APPENDIX B

Scoping Report

California Public Utilities Commission

Collinsville 500/230 kV Substation Project

Scoping Report

February 2025

717 Market Street, Suite 400
San Francisco, CA 94103
650-373-1200
www.panoramaenv.com

PANORAMA ENVIRONMENTAL, INC.

California Public Utilities Commission

Collinsville 500/230 kV Substation Project Scoping Report

February 2025

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

Prepared by:
Panorama Environmental, Inc.
717 Market Street, Suite 400
San Francisco, CA 94103
650-373-1200
tania.treis@panoramaenv.com

PANORAMA ENVIRONMENTAL, INC.

Table of Contents

TABLE OF CONTENTS

List of Tables

List of Figures

TABLE OF CONTENTS

This page is intentionally left blank.

1 Introduction

1.1 Project Background

1.1.1 Project Overview

LS Power Grid California, LLC's (LSPGC) submitted an application (A2407018) for a certificate of Public Convenience and Necessity (CPCN) for the Collinsville 500/230 kilovolt Substation Project (Proposed Project) on July 29, 2024. The application was deemed complete on December 11, 2024. The LSPGC CPCN application includes the construction and/or modification, operation, and maintenance of the following components:

- Constructing a new LSPGC Collinsville Substation
- Constructing a new approximately 6-mile long, double-circuit LSPGC 230 kV Transmission Line to connect the proposed LSPGC Collinsville Substation to PG&E's existing Pittsburg Substation. The LSPGC 230 kV Transmission Line includes the following segments:
  - Overhead Segment
  - Submarine Segment
  - Underground Segment
- Constructing two new telecommunications paths to the proposed LSPGC Collinsville Substation
- Constructing a PG&E 500 kV Interconnection Loop, transposition sites, and extending the PG&E 12 kV Distribution Line
- Modifications to PG&E's existing substations

The Proposed Project is located within Solano, Sacramento, Alameda, and Contra Costa counties in California. The project is shown in Figure 1-1 and Figure 1-2.

