

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

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## **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

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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

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**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).

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## 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,<sup>1</sup> 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:

<sup>1</sup> *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.



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- Ensure that all equipment and structures comply with current company, state, and federal standards,<sup>2</sup> including the replacement of aging and non-standard equipment and the removal of sulfur hexafluoride (SF<sub>6</sub>) 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.

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<sup>2</sup> PacifiCorp 2016, DR 2.0 – Response 2.0a.

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## **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.

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**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.	<b>Not applicable</b> – 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.	<b>Consistent</b> – 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).	<b>Consistent</b> – 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).	<b>Consistent</b> – 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: <ol style="list-style-type: none"> <li>1. Provide for normal use of the land and protect against unsightly features.</li> <li>2. Locate transmission lines and towers outside of Scenic Corridors when feasible.</li> <li>3. Establish architectural and site design review by the appropriate local jurisdiction.</li> <li>4. Use landscaping to increase scenic qualities (Siskiyou County Planning Department 1974, Principle C: The Scenic Route Corridor).</li> </ol>	<b>Consistent</b> – The proposed project would not introduce new facilities into a scenic route corridor. Facilities already exist and are being upgraded.

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**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).	<b>Consistent</b> – 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.

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## 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](http://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*

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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

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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 report<sup>1</sup>) 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

<sup>1</sup> Peggy, Fiedler L. *Mitigation-related Transplantation, Relocation and Retention Projects Involving Endangered and Threatened, and Rare Plant Species in California*. 157 pgs., 1991. Print.



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## 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>



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## 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 <sup>2</sup>

*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

<sup>2</sup> Fish and Game Commission Wetlands Resources Policy (Amended 8/18/05)

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*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 impacts<sup>3</sup>. 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

<sup>3</sup> 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

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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](mailto:Amy.Henderson@wildlife.ca.gov).

Sincerely,



 Curt Babcock  
Habitat Conservation Program Manager

ec: Michael Rosauer  
[LassenSubstation@dudek.com](mailto:LassenSubstation@dudek.com)

State Clearinghouse  
[State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov)

Rachelle Pike, Kristin Hubbard and Amy Henderson  
California Department of Fish and Wildlife  
[Rachelle.Pike@wildlife.ca.gov](mailto:Rachelle.Pike@wildlife.ca.gov), [Kristin.Hubbard@wildlife.ca.gov](mailto:Kristin.Hubbard@wildlife.ca.gov); and  
[Amy.Henderson@wildlife.ca.gov](mailto:Amy.Henderson@wildlife.ca.gov)

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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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## **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

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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

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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**

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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

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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

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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

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## 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](#)

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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](mailto:flyraven@sbcglobal.net)

Begin forwarded message:

**From:** Raven <[flyraven@sbcglobal.net](mailto: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](mailto: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

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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  
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B1-2

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

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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**

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## **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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# 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](#)

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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

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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.

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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

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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

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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

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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

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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.4<sup>th</sup> 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.4<sup>th</sup> 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**

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## **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

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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

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*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

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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](mailto:LassenSubstation@dudek.com)  
cc: Michael Rosauer <[michael.rosauer@cpuc.ca.gov](mailto: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.

B3-1

B3-2

B3-3

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

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

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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

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

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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  
Cont.

# 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

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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

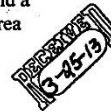
The Honorable Matthew Erskine  
Deputy Assistant Secretary for Economic Development  
U.S. Economic Development Administration  
1401 Constitution Avenue, N.W.  
Washington, D.C. 20230

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



B3-9  
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## Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

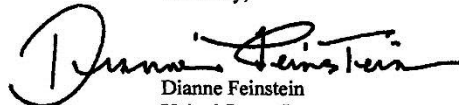
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jobs. This project would help to reverse the trend of job loss and prepare the area for future economic growth.

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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# **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

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**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

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- 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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## 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

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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**

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## **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

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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](#)

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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

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

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## 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

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Cont.

