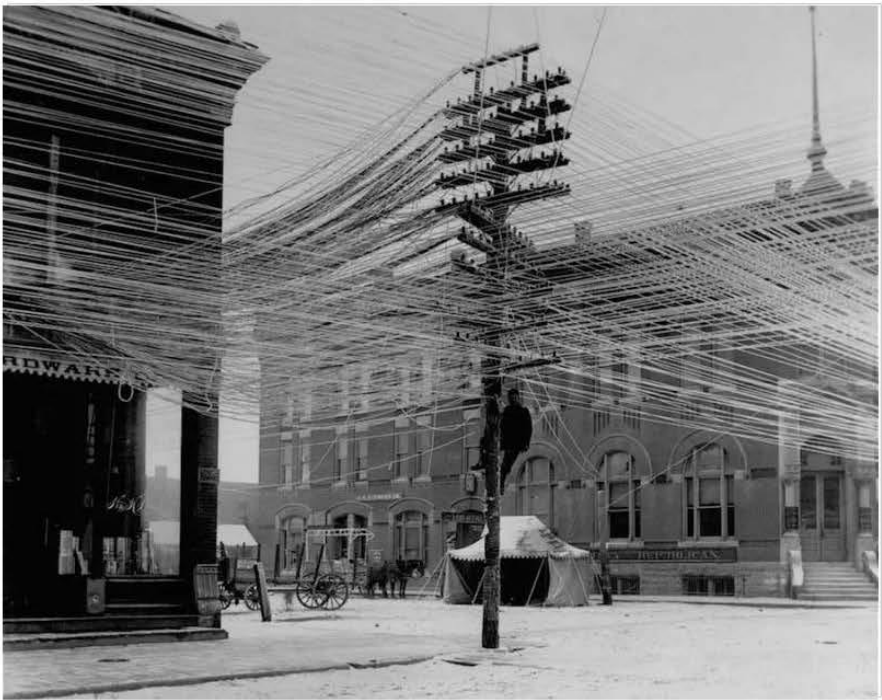
From: [Frank Toriello](#)
To: [Lassen Substation Project](#)
Cc: [michael.zosauer@cpuc.ca.gov](#); [Robert.haga@cpuc.ca.gov](#); [pof@cpuc.ca.gov](#); [cam@cpuc.ca.gov](#)
Subject: Notice of Intent to adopt a Mitigated Negative Declaration (MND) PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Friday, December 23, 2016 4:49:31 PM
Attachments: [unknown.tif](#)

Dear CPUC Staff,

The proposed upgrading of the PacifiCorp Lassen Substation is essentially an aspect of the Crystal Geyser Water Bottling Project in Mt. Shasta as stated on Page 311 of the IS/MND and should therefore be included in the EIR currently being developed for the Crystal Geyser project. CEQA guidelines preclude "piecemealing" of the scope of an EIR.

The Scenic Highways Element of the Siskiyou County General Plan for overhead utilities also stipulates "Underground utilities should be required wherever possible in all new development" (page 15 - V.I.B.8. - LOCATION OF OVERHEAD UTILITIES). The Scenic Highways Element of the General Plan also encourages the "enhance(ment of) areas of scenic value (page 11 - V.D.1. - Range of Visibility). Since this project is an upgrade of existing facilities and not merely a replacement of these utilities, it would obviously be new development and subject to the requirement for being placed underground.

Accepting the normalization of new, taller towers for these transmission lines is not a necessary position. The history of the PUC to allow regulated monopolies stems from the earlier practice of individual power companies having their own poles and lines which led to an unsightly and most likely dangerous situation.



My understanding of the history of the PUC was to allow companies exclusive districts for the purpose of resolving this state of affairs. I would hope we could expect to move forward as well in our current era.

Thank you for your consideration.