Figure 1-1 Proposed Project Overview

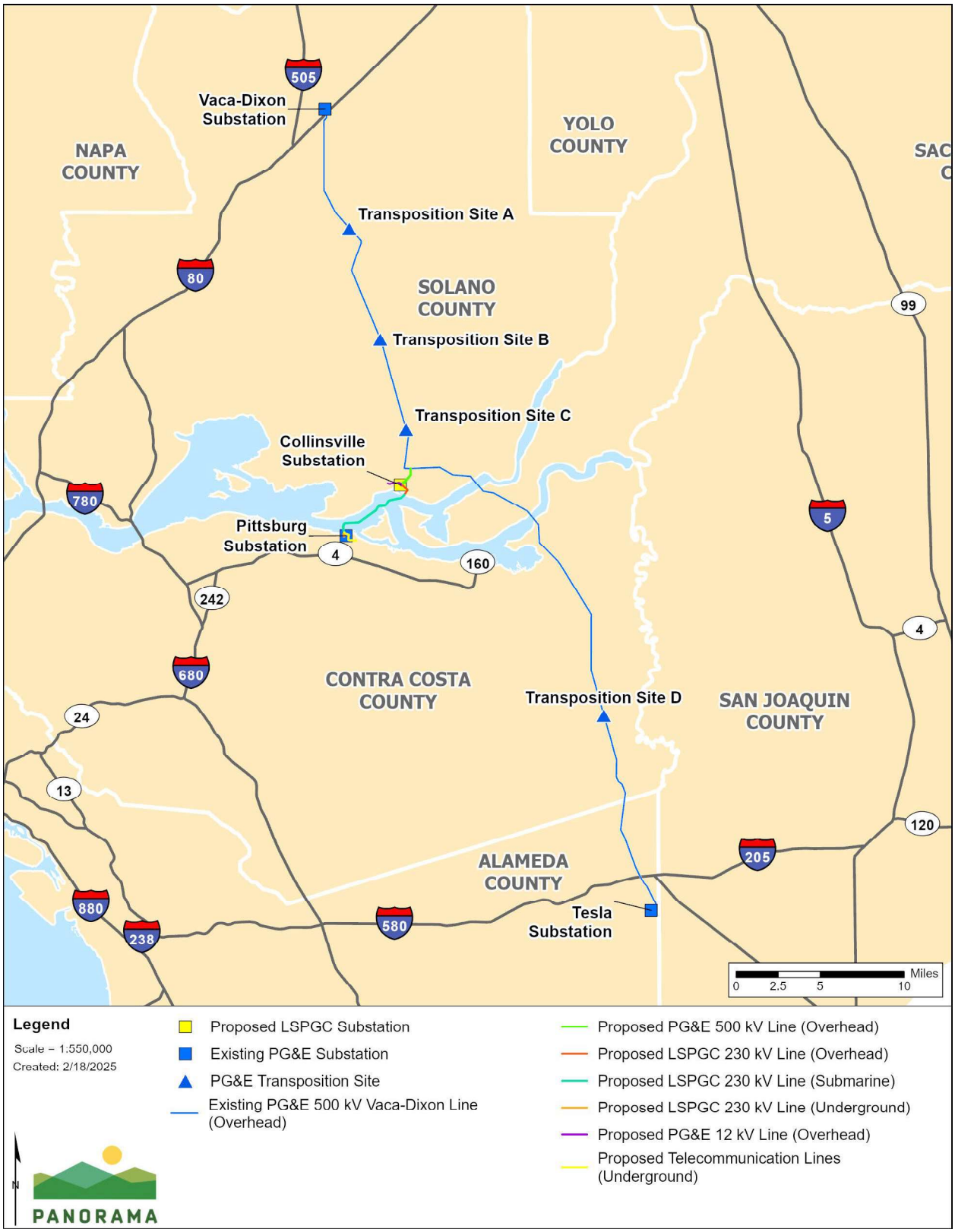
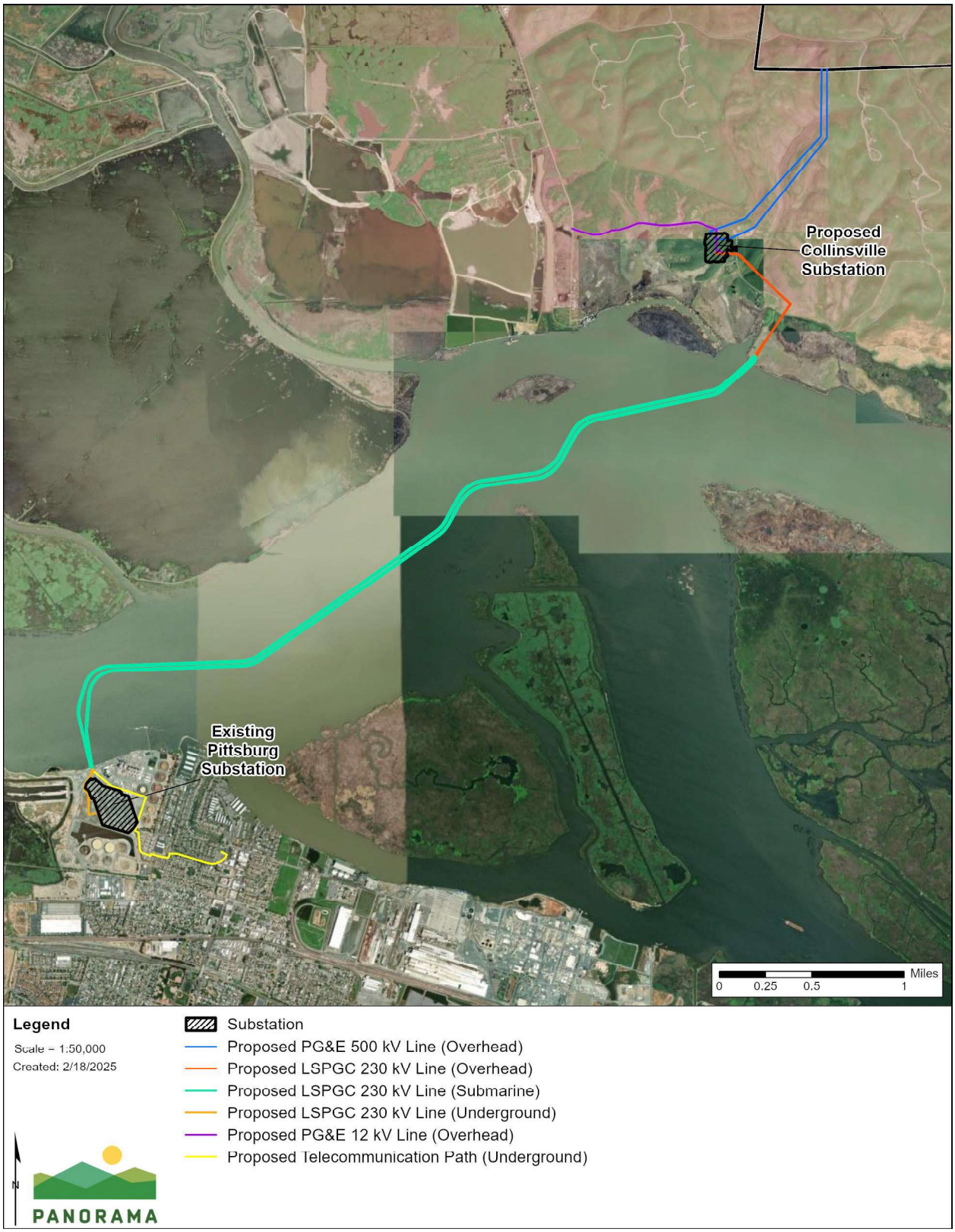


Figure 1-2 Proposed Project Alignments



1.1.2 California Environmental Quality Act Review

The California Public Utilities Commission (CPUC) is the lead agency for reviewing the Proposed Project under the California Environmental Quality Act (CEQA) because it has the principal responsibility for approving the Proposed Project (i.e., it must decide whether to approve or deny a Certificate of Public Convenience and Necessity [CPCN]).

1.2 Purpose of Scoping

This scoping report describes the CPUC's CEQA scoping process and contains the comments received on the Proposed Project during the Environmental Impact Report (EIR) scoping period. The CPUC will use scoping comments to:

- Define the issues and alternatives for the Proposed Project for evaluation in the EIR
- Focus the environmental analysis
- Identify potential environmental impacts for consideration in the EIR
- Identify potential mitigation measures for consideration in the EIR

Comments received during the scoping process are part of the public record as documented in this scoping report. The comments and questions received during the public scoping process have been reviewed and considered by the CPUC in determining the appropriate scope of issues to be addressed in the EIR.

2 Scoping Outreach

The CEQA process provides opportunities for agencies, organizations, and individuals to provide input. This section describes the scoping process and how the CPUC provided notice to the public on how to participate in the CEQA process.