December 7, 2015

Mt. Shasta Tomorrow  
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Mt. Shasta CA 96067  
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# Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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#### 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

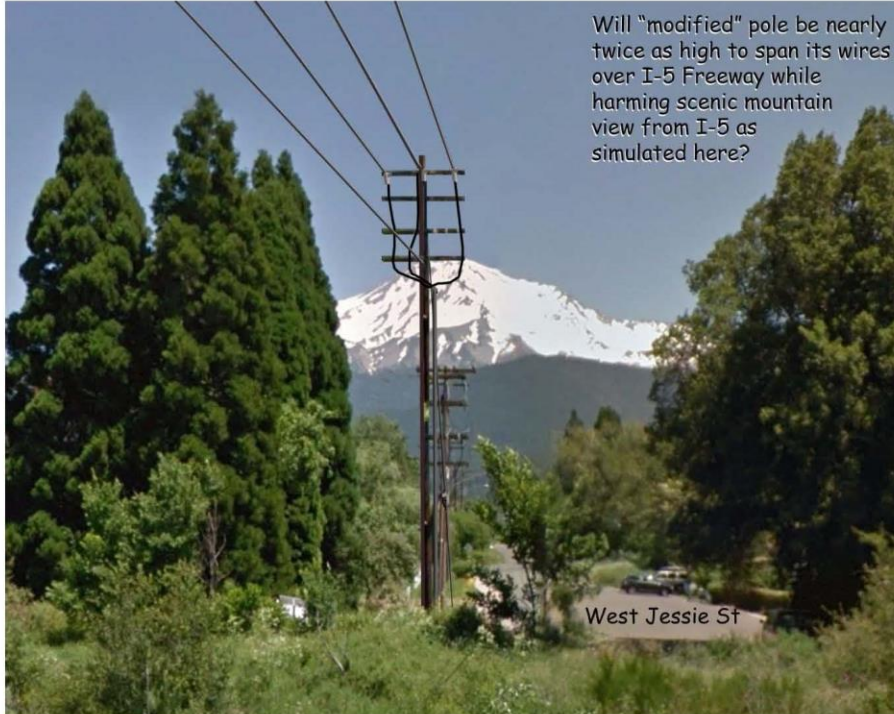
MT. SHASTA TOMORROW, a California non-profit public-benefit corporation whose members live in the Mt. Shasta area, states there are serious flaws in the Proponent's Environmental Assessment that PacifiCorp submitted for review. The PEA fails to acknowledge, identify and mitigate some of this Project's 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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Cont.

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

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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:



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Cont.

## 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

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## 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.'" <sup>1</sup>

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.

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<sup>1</sup> 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>

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

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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

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

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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.<sup>2</sup>

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 CO<sub>2</sub>e<sup>3</sup> 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 CO<sub>2</sub>e emissions and will therefore be less-than-significant. But the

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<sup>2</sup> 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."

<sup>3</sup> CO<sub>2</sub>e, 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 CO<sub>2</sub> that would create the same amount of warming.

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Cont.

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

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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.<sup>4</sup> 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 CO<sub>2</sub>e emissions. Under this standard, the PEA assumes if this PacifiCorp/Crystal Geyser Project emits more CO<sub>2</sub>e 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 CO<sub>2</sub>e. 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.

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<sup>4</sup> (See **Attachment 1** for some Crystal Geyser's email correspondence seeking such electric power upgrades).

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

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Nestle underestimated its long-range heavy trucking GHG emissions because it calculated CO<sub>2</sub>e 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 CO<sub>2</sub>e 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 CO<sub>2</sub>e 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 CO<sub>2</sub>e. 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:

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

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- 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

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

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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.

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

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## 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.*" <sup>5</sup>

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.

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<sup>5</sup> 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

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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.

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

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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