Sincerely, Frank Toriello

C44-1

C44-2

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Response to Comment Letter C44

**Frank Toriello
December 23, 2016**

- C44-1** The commenter indicates that California Environmental Quality Act guidelines preclude piece-mealing of projects. It is the view of the California Public Utilities Commission, as presented in the Draft Initial Study/Mitigated Negative Declaration, that the proposed project has utility independent of the proposed Crystal Geyser bottling plant project. Independent analysis of the impacts of the substation, therefore, is not piece-mealing. Please see General Response 1 (GEN1) for further discussion regarding the whole of the action and piece-mealing of the project.
- C44-2** The commenter states that the Siskiyou County General Plan requires overhead utilities to be placed underground wherever possible in all new developments. Please see General Response 4 (GEN4) for further discussion regarding application of City and County ordinances to the proposed project.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C45

From: Jack Trout
To: Lassen Substation Project; michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project
Date: Friday, December 23, 2016 4:47:05 AM
Attachments: [tour%20mt%20shasta%20logo%201\[1\].png](#)
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[Upper%20Sac%20Banner\[1\].jpg](#)
[McCloud%20Banner%20logo\[1\].jpg](#)
[McCloud%20Lecture%20Club%20Ad\[2\].jpg](#)
[McCloud%20Lecture%20Club%20Ad\[2\].jpg](#)
[logo%20banner%20i%205\[2\].jpg](#)
Importance: High

To Whom This May Concern,

My Name is Jack Trout, I am a guide, a historian of the area and a concerned citizen. I don't write these letters often but have found it absolutely imperative this time. I have lived in Siskiyou County for over 24 years and played sports in high school against local schools here since 1982. In 1994, I moved to Mt Shasta and I started Mt Shasta Scenic Tours and bought www.mtshasta.com I also own Jack Trout Guide Service as well as tourmtshasta.com & jacktrout.com. I rely on taking tourist around to share the areas, history, geography and scenic beauty. I am afraid this project and the power lines could be seen on my tours up Mount Shasta and from areas we view Shasta from the west looking east towards the town. They say Shasta is a Russian word for "Pure Snow." my goal would be to keep it that way. Since 1887 and the completion of the railroad to Ashland by BB Redding, countless million have visited the Shasta area via train up the Siskiyou Canyon from all over the world but mainly the San Francisco Bay Area. As then such is now, the Mount Shasta area serves as a refuge from the dichotomy of living in the cities and in a sense, acts as an Intel Pentium processor for folks who want to reboot their brains and continue back to the cities refreshed from their adventures in the Shasta area. Oh, I've seen it for years.

WE have to be the environmental example and absolutely have these corporations like Crystal Geyser be held accountable for doing what ever is necessary to keep the aesthetic beauty of our area, if this means burying power lines because it's in the best interest of our community, so be it. NO way in any capacity should any locals be left paying any part of these bills to have this done, we are a blue collar community and though I appreciate Crystal Geyser for providing jobs to locals, which is badly needed, they can afford indeed to bury their lines and not make our town any less desirable to the eyes, or make us whip out our check books to pay for their endeavors.

Oh, I could of sat down like some scholar and wrote a big letter with \$35 dollar words, the simple fact is, I have the largest tourism business in California and it is based here in Mount Shasta, do not allow Crystal Geyser to put in power lines unless they bury them, that should go without saying, it's 2016 we got to be getting better, not worse environmentally. I mean don't drive faster than your windshield, it makes sense.

I rely on my businesses of over 24 years serving local tourism and the local community as well as small businesses like me who rely on the town looking like the past, not the future. I am counting

C45-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

on all of you to make the right decisions on my behalf and my businesses who employs dozens in the region.

Thank you, Jack Trout
209 Pony Trail
Mount Shasta, Ca 96067
530-926-4540

↑ C45-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C45

**Jack Trout
December 23, 2016**

- C45-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C46

From: Jack Trout
To: Lassen Substation Project; michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: History Of The McCloud River Rainbow
Date: Friday, December 23, 2016 7:53:44 AM
Attachments: tour%20mt%20shasta%20logo%20[1].png
Mt%20Shasta%20Tour%20Group[1].jpg
Icid_10EE4098FA824E059EE478FC49828813@UsuarioPC[1].jpg
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McCloud%20Banner%20logo[1].jpg
McCloud%20Lecture%20Club%20Ad[2].jpg
McCloud%20Lecture%20Club%20Ad2[2].jpg
logo%20banner%20[1%205[2].jpg