2.1 Notice of Preparation

The CPUC issued an NOP on January 7, 2025, to inform the public and agencies of its intention to prepare an EIR. The NOP solicited comments on the scope of the EIR during a 30-day scoping period, which began on January 7, 2025, and ended on February 6, 2025. A copy of the NOP is provided in Appendix A. Table 2-1 contains CEQA NOP and noticing requirements and describes how the CPUC fulfilled each requirement.

Table 2-1 Summary of CEQA NOP Requirements and CPUC Noticing

CEQA Requirements	Noticing Conducted by the CPUC
To each responsible[a] and trustee[b] agency advising them of its intention to prepare an EIR (CEQA Guidelines § 15082).	1. NOP and internet website address sent via electronic mail to relevant a. Federal, State, and Local Agencies b. Tribal Governments c. Elected Officials
Consultation with persons and organizations prior to completing the Draft EIR is optional under CEQA. When such scoping occurs, it should be a part of agency consultation under Section 15082 to the extent that combining agency consultation and public scoping is feasible (CEQA Guidelines § 15083).	1. Posted NOP, virtual scoping meeting time and Zoom link on the CPUC project website 2. NOP filed with the County Clerk for Solano, Contra Costa, Sacramento, and Alameda Counties 3. Mailed post card including website address and scoping meeting information to the following parties: a. Residents within 300 feet of the project alignment b. Parties who requested notification or submitted their addresses c. Contacts previously notified by the LSPGC d. CPUC Service List for the Proposed Project

Notes:

[a] Any public agency, other than the lead agency, which has discretionary approval power over a project (CEQA Guidelines § 15381).

[b] State agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of California (CEQA Guidelines § 15386).

2.2 Outreach with Landowners and Residents

Scoping period notices, including the date and virtual scoping meeting link, were provided to landowners within 300 feet of the Proposed Project, parties who requested notification, and contacts previously notified by the LSPGC. The post card notice is provided in Appendix B. The post card notice was sent to 431 addresses.

2.3 Outreach with Agencies

The CPUC sent the NOP to the federal, state, and local agencies identified in Table 2-2. In addition, emails with information about the CPUC's scoping process for the project were sent to agencies if email addresses were available in the contact list provided by LSPGC.

Table 2-2 Agencies Notified

Agencies
Federal Agencies
U.S. Army Corps of Engineers (USACE) – Sacramento and San Francisco Districts
National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries) – West Coast Region
U.S. Coast Guard (USCG)
Federal Aviation Administration (FAA), Western-Pacific Region
Travis Air Force Base
Department of Defense (DoD), Military Aviation and Installation Assurance Siting Clearinghouse
U.S. Fish and Wildlife Service (USFWS) – Region 8
State Agencies
California Air Resources Board
California Department of Fish and Wildlife (CDFW) – Region 3
California Department of Transportation (Caltrans) – District 4
Caltrans, Division of Aeronautics
California Energy Commission
California Independent System Operator (CAISO)
California Native American Heritage Commission (NAHC)
California Natural Resources Agency
California Office of Historic Preservation
CPUC, Energy Division

Agencies
CPUC, Public Advisor's Office
CPUC, Public Advocates Office
California State Land Commission (CSLC)
Delta Protection Commission
Department of Health Care Services
State Water Resources Control Board (SWRCB)
Regional Agencies
Bay Area Air Quality Management District
Central Valley Flood Protection Control Board (CVFPB)
Regional Water Resource Control Board, Central Valley (Region 5) (CVRWQCB)
Regional Water Resource Control Board, San Francisco Bay (Region 2) (SFRWQCB)
Sacramento Metropolitan Air Quality Management District
San Francisco Bay Conservation and Development Commission (BCDC)
County Agencies
Contra Costa County Board of Supervisors
Contra Costa County Planning Commission
Contra Costa Water District
Sacramento County Board of Supervisors
Sacramento County Planning Commission
Sacramento Municipal Utility District
Solano County Board of Supervisors
Solano County Planning Commission
Solano County Water Agency
Local Agencies
City of Pittsburg, City Council
City of Pittsburg, Planning Commission

2.4 Outreach with Native American Tribes

The CPUC sent the NOP to 22 Native American tribes identified by the Native American Heritage Commission (NAHC) as having cultural affiliation with the Project area. In addition,

the CPUC conducted separate outreach with Native American tribes before and during the scoping period in compliance with Assembly Bill (AB) 52. Two additional tribes were notified about the project during the scoping period and were not sent separate NOP postcards, including Costanoan Rumsen Carmel Tribe and Wuksachi Indian Tribe/Eshom Valley Band. Table 2-3 lists the tribes that were notified about the project.