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

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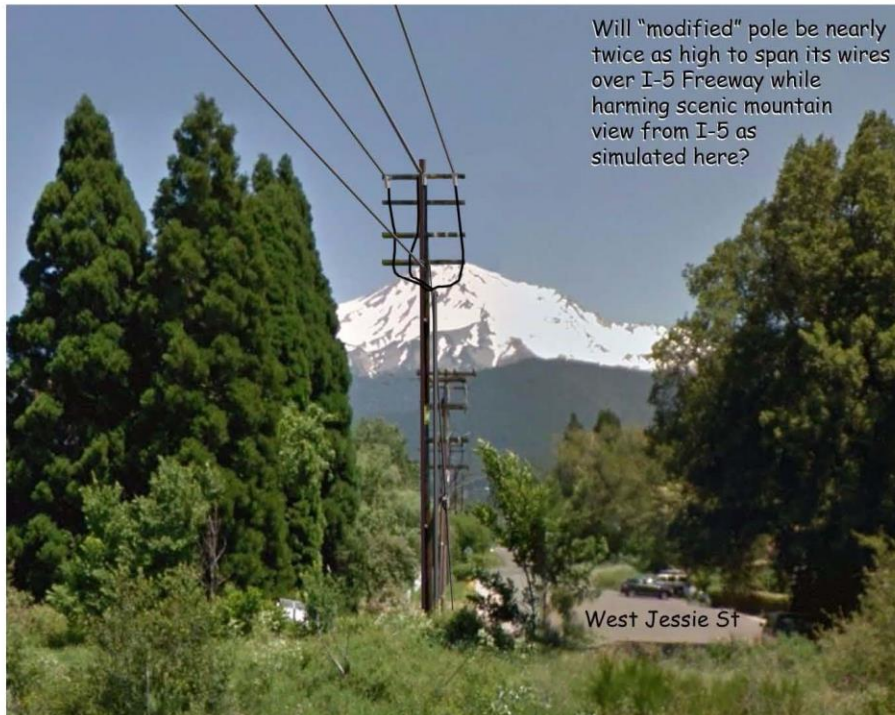
## Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project

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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:



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

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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 feet<sup>6</sup> 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

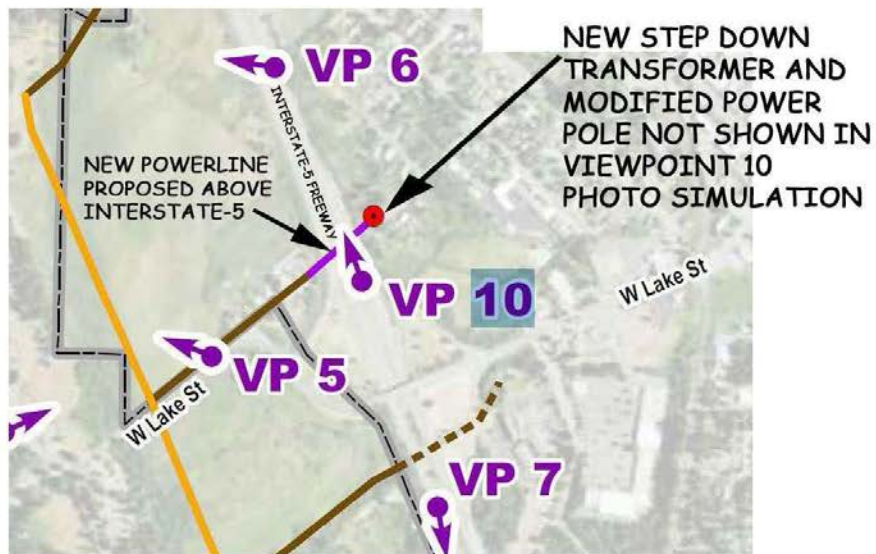
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<sup>6</sup> Distance estimated using Google Earth's measurement tool.

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## 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?:



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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:

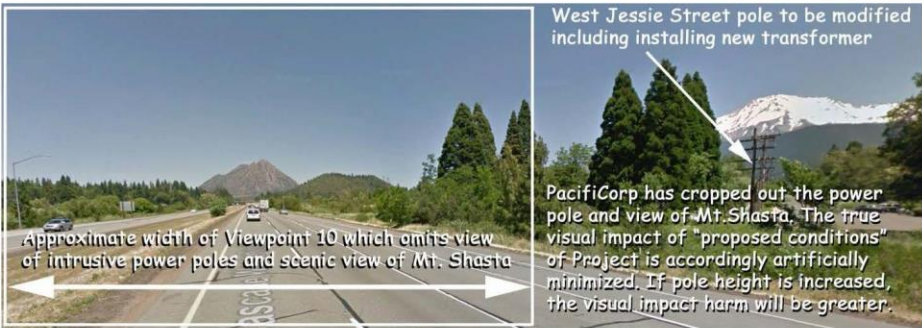


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Cont.