<http://www.mtshasta.com/history-of-the-mccloud-river-rainbow/> Thanks for everything and thought you folks would enjoy this story I wrote on the History of our area. All I ask is to take into account every leading up to now and divided into the needs of all the people. There's a history side that must be considered and the thought in mind that towns like Mount Shasta are like the old Ma & Pa stores, these are the qualities that enhance our area and are becoming less known in the great state of California, the lack of chain anything, is what we value as well as the thousands of tourist annually in these parts, including the wide open views of things that haven't changed for an eternity.

C46-1

Happy Holidays!

Many Rivers to You, Jack Trout
Mount Shasta

From: Jack Trout
Sent: Friday, December 23, 2016 4:46 AM
To: LassenSubstation@dudek.com ; michael.rosauer@cpuc.ca.gov ; robert.haga@cpuc.ca.gov ; pod@cpuc.ca.gov
Subject: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project

To Whom This May Concern,

My Name is Jack Trout, I am a guide, a historian of the area and a concerned citizen. I don't write these letters often but have found it absolutely imperative this time. I have lived in Siskiyou County for over 24 years and played sports in high school against local schools here since 1982. In 1994, I moved to Mt Shasta and I started Mt Shasta Scenic Tours and bought www.mtshasta.com I also own Jack Trout Guide Service as well as tourmtshasta.com & jacktrout.com. I rely on taking tourist around to share the areas, history, geography and scenic beauty. I am afraid this project and the power lines could be seen on my tours up Mount Shasta and from areas we view Shasta from the west looking east towards the town. They say Shasta is a Russian word for "Pure Snow." my goal would be to keep it that way. Since 1887 and the completion of the railroad to Ashland by BB Redding, countless million have visited the Shasta area via train up the Siskiyou Canyon from all over the world but mainly the San Francisco Bay Area. As then such is now, the Mount Shasta area serves as a refuge from the dichotomy of living in the cities and in a sense, acts as an Intel Pentium processor for folks who want to reboot their brains and continue back to the cities refreshed from their adventures in the Shasta area. Oh, I've seen it for years.

See
C45-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

WE have to be the environmental example and absolutely have these corporations like Crystal Geyser be held accountable for doing what ever is necessary to keep the aesthetic beauty of our area, if this means burying power lines because it's in the best interest of our community, so be it. NO way in any capacity should any locals be left paying any part of these bills to have this done, we are a blue collar community and though I appreciate Crystal Geyser for providing jobs to locals, which is badly needed, they can afford indeed to bury their lines and not make our town any less desirable to the eyes, or make us whip out our check books to pay for their endeavors.

Oh, I could of sat down like some scholar and wrote a big letter with \$35 dollar words, the simple fact is, I have the largest tourism business in California and it is based here in Mount Shasta, do not allow Crystal Geyser to put in power lines unless they bury them, that should go without saying, it's 2016 we got to be getting better, not worse environmentally. I mean don't drive faster than your windshield, it makes sense.

I rely on my businesses of over 24 years serving local tourism and the local community as well as small businesses like me who rely on the town looking like the past, not the future. I am counting on all of you to make the right decisions on my behalf and my businesses who employs dozens in the region.

Thank you, Jack Trout
209 Pony Trail
Mount Shasta, Ca 96067
530-926-4540



See
C45-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C46

**Jack Trout
December 23, 2016**

- C46-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C47

From: lookingup@finestplanet.com
To: [Lassen Substation Project](#)
Cc: [Michael Rosauer](#); [Robert Haga](#); pod@cpuc.ca.gov
Subject: Comments: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project
Application No A.15-11-005
Date: Friday, December 23, 2016 3:27:24 PM

CORRECTED COPY.

Greetings

Crystal Geyser Water Company (CGWC) should and must pay an estimated large portion of the cost for the UPGRADE of electrical service that they request. The citizens of this city and area are NOT responsible for CGWC's cost of doing business. We see enough evidence in this country where some corporations attempt to take advantage of the public with shenanigans so that their already very profitable bottom lines can show more profit. Personally, I call that GREED and I also think that is what CGWC is attempting to do.