Table 2-3 Native American Tribes Notified

Native American Tribes
Amah Mutsun Tribal Band of Mission San Juan Bautista
Amah Mutsun Tribal Band
Buena Vista Rancheria of Me-Wuk Indians
Cachil Dehe Band of Wintun Indians of the Colusa Indian Community
Calaveras Band of Mi-Wuk Indians
Chicken Ranch Rancheria of Me-Wuk Indians
Confederated Villages of Lisjan Nation
Cortina Rancheria - Kletsel Dehe Band of Wintun Indians
Grindstone Rancheria of Wintun-Wailaki
Guidiville Rancheria of California
Indian Canyon Mutsun Band of Costanoan
Ione Band of Miwok Indians
Jackson Rancheria Band of Miwuk Indians
Muwekma Ohlone Tribe of the SF Bay Area
Nashville Enterprise Miwok-Maidu-Nishinam Tribe
Northern Valley Yokut / Ohlone Tribe
Pakan'yani Maidu of Strawberry Valley Rancheria
The Ohlone Indian Tribe
Tule River Indian Tribe
United Auburn Indian Community of the Auburn Rancheria
Wilton Rancheria
Yocha Dehe Wintun Nation
Costanoan Rumsen Carmel Tribe
Wuksachi Indian Tribe/Eshom Valley Band

2.5 Public Scoping Meeting

The CPUC held a virtual public scoping meeting via Zoom on January 21, 2025. The CPUC gave a presentation describing the CEQA review process and LSPGC's Proposed Project. The CPUC provided the opportunity to verbally comment and/or provide written comments at the scoping meeting, however the public did not provide any scoping comments at that time. The scoping meeting presentation is provided in Appendix C.

2.6 Methods of Communication

2.6.1 Email Address

The CPUC established an email address for the Proposed Project (collinsville@panoramaenv.com) to provide an alternate means of submitting comments on the scope of the EIR. The email address was provided on scoping meeting materials, such as the NOP, the scoping meeting presentation, and the post cards, in addition to being posted on the CPUC website, described below. The CPUC has considered all scoping comments received by email during the scoping period and has incorporated them into this report.

2.6.2 Project Website

The CPUC publicized information about the Proposed Project through a project website. The website is updated routinely and contains information about the Proposed Project and the CPUC's environmental review process. During the scoping period, the website included electronic versions of the project application and Proponent's Environmental Assessment (PEA) materials, application review materials including identified deficiencies, data need requests, and responses from LSPGC and PG&E, a project fact sheet, the NOP, and information regarding the location and time of the virtual scoping meeting.

https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

3 Scoping Comments

3.1 Summary of Commenters

This section summarizes the comments raised by the public and agencies during the scoping process for the Draft EIR. The CPUC received a total of 11comment transmittals (10 via email and 1 via standard mail) during the scoping period, 10 of which included substantive comments. No oral or written comments were submitted during the scoping meeting. Comments received during the comment period, as well as any comments received after the production of this scoping report, will be entered into the project administrative record and considered during the preparation of the EIR. A summary of comments is provided in Section 3.2. All written comments received during the scoping period are provided in Appendix D.

Table 3-1 Summary of Commenters

Commenter	Date
Federal Agencies	
DoD[a]	January 6, 2025
State Agencies	
Delta Protection Commission	January 13, 2025
California State Lands Commission	February 6, 2025
Caltrans, District 4	February 5, 2025
NAHC	January 14, 2025
Regional Agencies	
Sacramento Metropolitan Air Quality Management District	January 13, 2025
Central Valley Flood Protection Board	January 3, 2025
Regional Water Resource Control Board (RWQCB), Central Valley (Region 5)	February 6, 2025
Local Agencies	
Solano County Water Agency	February 5, 2025
Sacramento Municipal Utility District	February 6, 2025
Private Business/Landowners	
California Forever (represented by Holland & Knight LLP)	February 6, 2025

Notes:

[a] Correspondence with the DoD consisted of answering informational questions. The DoD did not submit formal scoping comments or identify any concerns about the project.

3.2 Summary of Comments and Issues to be Considered

A total of 10 substantive scoping comment transmittals were received by email during the scoping period. Appendix D includes copies of all comment letter in their original format. Table 3-2 below provides a summary of the key comments and issues raised in the scoping letters. The substantive comments applicable to environmental review under CEQA will be considered in the EIR.

Table 3-2 Summary of Comments and Issues to be Considered

Topic	Comment Summary	Commenter
Project Description	The Project Description should describe the details of all proposed activities, including the timing and length of activities, and address the Median High Tide Line of the Sacramento River.	CSLC
	The Project Description should be accurate and reflect reasonably foreseeable transmission upgrades.	CA Forever
	The Project should ensure that all relevant information regarding substation connections is submitted to the CPUC. The EIR should include analysis of the high-voltage direct current (HVDC) Line as part of the Project.	CA Forever
	The EIR analysis should not be piecemealed and should include discussion regarding the Humboldt 500 kV Substation connection.	CA Forever
	Th EIR should address cumulative impacts presented by the HVDC Line.	CA Forever
	The EIR should analyze the impacts of all ancillary project components.	CA Forever
Alternatives	The EIR should analyze a range of reasonable project alternatives and consider alternatives that use Horizontal Directional Drilling methods.	CSLC
	The Project should analyze a range of reasonable alternatives and consider an alternate substation location.	CA Forever
Aesthetics	The EIR should analyze new sources of light and glare and assess how the transmission towers and lines would impact visual resources.	CA Forever
Agricultural Resources	The EIR should analyze how the Project and HVDC Line would impact agricultural resources and farmland.	CA Forever