Here below on the easily visible right side of northbound I-5 Freeway motorists' views is what the PEA hides from the public:



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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

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Cont.

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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."<sup>7</sup>

"In addition to improving the visual landscape, underground construction improves reliability."<sup>8</sup>

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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 ...

No preview available for this page. [Buy this book.](#)



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.

<sup>7</sup> Electric Power Distribution Handbook, Second Edition, May, 2014, by Thomas Allen Short, p. 142.

<sup>8</sup> *(Ibid.)* p. 140.

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**b. The PEA Fails to Disclose if There Will 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.



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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.<sup>9</sup> 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.

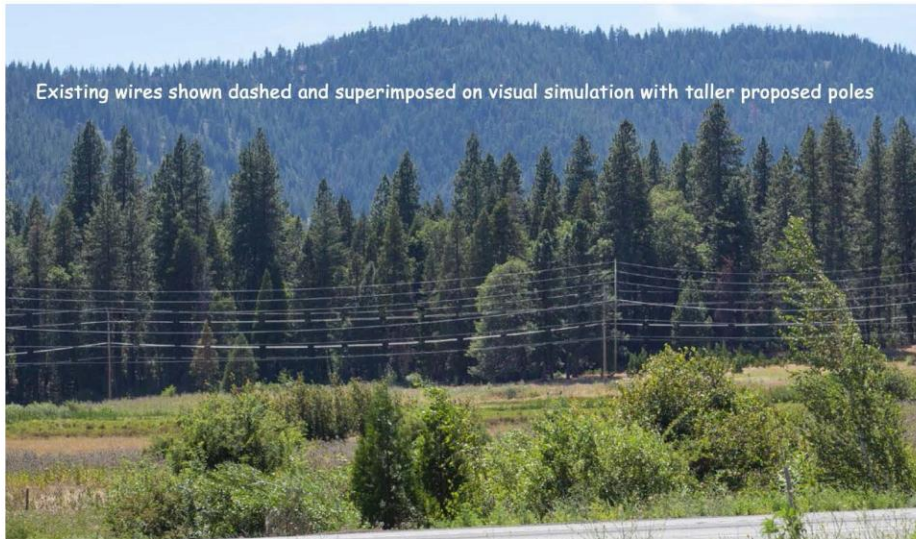
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<sup>9</sup> "An accurate, stable and finite project description is the *Sine qua non* of an informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71 CA3d, 185, 193. The primary harm caused by shifts among different 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)

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**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." <sup>10</sup>

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

<sup>10</sup> 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".

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Cont.

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

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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.

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Cont.

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- 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)

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Cont.

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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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- 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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## 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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## 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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## 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  $L_{eq}$ .<sup>11</sup> 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.

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<sup>11</sup> 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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### 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:

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*"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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## 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<sub>eq</sub> 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

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from a proposed power pole (#167241) that will be modified with increased voltage wires.<sup>12</sup> 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

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<sup>12</sup> See PEA, Fig. 3-5G for pole location. Distance estimated using Google Earth distance tool.

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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

B5-1  
Cont.

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

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## **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.

# **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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Comment Letter B6

**From:** [Richard Lucas](#)  
**To:** [Lassen Substation Project](#); [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov); [cgm@cpuc.ca.gov](mailto: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](#)

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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  
PacifiCorp 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

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President of the Board, Mount Shasta Bioregional Ecology Center  
PO Box 1143  
Mount Shasta, CA 96067 USA  
[richard@shastavisions.com](mailto:richard@shastavisions.com)  
[www.mountshastaecology.org](http://www.mountshastaecology.org)

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

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**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  
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*

Richard Lucas, President  
For the Board of Directors  
Mount Shasta Bioregional Ecology Center

B6-1

B6-2

B6-3

# **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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## **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.

**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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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](http://www.siskiyoucounty.org)

B7-1

## **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**

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## **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**

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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

**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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## **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.