In addition CGWC makes enough profit so that they could easily KEEP their facility in our area aesthetically pleasing: a community without marring the landscape with electrical poles and wires.

Other areas that are less pristine have succeeded in getting underground utilities (less maintenance cost for Pacific Corp). The thought of unsightly power poles and wires are very disconcerting for those in this area, realizing that we, as a community, depend heavily on tourism. Tourists from all over the world are drawn by the beauty of this mountain town.

The fact is that the draft EIR has not been approved. Neither has the Mitigated Negative Declaration. This is not a game. It is a serious situation. Where is the logic here? Starting a project that is not yet approved? What sense is that? Wouldn't that make Pacific Power liable for any expense that was made illegally?

We, as citizens of Mount Shasta, call for a hearing and that hearing should be in Mount Shasta where we can attend and show our support and ask questions.

Sincerely,

Cecil Wilkerson
514 Lennon Street
Mount Shasta, Ca 96067
(530) 926-5634

Sent from Finest Planet WebMail.

C47-1

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Response to Comment Letter C47

**Cecil Wilkerson
December 23, 2016**

- C47-1** The commenter raises concerns regarding the aesthetics of the proposed project, and states that the transmission lines should be underground. Please see General Response 3 (GEN3) regarding the assessment of aesthetics for the proposed project and General Response 2 (GEN2) regarding undergrounding the transmission lines for the proposed project. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

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Comment Letter C48

From: [Monte Bloomer](#)
To: [Lassen Substation Project](#)
Cc: michael.rosauer@cpuc.ca.gov; robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005
Date: Monday, December 26, 2016 9:03:42 PM

I live, and have lived, along the Volcanic Legacy Scenic Byway for the past 37 years, in and around the City of Mount Shasta. The Lassen Substation project has many issues I have trouble with. Mainly, I think that most, if not all, of the transmission lines should be placed underground. Furthermore, the improvements to the substation and transmission lines that are in support of the Crystal Geyer Water Company, should not be the burden of the rate payers; Crystal Geyer should bare all of these costs, including underground transmission lines.

The Mount Shasta area is a very pristine area where people travel far and wide for respite from life in urban areas. Therefore, I believe, it needs a very close review for any changes that can effect it's beauty.

Approving the Mitigated Negative Declaration at this time is premature. I believe a hearing should be held in the Mount Shasta area so local folks can hear first hand and offer input.

Sincerely,
Monte Bloomer
Monte Bloomer
6905 Linville Dr.
Weed, CA

12/23/2016

C48-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C48

**Monte Bloomer
December 26, 2016**

- C48-1** The commenter does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. However, concerns are raised regarding the aesthetics of the proposed project, and the commenter states that the transmission lines need to be underground. Please see General Response 3 (GEN3) regarding the aesthetic impact of the proposed project and General Response 2 (GEN2) regarding the undergrounding of transmission lines. The commenter's opposition to the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C49

From: [Suzanne Frost](#)
To: [Lassen Substation Project](#)
Subject: Fwd: Notice of Intent to adopt a mitigated Negative Declaration for PacificCorp Lassen Substation Project (Application no. 15-101-005)
Date: Monday, December 26, 2016 4:42:57 PM

Hi. I emailed you this letter last Friday. I received an error message back, so I am resubmitting it. Please accept my letter. Thank you

----- Forwarded message -----

From: "Suzanne Frost" <suznnfrost@gmail.com>
Date: Dec 23, 2016 4:55 PM
Subject: Notice of Intent to adopt a mitigated Negative Declaration for PacificCorp Lassen Substation Project (Application no. 15-101-005)
To: <LassenSubstatio@dudek.com>, <michael.rosauer@cpuc.ca.gov>, <robert.haga@cpuc.ca.gov>, <pod@cpuc.ca.gov>
Cc:

To whom it May Concern:

I have been a resident of Mt. Shasta, California for sixteen years. I moved here from Boston, Massachusetts. I moved here because of the pristine environment. I love the clean air, clean land, and clean water of Mt. Shasta. I also totally enjoy the natural beauty of this charming g town.