Topic	Comment Summary	Commenter
Air Quality and Greenhouse Gas Impacts	The EIR should analyze emission impacts and ensure the Project, and HVDC line, would not conflict with an existing air quality plan.	CA Forever
Biological Resources	The EIR should analyze impacts to sensitive and special status species and habitats occurring on CSLC lands under the project.	CSLC
	Any consultation with CDFW, USFWS, and NOAA fisheries should be discussed in the EIR, including permitting information.	CSLC
	The EIR should analyze impacts related to aquatic invasive species. The Commission's Marine Invasive Species Program can be used as a potential resource for any required mitigation.	CSLC
	The EIR should analyze potential effects to sensitive and special status species along the HVDC Line, including Suisun Bay watershed, the Mendocino National Forest, and the proposed PG&E Montezuma Island Mitigation Bank.	CA Forever
	The EIR should analyze collision and electrocution risk to sensitive bird species created by transmission lines	CA Forever
	Expressed concerns regarding the Project design impacts on species. Requested consultation on addressing identified issues.	Sacramento Municipal Utility District
Cultural Resources	The EIR should analyze potential impacts on submerged cultural resources in the Project area. The Commission's shipwreck database could be used to obtain relevant shipwreck data.	CSLC
	The EIR should include specific language in the Mitigation, Monitoring and Reporting Plan regarding the CSLC's authority and jurisdiction over archaeological, historical, and paleontological resources recovered on state lands.	CSLC
	The EIR should analyze ground disturbance impacts on cultural and tribal cultural resources.	CA Forever
Hazards and Hazardous Materials	The EIR should ensure that the Project does not disproportionately affect environmental justice communities by using environmental screening tools and stakeholder engagement,	CSLC
Hydrology and Water Quality	The EIR should address how proposed structures would be protected against sea level rise, flood events, and storm events.	CSLC
	Shares project's relation to the Board Adopted Plan of Flood Control.	Central Valley Flood Protection Board

Topic	Comment Summary	Commenter
	Provided background information regarding basin plans.	CVRWQCB
	The EIR should ensure wastewater discharge complies with the Basin Plan	CVRWQCB
	Shares General Permit for Storm Water Discharge and Storm Water Pollution Prevention Plans requirements.	CVRWQCB
	The Project must obtain a Section 404 permit with the USACE if it meets the requirement criteria.	CVRWQCB
	The Project must obtain a Water Quality Certification from the Central Valley Water Board if it meets the requirement criteria.	CVRWQCB
	The Project must obtain a Waste Discharge Requirement (WDR) permit from the Central Valley Water Board if it meets the requirement criteria.	CVRWQCB
	Shares information regarding the State Water Board General Water Quality Order (Low Threat General Orde)r.	CVRWQCB
	The Project must obtain appropriate coverage under the National pollutant Discharge Elimination System permit and General Order for Limited Threat Discharges to Surface Water if construction dewatering, groundwater discharge, dewatering discharge, or waste discharge would occur under the Project.	CVRWQCB
	There are no potential impacts to Solano County Water Agency facilities or infrastructure as a result of the Project.	Solano County Water Agency
	Any required permits should be included in the record for planning purposes.	Central Valley Regional Water Quality Control Board
Land Use, Agriculture and Forestry Resources	Concerns regarding land use restrictions impacting agricultural uses in the area and ensuring appropriate mitigation would be followed for agricultural lands.	Delta Protection Commission
Land Use, Mineral Resources	Confirms the Project's location is within State sovereign land and shares the appropriate State Lands Commission project application link.	CSLC
	Shares information regarding commission-issued lease 7781 for the extraction of sand and gravel for commercial use. Requests the Project be designed to minimize conflicts with this lease area. Requests CPUC review information related to the San Francisco Bay and Delta Sand Mining Project.	CSLC
Mineral Resources, Cumulative Impacts	The EIR should analyze cumulative impacts with nearby mining leases and USACE activities.	CSLC

Topic	Comment Summary	Commenter
Noise	The EIR should analyze noise impacts, including corona noise, during construction and operation of the Project.	CA Forever
Noise, Biological Resources	The EIR should analyze the effects of noise and vibration on fish and birds and consult appropriate agencies.	CSLC
Noise, Transportation	The EIR should analyze impacts to the state right-of-way resulting from project-related temporary access points and identify appropriate mitigation relevant to transportation and noise, if necessary. Potential development of a Transportation Management Plan in consultation with Caltrans.	Caltrans
Transportation, Hydrology	The EIR should address navigation impacts in coordination with the CSLC and USACE, ensuring all appropriate permits/approvals are obtained.	Delta Protection Commission
Transportation	Provides resources to be used for transportation impact analysis.	Caltrans
	Shares environmental justice information and requests consultation regarding climate change adaptation and resilience initiatives the Project employs.	Caltrans
	Interest in collaborative efforts regarding climate stressors, adaptation, and resiliency initiatives relevant to the Project location.	Caltrans
Tribal Cultural Resources	Request for formal consultation with any tribes that may be impacted and assurance that tribes would receive proper notice AB 52 and SB 18 consultation requirements.	NAHC
	Provides information relevant to tribal mitigation measures and monitoring including information regarding the California Historical Research Information System (CHRIS) Center, survey requirements, and NAHC Sacred Lands File.	NAHC
Utilities and Service Systems	The EIR should analyze impacts to Sacramento Municipal Utility District wind turbines, underground electrical lines, and the Solano Wind Project access roads.	Sacramento Municipal Utility District
Wildfires, Hazards and Hazardous Materials	The EIR should analyze the Project's potential to increase wildfire risk, and any associated Project health hazards, including impacts related to the HVDC line.	CA Forever
Mitigation Measures	Mitigation measures should be specific, feasible, and fully enforceable to minimize significant adverse impacts. Comment requests that any mitigation measure include specific information regarding how impacts would be reduced to less-than-significant levels.	CSLC

Appendix A Notice of Preparation

Notice of Preparation

of an Environmental Impact Report and
Notice of Public Scoping for the
Collinsville 500/230 Kilovolt Substation Project
Application No. A.24-07-018

A. Introduction

LS Power Grid California, LLC (LSPGC) filed an application for a Certificate of Public Convenience and Necessity (CPCN) (Application No. A.24-07-018) with the California Public Utilities Commission (CPUC) for the Collinsville 500/230 Kilovolt (kV) Substation Project, referred to as the Proposed Project. The CPUC, pursuant to the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) to analyze environmental effects that would result from the Proposed Project if LSPGC's application is approved.