**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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Comment Letter C2

**From:** [Ted Marconi](#)  
**To:** [Lassen Substation Project](#)  
**Subject:** Lassen Substation  
**Date:** Thursday, December 08, 2016 12:13:56 PM

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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 9606



This email has been checked for viruses by Avast antivirus software.  
[www.avast.com](http://www.avast.com)

## **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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## **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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# 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

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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**

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## **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

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## Comment Letter C4

**From:** [zavada@snowcrest.net](mailto:zavada@snowcrest.net)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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

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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**

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## **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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# 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](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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

## **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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## **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

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## Comment Letter C6

**From:** [Saranam Web Design](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto: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

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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 its 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**

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## **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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# 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](#)

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see attached

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

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## 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**

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## **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

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## Comment Letter C8

**From:** [Todd Cory](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [Michael Rosauer](#); [Robert Haga](#); [pod@cpuc.ca.gov](mailto: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

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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

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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

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C8-3  
Cont.  
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# **Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project**

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## **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.

**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 C9

From: jef@code  
To: dms.zachary@pacifi.com  
Cc: southcoast@pacifi.com; LassenSubstationProject@pacifi.com; robert.haga@cpuc.ca.gov  
Subject: Notice of Intent to adopt a Mitigated Negative Declaration for PacifiCorp Lassen Substation Project Application No. A.15-11-009  
Date: Thursday, December 22, 2016, 9:05:05 AM  
Attachments: CPUC PACIFIC CORP (RWS) 1-16.pdf  
CPUC PACIFIC CORP (RWS) 2-16.pdf  
CPUC PACIFIC CORP (RWS) 3-16.pdf  
CPUC PACIFIC CORP (RWS) 4-16.pdf  
CPUC PACIFIC CORP (RWS) 5-16.pdf  
CPUC PACIFIC CORP (RWS) 6-16.pdf  
CPUC PACIFIC CORP (RWS) 7-16.pdf  
CPUC PACIFIC CORP (RWS) 8-16.pdf  
CPUC PACIFIC CORP (RWS) 9-16.pdf  
CPUC PACIFIC CORP (RWS) 10-16.pdf  
CPUC PACIFIC CORP (RWS) 11-16.pdf  
CPUC PACIFIC CORP (RWS) 12-16.pdf

Notice of Intent to adopt a Mitigated Negative Declaration for PacifiCorp Lassen Substation Project Application No. A.15-11-009

To: mike.rosenauer@cpuc.ca.gov cc:  
LassenSubstation@dudek.com

cc: Robert Haga <robert.haga@cpuc.ca.gov> cc:  
pod@cpuc.ca.gov  
CC: oym@cpuc.ca.gov

Dear CPUC Staff, Environmental Consultants, Judge Haga and Commissioner Podolsky,

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

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**Alviar, Janet**

**From:** Dietrich, William  
**Sent:** Tuesday, April 30, 2013 11:35 AM  
**To:** Randolph, Edward F.; Walker, Cynthia; Sterkel, Merideth "Molly"; Strauss, Rol  
Borak, Mary Jo; Sher, Nicholas  
**Subject:** Mt. Shasta Bottling Plant interconnection -- FYI, compliments from stakehol

As you know, Energy Division staff (Mary Jo Borak and I) and our attorney, Nick Sher, have been assisting Sisk 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 With his permission I am forwarding it to you. (Monte refers to Monte Mendenhall, Regional Commission M. PacifiCorp. Pacific Power is part of PacifiCorp.)

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 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

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**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

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**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) [<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](mailto:andrew.barnsdale@cpuc.ca.gov)> wrot  
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)

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**From:** [hillmanbruce@gmail.com](mailto: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:** [Reiser, 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

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**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 15<sup>th</sup> 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 you have any questions.

Julie Meadows  
Executive Assistant  
1512 S. Oregon Street  
Yreka, CA 96097  
530.842.1638  
[www.facebook.com/SiskiyouEDC](http://www.facebook.com/SiskiyouEDC)



C9-1  
Cont.

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

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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 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

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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 11<sup>th</sup> 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**

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## **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

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## Comment Letter C10

**From:** [Bobby J Henson](#)  
**To:** [Lassen Substation Project](#); [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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**

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## **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

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## Comment Letter C11

**From:** [Marilyn Lemmon](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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

## **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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## **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

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Comment Letter C12

From: [dan rice](#)  
To: [Lassen Substation Project](#)  
Subject: Lassen Substation  
Date: Thursday, December 22, 2016 6:12:04 PM

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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 PacifiCorp's 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](mailto:danricems@yahoo.com)

C12-1

**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**

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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.