I have major concerns regarding this project as follows:

1. From what I have read, this project is necessary, because of Crystal Geyser 's corporate desires. The EIR for Crystal Geyser hasn't been completed yet. Shouldn't this project be considered only if the Crystal Geyser project is approved? It may not be approved. If this project is approved, The EIR may force Crystal Geyser to change some of their corporate plans in the Mt.Shasta area.
2. It is important that Crystal Geyser be required to pay their share of the upgrade. This upgrade is clearly precipitated by Crystal Geyser's stated need for four times the power that was previously required by the Coca Cola plant. These costs should not be passed along to the area's rate payers. This multinational corporation should pay for their fair share of the upgrades. They can afford it.
3. I am also concerned about the construction of large scale utility poles. These poles will detract from the environmental beauty of the landscape. Also I worry about health risks caused by utility poles. Large scale utility poles will also negatively impact tourism in this area. Mt. Shasta is very dependent upon tourism. Please place all of these utility wires underground. Thank you.

Please protect the environment of the Mount Shasta area. Mt. Shasta is a special place. Thousands of tourists visit here every year because of it's beauty. Also the reason most of the residents live here is because of the environmental purity and beauty. Again, please protect the beauty the the environment of Mt.Shasta and the surrounding areas.

Thanks for all of the good you do.

Sincerely,
Suzanne Frost

C49-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C49

**Suzanne Frost
December 26, 2016**

C49-1 The commenter's concerns about the proposed project are noted and will be included in the administrative record and considered by the California Public Utilities Commission (CPUC) during project deliberation.

The commenter raises concern about the connection between the proposed project and the Crystal Geyser bottling plant project (Crystal Geyser project). As discussed in the Draft Initial Study/Mitigated Negative Declaration (IS/MND) and General Response 1 (GEN 1), the CPUC has determined that the proposed project has independent utility from the Crystal Geyser project. Further, the successful permitting of the Crystal Geyser project is not a pre-requisite for the construction and operation of the substation. Please see GEN1 regarding the independent utility of the proposed project.

The commenter raises concerns about the distribution of costs between the Crystal Geyser Water Company and other ratepayers. Any discussion regarding cost is outside the scope of California Environmental Quality Act; therefore, cost is not addressed.

The commenter expresses concern regarding the aesthetics of new poles and the potential for undergrounding the proposed lines. The CPUC has determined that the new poles would not significantly impact sensitive vistas and viewsheds. Please see General Response 2 (GEN2) regarding undergrounding of transmission lines. In addition, the components of the proposed project, including upgrading the transmission line and installing replacement poles, are evaluated in Section 5.1, Aesthetics, of the IS/MND for potential impacts to aesthetic resources, including scenic vistas, scenic resources within a state scenic highway, existing visual character or quality of the site and its surroundings, and day- and nighttime views due to the introduction of new sources of substantial light or glare.

The commenter does not raise specific issues related to the adequacy of the environmental analysis in the IS/MND; therefore, no additional response is provided or required.

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PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C50

From: [Dorian Aiello](#)
To: [Lassen Substation Project](#)
Subject: Support of project
Date: Tuesday, December 27, 2016 11:13:21 AM

To whom it may concern:

I would like to voice my complete support on this much needed project. As a native son and business owner, the need for reliable electrical service is paramount in our community. This much needed upgrade is well planned and needs to be implemented as soon as possible.

You have too much other important business in the State to tend to so my comments will be pithy.....Please stamp this project as approved as soon as possible. Our community needs it. Very benign project.....Thank you.

C50-1

Dorian M. Aiello, CPA

**Aiello, Goodrich & Teuscher
An Accountancy Corporation**

P.O. Box 158

Mount Shasta, CA 96067

Phone (530) 926-3881

Fax (530) 926-6296

dorian@agtcpa.com

www.agtcpa.com

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Response to Comment Letter C50

**Dorian M. Aiello
December 27, 2016**

- C50-1** The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required. The commenter's support for the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation.