Additional information about the Proposed Project and CEQA review process is available on the CPUC's website: https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

What is the Notice of Preparation?

The purpose of this Notice of Preparation (NOP) is to inform recipients that the CPUC is beginning preparation of an EIR for the Proposed Project and to solicit information that will be helpful in determining the scope of the environmental review. As required by CEQA, this NOP is being sent to interested agencies and members of the public. This notice includes:

- A description of the Proposed Project (refer to Section B)
- Figures 1 and 2 identifying the locations of Proposed Project features (attached)
- A summary of the CEQA review process and the analysis of potential environmental effects (refer to Section C)
- A description of the CPUC's scoping process (refer to Sections D and E)

What is Scoping?

Scoping is the process of soliciting input regarding the scope and content of the EIR and project alternatives to consider. A virtual public scoping meeting will be held on January 21, 2025 (refer to Section D for details). Scoping comments may be submitted to the CPUC through February 6, 2025 (refer to Section E for details). The CPUC will prepare a Scoping Report to summarize comments submitted during the scoping period, which will be published on the project website once completed.

B. Project Description

The California Independent System Operators (CAISO) 2021-2022 Transmission Plan identified the Proposed Project as a needed upgrade to the California electric grid. The main components of the Proposed Project include the following (see Figures 1 and 2 attached):

- Constructing a new 500/230 kV substation ("Collinsville Substation"). The proposed substation site is located adjacent to Stratton Lane approximately 0.8-mile northeast of the unincorporated community of Collinsville.
- Constructing two self-supporting segments of new 500 kV conductor and structures roughly parallel along the approximately 1.2-mile interconnection route (or "loop") between the proposed LSPGC Collinsville Substation and Pacific Gas and Electric Company's (PG&E) existing Vaca Dixon-Tesla 500 kV Transmission Line, resulting in the addition of approximately 2.4 miles of new 500 kV transmission lines.
- Constructing a new approximately 6-mile-long, double-circuit 230 kV transmission line that would connect the proposed LSPGC Collinsville Substation to PG&E's existing Pittsburg Substation, with approximately 4.5 miles of submarine cables running beneath the Sacramento-San Joaquin River Delta waterways. The submarine cables would be buried to a depth of approximately 6 to 15 feet below the sediment surface between an in-river transition structure just off the northern shore of the Sacramento River and an underground utility vault on the southern shore of the Sacramento River near the Pittsburg Substation.
- Extending and connecting an existing PG&E 12 kV distribution line to the proposed substation (approximately 0.9 mile long and parallel to Stratton Lane).
- Constructing new telecommunications paths collocated with the new transmission lines, a new microwave tower immediately adjacent to the proposed substation, and a new fiber optic path between existing fiber in the City of Pittsburg and the proposed Collinsville Substation (approximately 1.2 miles).
- Modifying PG&E's existing Pittsburg, Vaca Dixon, and Tesla substations to support the proposed substation interconnection. All PG&E substation modifications would occur within the existing substation footprints.

The proposed substation and 230 kV transmission line would be constructed by LSPGC. PG&E would construct the 500 kV transmission interconnection, 12 kV distribution line, and microwave tower, and modify their existing substations. Construction is proposed to begin in early 2026 and would take approximately 24 months to complete. The project's proposed in-service date is June 1, 2028, per the CAISO's technical specifications.

C. CEQA Review Process and Analysis of Potential Environmental Effects

Impact Analysis and Mitigation Measures

The CPUC intends to prepare an EIR to evaluate potential environmental effects of the Proposed Project as well as selected project alternatives, and to propose mitigation measures to address any significant effects that are identified. At a minimum, the EIR will evaluate impacts consistent with the criteria identified in CEQA Statute and Guidelines for the following topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

The EIR will present impact significance determinations after the full and thorough consideration of all impacts. The EIR will evaluate the effectiveness of measures that are proposed by LSPGC and PG&E to avoid or minimize impacts. The EIR will also include an analysis of additional issues identified during the scoping process and the project's cumulative impacts (project impacts combined with other present and planned projects in the area).

Project Alternatives

The EIR will contain an evaluation of a range of alternatives to the Proposed Project that could potentially reduce, eliminate, or avoid one or more significant environmental effects of the Proposed Project. The EIR will also include an evaluation of the comparative environmental impacts of the alternatives, including the "No Project Alternative" pursuant to CEQA. The No Project Alternative will describe the conditions that would likely occur if neither the Proposed Project nor its alternatives were implemented.

D. Public Scoping Meeting

The CPUC will conduct a virtual public scoping meeting on January 21, 2025. Details about the meeting and how to participate are provided below. The purpose of the scoping meeting is to present information about the Proposed Project and the CPUC's CEQA review process.