**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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## Comment Letter C13

**From:** [Mary Saint-Marie](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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 they 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

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Now is the Time.

In Beauty,

Mary Saint-Marie

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

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## **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.

# **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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Comment Letter C14

**From:** Marilyn Taylor  
**To:** Lassen Substation Project  
**Cc:** Michael Rosauer; Robert Hada; [pod@cpuc.ca.gov](mailto: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

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**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

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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.

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

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

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

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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

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Sincerely,  
Marsha Yates  
1208 Everett Memorial Highway  
Mt. Shasta, CA 96067  
530-925-5760

**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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## **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.

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

## 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

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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**

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## **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.

**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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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](#)

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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

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**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

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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

**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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## **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.

# **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 C18

**From:** [lber@snowcrest.net](mailto: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](mailto: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

# **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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## **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

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## Comment Letter C19

**From:** [Molly Brown](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [cc: Robert Haga](#); [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov); [cam@cpuc.ca.gov](mailto: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

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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 they 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

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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

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Molly Young Brown, M.A., M.Div

722 Meadow Ave Mt Shasta CA 96067  
530-926-0986 (phone & fax)  
[MollyYBrown@gmail.com](mailto:MollyYBrown@gmail.com)  
MollyYoungBrown.com

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

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## **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.

# **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 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](mailto:LassenSubstation@dudek.com)  
cc: Michael Rosauer <[michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov)>  
cc: Robert Haga <[robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov)>  
cc: [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov)  
cc: [cqm@cpuc.ca.gov](mailto: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](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

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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

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Respectfully Submitted,

Angelina Cook  
516 Shasta Ave.  
McCloud CA 96057  
(530) 859-2083

# **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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## **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 (SF<sub>6</sub>) distribution breakers, which would reduce any potential SF<sub>6</sub> 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 CO<sub>2</sub>E) 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 CO<sub>2</sub>E 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**

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- 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

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Comment Letter C21

**From:** [shanta@shantagabriel.com](mailto:shanta@shantagabriel.com)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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](mailto: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](mailto:lassensubstation@dudek.com)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov),  
[robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov), [pod@cpuc.ca.gov](mailto: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

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\*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 they 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

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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**

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## **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

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Comment Letter C22

**From:** [Beverly Jean Harlan](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [Michael Rosauer](#); [Robert Haga](#); [pod@cpuc.ca.gov](mailto: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

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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

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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**

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

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Comment Letter C23

**From:** [rhea.harlow](#)  
**To:** [Lassen Substation Project](#); [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov)  
**Subject:** Lassen Substation Concerns  
**Date:** Friday, December 23, 2016 1:17:25 PM

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**RE:**  
*Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen  
Substation Project  
Application No A.15-11-005*

**To:** [LassenSubstation@dudek.com](mailto:LassenSubstation@dudek.com)  
**cc:** Michael Rosauer <[michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov)>  
**cc:** Robert Haga <[robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov)>  
**cc:** [pod@cpuc.ca.gov](mailto: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

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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

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C23-1  
Cont.  
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# **Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project**

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

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## Comment Letter C24

**From:** [Tom Hesseklanz](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [Monte Mendenhall \(monte.mendenhall@pacifcorp.com\)](#); [Ted Palfini](#); [Joe Wirth](#); [Richard Lucas](#); [Jill Harris](#)  
**Subject:** Lassen Substation  
**Date:** Friday, December 23, 2016 1:39:30 PM

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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

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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

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Mount Shasta, CA 96067  
(530) 926-2184  
(530) 598-2802 (Mobile)  
(530) 926-1830 (FAX)

# **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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## **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.

**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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Comment Letter C25

**From:** [Ana Holub](#)  
**To:** [Lassen Substation Project](#); [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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](http://www.anaholub.com) • [info@anaholub.com](mailto:info@anaholub.com)  
530-925-1081 PST  
P.O. Box 174, Mount Shasta, CA 96067

C25-1

# **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**

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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.