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PacifiCorp Lassen Substation Project**

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C51

From: [Jim Cody](#)
To: [Lassen Substation Project](#)
Cc: robert.haga@cpuc.ca.gov
Subject: RE: Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application
No A.15-11-005
Date: Friday, December 23, 2016 2:55:43 PM
Attachments: [PastedGraphic-7.tiff](#)

as a resident of 35+ years, i respectfully request that our natural resources be given the highest
protections available. it is all we have.

Jim Cody



| C51-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C51

**Jim Cody
December 23, 2016**

- C51-1** The commenter's concerns regarding the proposed project are noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Comment Letter C52

Transcript of written comments received at the open meeting Mt Shasta, Wednesday December 7
2016

From : Francis Mangels

Mt Shasta Ca, 96067

The ratepayer should not finance CG (Crystal Geyser) or its alliances

The ratepayer should not finance CG (Crystal Geyser) or its alliances, any construction, pipelines
or conduits

Will Chemicals released into the aquifer by CG affect the line? later?

Will there be a public hearing by an outside judge ? ALJ

Who and what money determined that only aesthetics was significant? On what grounds? Why?
How? Prove it?

This is really for Otsuka Crystal Geyser! ALJ, take note of something going on under the table.

The buried lines will re-direct aquifer and surface flow this will affect existing utilities and
aesthetics.

Who said there was a need? My power use, with others has been going down significantly.
Conservation works.

A new substation is nice, but the set up the set-up for Otsuka CG is the real item, so this
substation should be part of an EIR.

The Proposed poles along W A Bass Road, Ream, and Cold? Route (sp.) to the golf course and
the detriment to tourist visual enjoyment. Put the wires underground, all the way. PS, not to
mention wire noise and hazard. Tree removal is not pretty either, plus dry out from redirecting
aquifer flow

C52-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Response to Comment Letter C52

**Francis Mangels
December 7, 2016**

C52-1 The commenter states that the ratepayer should not pay for the Crystal Geyser bottling plant project (Crystal Geyser project) or “alliance” projects. The Crystal Geyser project is currently under review by Siskiyou County and is outside the purview of the California Public Utilities Commission (CPUC). The equitable distribution of payment for the proposed project between Crystal Geyser Water Company and other ratepayers is outside the scope of environmental review.

The commenter asks whether chemicals released by the Crystal Geyser bottling plant into the aquifer would affect the proposed project. The Draft EIR for the Crystal Geyser project does not identify any chemicals or mechanism by which legal operation of the bottling plant would affect underground transmission lines (County of Siskiyou 2017).

The need for a public hearing is outside the purview of the environmental review. The need for additional public hearings will be determined by the Administrative Law Judge.

The commenter states that impacts to aesthetics were determined to be significant. The impact of the proposed project on the aesthetic resources is discussed in Section 5.1 of the Draft Initial Study/Mitigated Negative Declaration (IS/MND). The methods, thresholds, and standards used to analyze impacts of the proposed project on aesthetics are discussed in Section 5.1. The proposed project was determined to have no significant impact on aesthetics. Since the commenter raises no substantive issues with the methods or conclusion of the IS/MND, no further response is required or provided.

The commenter states that the buried lines would redirect aquifer and water flow and affect existing utilities and aesthetics. The commenter does not provide substantive reasoning or fact to support this opinion. It is, therefore, not possible to ascertain the validity of this statement. Since the commenter raises no substantive issues with the methods or conclusion of the IS/MND, no further response is required or provided.

The commenter asks who determined the need for the project. Determination of need was initially made by the utility and was subsequently verified by the CPUC. A detailed description of the objectives for the proposed project is presented in Section

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

4.2, Project Objectives. Since the commenter does not raise substantive issues with the project's objectives, no further response is required or provided.

The commenter states that the proposed substation should be part of the Crystal Geyser project. The CPUC has determined that the proposed project has independently utility from the Crystal Geyser project. Please refer to General Response 1 (GEN1) for a more detailed discussion about the relationship between the proposed project and the Crystal Geyser project.