Location:	Virtual Meeting via Zoom
Date/Time:	Tuesday, January 21, 2025, 6:00 p.m.
Meeting Link:	https://us02web.zoom.us/j/85419431269
Meeting ID:	854 1943 1269
Call-In Number (Optional):	(669) 900-9128

E. Scoping Comments

The CPUC is soliciting scoping comments regarding environmental impacts to address in the EIR and potential project alternatives to consider. The scoping comment period is for 30 days from January 7, 2025, through February 6, 2025. The comment period closes on February 6, 2025, at 5:00 p.m. Methods for submitting scoping comments include the following:

1. **Electronic Mail**: Email communications to collinsville@panoramaenv.com is the CPUC's preferred method for submitting comments. Please include your name and mailing address in the email message.
2. **U.S. Mail**: Written comments may be sent by U.S. mail to the address provided below. Please use first class mail and be sure to include your name and a return address.

   Connie Chen (CPUC Project Manager)
   Collinsville Substation Project
   c/o Panorama Environmental, Inc
   717 Market Street, Suite 400,
   San Francisco, CA 94103

3. **Public Scoping Meeting**: Verbal comments may also be accepted during the scoping meeting depending on the number of participants that wish to speak. Please submit your comment in writing to ensure it is received.

F. For Additional Project Information

- **Project Website:** https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html
- **Project Email:** collinsville@panoramaenv.com
- **Project Phone Line:** (650) 290-7213

G. Issuance of NOP

The CPUC hereby issues this NOP of an EIR for the Collinsville 500/230 Kilovolt (kV) Substation Project on January 7, 2024. If you have any questions, please contact me by email at connie.chen@cpuc.ca.gov or by phone at (415) 703-2124.

Figure 1 Project Overview Map

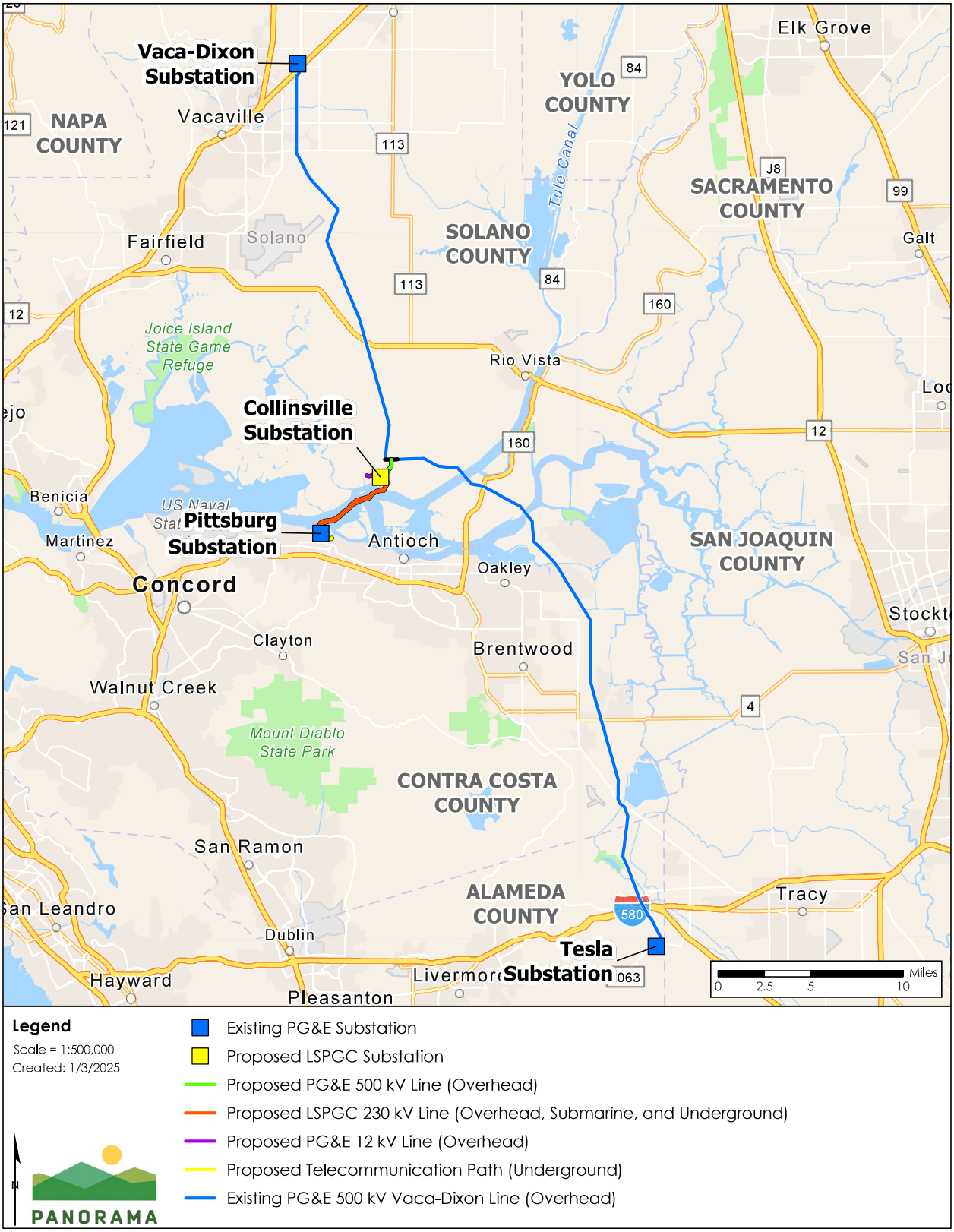
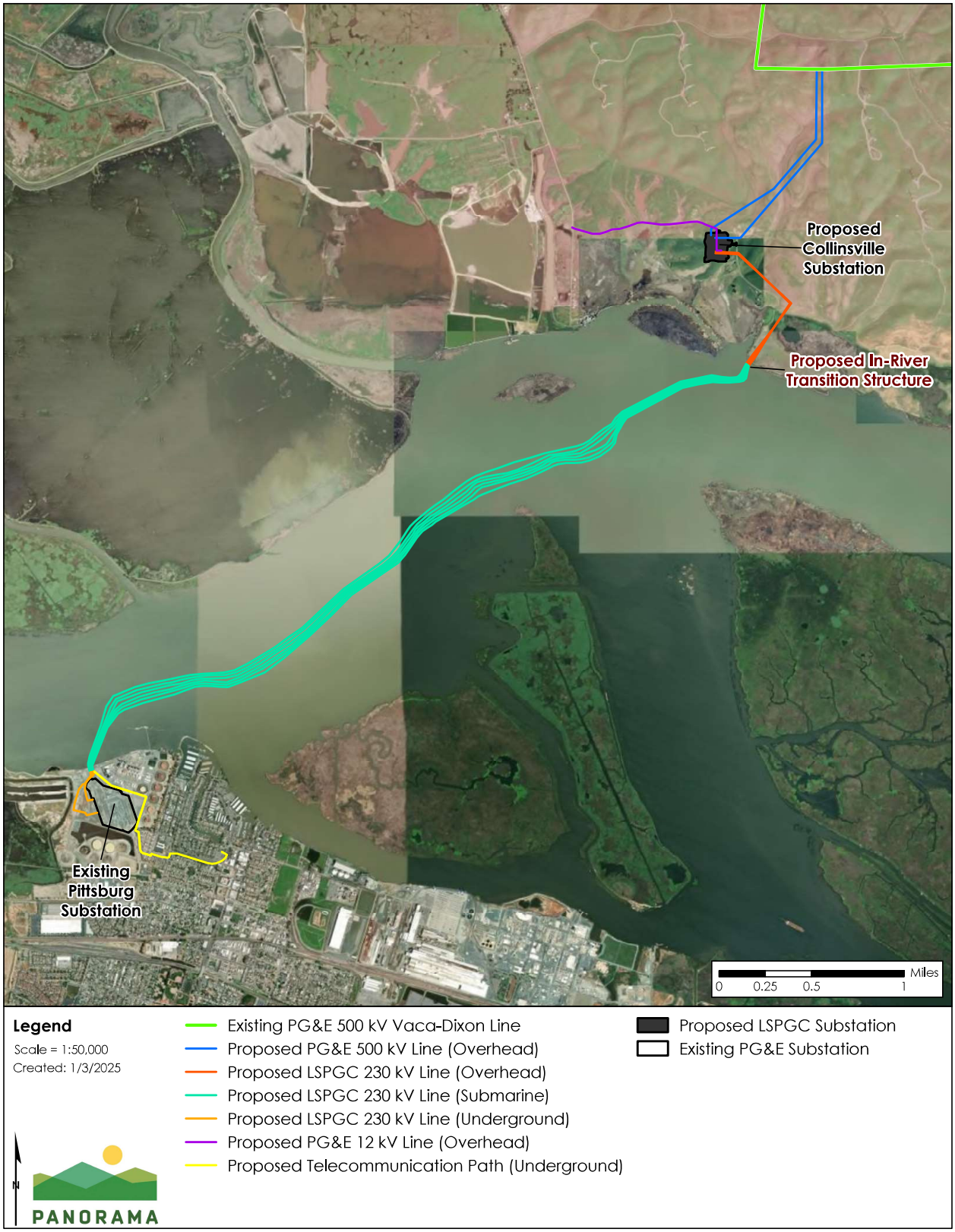