**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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Comment Letter C26

**From:** JOA  
**To:** Michael Rosauer; Robert Haga; Lassen Substation Project; [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov); [cgm@cpuc.ca.gov](mailto:cgm@cpuc.ca.gov)  
**Cc:** Dawn and Jane Roberts  
**Subject:** Lassen Substation Project  
**Date:** Friday, December 23, 2016 9:20:03 PM

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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

# **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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## **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.

**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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Comment Letter C27

**From:** [Carol Jenkins](#)  
**To:** [Lassen Substation Project](#); [michael.rosaurer@cpuc.ca.gov](mailto:michael.rosaurer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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](#)

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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](#)

**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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## **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.

**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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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

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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.

C28-1

Bill Korbel

# **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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## **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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# 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@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

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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

# **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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## **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.

# **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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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

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To: [LassenSubstation@dudek.com](mailto:LassenSubstation@dudek.com)  
cc: Michael Rosauer <[michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov)>  
cc: Robert Haga <[robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov)>  
cc: [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov)

To: [LassenSubstation@dudek.com](mailto:LassenSubstation@dudek.com)  
cc: Michael Rosauer Michael [rosauer@cpuc.ca.gov](mailto:rosauer@cpuc.ca.gov)  
cc: Robert Haga [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov)  
cc: [pod@cpuc.ca.gov](mailto: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

# **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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## **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.

**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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Comment Letter C31

**From:** [Tracie Lin](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov)  
**Subject:** Crystal Geyser and Lassen Substation  
**Date:** Friday, December 23, 2016 11:33:33 AM

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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

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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

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C31-1  
Cont.  
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# **Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project**

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## **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.

**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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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

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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

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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 out 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

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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

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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  
Cont.

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

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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"

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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

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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

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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

**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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## **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](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov); [com@cpuc.ca.gov](mailto:com@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

# **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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## **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.

**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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Comment Letter C35

**From:** [David Moss](#)  
**To:** [Lassen Substation Project](#); cc: Michael Rosauer; cc: Robert Haga; [pod@cpuc.ca.gov](mailto: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

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## ***Notice of Intent to adopt a Mitigated Negative Declaration PacifiCorp Lassen Substation Project Application No A.15-11-005***

To: [LassenSubstation@dudek.com](mailto:LassenSubstation@dudek.com)  
cc: Michael Rosauer <[michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov)>  
cc: Robert Haga <[robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov)>  
cc: [pod@cpuc.ca.gov](mailto: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

# **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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## **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

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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](#)

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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

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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

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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

↑  
C36-1  
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**

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## **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.

# **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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Comment Letter C37

**From:** [cpreus@finestplanet.com](mailto:cpreus@finestplanet.com)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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.

# **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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## **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

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Comment Letter C38

**From:** [Carolyn Real](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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

# **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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## **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](mailto: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

# **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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## **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

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Comment Letter C40

**From:** [Touson S.](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov)  
**Subject:** lassen substation  
**Date:** Friday, December 23, 2016 5:10:18 PM

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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**

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## **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

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## Comment Letter C41

**From:** [Bruce Shoemaker](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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**

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## **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

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## 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

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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**

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## **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

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Comment Letter C43

**From:** [Ray Strack](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto:pod@cpuc.ca.gov); [cgm@cpuc.ca.gov](mailto: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 4:57:26 PM

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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

# **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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## **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