The commenter states that the proposed upgrades to poles would be detrimental to visual resources for tourists. The impact of the proposed project on visual resources is discussed in Section 5.1, Aesthetics, of the IS/MND.

The comment regarding wire noise and hazard and tree removal is not clearly understandable in relationship to the proposed project. Since no substantive comment can be determined, no response is required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C53

DEC 12 2016

Michael Rosauer
RE: Lassen Substation Project
California Public Utilities Commission, c/o Dudek
605 Third Street
Encinitas, CA 92024

12/8/2016

Dear Sirs,

I attended the public meeting regarding the Mount Shasta substation on 12/7/2016. I had prepared some comments for you but because of the format and the demeanor of some of the attendees, I decided it would be more efficient to put my comments in writing for you and the record.

My name is Russ Porterfield. I have lived in Mount Shasta for almost 35 years and my family has been in Siskiyou County since 1929, about the time I understand this substation was originally installed. I am a former member of the Mount Shasta City Council (more than 4 terms) and was Mayor 4 times.

I am in support of this project for several reasons.

Safety and public welfare is probably the biggest one. Power in our area needs to be reliable and for the most part it has been. However, in the winter particularly, weather and other circumstances cause the power to go out more than it should. With the improvements to the Weed substation, the Mount Shasta substation becomes a major link in the ability to provide power when issues arise in areas other than our own. Having the ability to bring power from other parts of the grid at a level necessary is huge.

Second, its time. I understand this substation has equipment dating back to 1930 and hasn't had any real upgrades since. We need to take advantage of the new technology. Keeping our power grid up to speed is vital for our area and its population. Compatibility to the grid by having the ability to go to 115kV is a strong plus.

The site of the new substation is about as perfect a location as it can be as it is immediately adjacent to the current site. This would minimize any impact visually or aesthetically.

This project has been in the works since 2010. Many are trying to link it to the bottling plant issue. Since this has been in the works long before the bottling plant issue was even an issue, I'm having trouble seeing the nexus. I believe the substation should be handled as a separate project and not combined.

Our city and county have made it a priority to encourage economic development. The City of Mount Shasta has property that hopefully will be developed eventually. That development will

C53-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

need reliable power and this project would ensure that for the foreseeable future, this would be the case.

I appreciate the time you took to come to Mount Shasta for input. I also know there is an element in our community that does not want any kind of growth. Most of us, however would like a stable community with a good economy.

Sincerely,



Russ Porterfield

546 N Adams Drive, Mount Shasta, CA 96067

↑
C53-1
Cont.
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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C53

**Russ Porterfield
December 8, 2016**

- C53-1** The commenter's support of the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Comment Letter C54

JOHN E. KENNEDY, Sr.

709 Rockfellow Dr.
Mount Shasta, Ca 96067
530 859-1845
theden@snowcrest.net

December 11, 2016

Michael Rosauer
Re: Lassen Substation Project
California Public Utilities Commission, c/o Dudek
605 Third Street
Encinitas, CA 92024

My Name is John Kennedy and I was born and raised in Mount Shasta. I have raised my family and been in business here and am one of the lucky ones to have had one of my sons be able to live and make a living here. I have watched this town grow from being one of smallest towns in Southern Siskiyou County to being the largest and during this time we have lived with a power substation that was placed into service when my grandfather was doing business here over 90 years ago and it has now reached its capacity to serve the Mount Shasta area. If we were to add a couple new 100 room motels, or to develop 50 new homes or to add 20 new business buildings to this system or to develop The Landing, 127 acers of City owned property now trying to be developed, with maybe a 150 space RV Park, along with an amphitheater, the present system, more than likely, would not be able to handle the increased load.

I know that there will be some objection to the fact that 36 transmission poles will be replaced and will be raised to a height of 75 ft. as required for the new voltage the lines will be carrying. This will be an increase of about 15 ft. I have lived here for over 70 years and until a week ago I had never noticed the present poles. Most are in a mix of other telephone and power lines so I believe that most people will never notice the change in height of these poles. I found that from the freeway you cannot see most of the poles and the ones you can see tend to blend in with their surroundings.