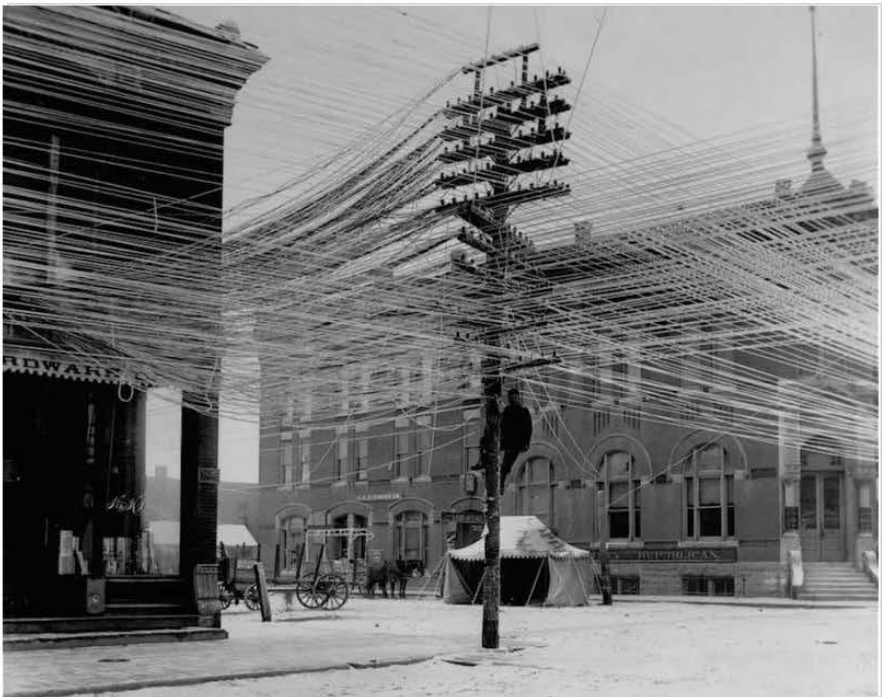
**From:** Frank Toriello  
**To:** Lassen Substation Project  
**Cc:** michael.zosauer@cpuc.ca.gov; Robert.haga@cpuc.ca.gov; pod@cpuc.ca.gov; cam@cpuc.ca.gov  
**Subject:** Notice of Intent to adopt a Mitigated Negative Declaration (MND) PacifiCorp Lassen Substation Project Application No A.15-11-005  
**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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# **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](#)  
[Mt%20Shasta%20Tour%20Group\[1\].jpg](#)  
[Icid\\_10FE4098FA824E059EE478FC49828813@UsuarioPC\[1\].jpg](#)  
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[0641-800x600\[1\].jpg](#)  
[Upper%20Sc%20Banner\[1\].jpg](#)  
[McCloud%20Banner%20logo\[1\].jpg](#)  
[McCloud%20Lecture%20Club%20Ad\[2\].jpg](#)  
[McCloud%20Lecture%20Club%20Ad\[2\].jpg](#)  
[logo%20banner%20\[9%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](http://www.mtshasta.com) I also own Jack Trout Guide Service as well as [tourmtshasta.com](http://tourmtshasta.com) & [jacktrout.com](http://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

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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**

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## **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%201[1].png  
Mt%20Shasta%20Tour%20Group[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%201%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](http://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

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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**

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## **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

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Comment Letter C47

From: [lookingup@finestplanet.com](mailto:lookingup@finestplanet.com)  
To: [Lassen Substation Project](#)  
Cc: [Michael Rosauer](#); [Robert Haga](#); [pod@cpuc.ca.gov](mailto: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

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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

# **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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## **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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# 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](mailto:michael.rosauer@cpuc.ca.gov); [robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov); [pod@cpuc.ca.gov](mailto: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

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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**

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## **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

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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

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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](mailto: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](mailto:LassenSubstatio@dudek.com)>, <[michael.rosauer@cpuc.ca.gov](mailto:michael.rosauer@cpuc.ca.gov)>, <[robert.haga@cpuc.ca.gov](mailto:robert.haga@cpuc.ca.gov)>, <[pod@cpuc.ca.gov](mailto: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 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**

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## **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.

**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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Comment Letter C50

**From:** [Dorian Aiello](#)  
**To:** [Lassen Substation Project](#)  
**Subject:** Support of project  
**Date:** Tuesday, December 27, 2016 11:13:21 AM

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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

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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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Comment Letter C51

**From:** [Jim Cody](#)  
**To:** [Lassen Substation Project](#)  
**Cc:** [robert.haga@cpuc.ca.gov](mailto: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](#)

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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

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## **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.

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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

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# **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**

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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.



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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

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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

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C53-1  
Cont.  
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# **Final Initial Study and Mitigated Negative Declaration for PacifiCorp Lassen Substation Project**

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## **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.

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Comment Letter C54

**JOHN E. KENNEDY, Sr.**

709 Rockfellow Dr.  
Mount Shasta, Ca 96067  
530 859-1845  
[theden@snowcrest.net](mailto: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

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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.

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## **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.

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## **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](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.

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