As one of a coalition of Mount Shasta residents and business owners who wish to see our community continue to thrive. This new substation will improve our service, making for fewer power outages and brown outs. It will improve reliability and provide additional electrical capacity, allowing for more growth in the Mt. Shasta area. This substation will not only enhance our quality of life, but is essential to meet our community and economic development needs for the future.

C54-1

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

I strongly urge you the California Public Utilities Commission to see the need for upgrading this nearly 90 year old power Substation with the construction of the new Lassen substation.

This Substation reminds me of my friend that just purchased a 1929 Model A Ford. When it was new it was the state of the art machine moving people down the hi way at maybe 30 to 40 miles per hour and mostly trouble free, but as it got older into the 50's and 60's it was still chugging along, but becoming less and less reliable and the new automobiles were now doing 55 and 60 miles / hour. With many new conveyances. Larger cars, radios, smoother ride, larger engines, power steering, air conditioning and more reliable. By the 80's and 90's the model A was still running but it was considered a collectable car, an antique, parts were not always easy to get and had to be fabricate to keep it running. The new cars were now traveling 70 mph down the road and were considered much more reliable. Today that model A Ford has a hard time making it up the hill to McCloud without boiling over. The feeling is that it has long gone over its useful life and now is going to be up dated and turned into a state of the art hot rod that will again start a new life that will last for years.



C54-1
Cont.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

Response to Comment Letter C54

**John E. Kennedy Sr.
December 12, 2016**

- C54-1** The commenter's support of the proposed project is noted and will be included in the administrative record and considered by the California Public Utilities Commission during project deliberation. The comment does not raise specific issues related to the adequacy of the environmental analysis in the Draft Initial Study/Mitigated Negative Declaration; therefore, no additional response is provided or required.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

7.3 References

- 14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.
- California Public Resources Code, Sections 21000–21177. California Environmental Quality Act (CEQA), as amended.
- California Public Utilities Code, Division 1: Regulation of Public Utilities; Part 1: Public Utilities Act; Chapter 5: Certificates of Public Convenience and Necessity; Article 1: Specified Utilities; Section 1002.
- Caltrans (California Department of Transportation). 2017. “Mercy Medical Center of Mt. Shasta Heliport.” Accessed March 2017. http://dot.ca.gov/hq/planning/aeronaut/helipads/dataplates/pdfs/Mercy_Medical_Center_of_Mt_Shasta_HP.pdf.
- CAPCOA (California Air Pollution Control Officers Association). 2008. CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January 2008.
- CDFG (California Department of Fish and Game). 2009. Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities.
- County of Siskiyou. 2017. Draft Environmental Impact Report, Crystal Geyer Bottling Plant Project. January 2017. <https://www.co.siskiyou.ca.us/content/community-development-crystal-geyser-project>.
- PacifiCorp. 2016. “PacifiCorp Response to CPUC Data Request 2.0.” February 22, 2016.
- Power Engineers. 2015. Lassen Substation Project Biological Resources Habitat Assessment. September 2015. Prepared for PacifiCorp.

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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**Final Initial Study and Mitigated Negative Declaration for
PacifiCorp Lassen Substation Project**

TABLE OF CONTENTS

| <u>Section</u> | <u>Page No.</u> |
|---|------------------------|
| 7 INTRODUCTION TO RESPONSE TO COMMENTS..... | 1 |
| 7.1 Common Responses to Recurring Comments | 3 |
| 7.1.1 Summary of Issues Raised | 4 |
| 7.1.2 Common Responses..... | 4 |
| 7.2 Comment Letters Received/Response to Comments | 8 |
| A. Agencies..... | 9 |
| B. Organizations | 23 |
| C. Individuals..... | 103 |
| 7.3 References | 341 |

APPENDICES

No table of figures entries found.

FIGURES

No table of figures entries found.**TABLES**

| | |
|---|---|
| Table 7-1 Comment Letter Designations and Response Index | 2 |
| Table 7-2 Common Response Topics | 4 |
| Table 7-3 Consistency with Energy/Transmission-Specific County and City General Plan Policies..... | 7 |

Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project