Figure 2 Project Layout Map



Appendix B Scoping Post Card

NOTICE OF PUBLIC SCOPING

The California Public Utilities Commission (CPUC) is requesting public input on the scope of environmental issues to be addressed in the California Environmental Quality Act (CEQA) document prepared for LS Power Grid California, LLC's (LSPGC) Collinsville 500/230 Kilovolt (kV) Substation Project (Project).

The Project includes proposed activities that would occur in Solano, Sacramento, Contra Costa, and Alameda counties, which involve the proposed construction and operation of a 500/230 kV substation, 2.5-mile-long 500 kV transmission interconnection, 6-mile-long 230 kV transmission line, and associated electrical and telecommunications infrastructure. In addition, the Project would require Pacific Gas and Electric Company (PG&E) to make modifications to their existing Pittsburg, Vaca Dixon, and Tesla substations, and their existing Vaca Dixon-Tesla 500 kV transmission line. Additional information about the Project is available on the CPUC's website: https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

The CPUC will prepare an environmental document pursuant to CEQA. Public comments regarding the scope and content of the environmental document and project alternatives to consider will be accepted until **February 6, 2025**. Comments may be sent by email to collinsville@panoramaenv.com or by mail to Connie Chen (CPUC Project Manager), Collinsville Substation Project, c/o Panorama Environmental, Inc., 717 Market Street, Suite 400, San Francisco, CA 94103. A virtual public scoping meeting will be held on **January 21, 2025, 6:00 p.m.** via Zoom: https://us02web.zoom.us/j/85419431269. Visit the CPUC's website link above for additional information about public scoping and the virtual meeting.

NOTICE OF PUBLIC SCOPING

The California Public Utilities Commission (CPUC) is requesting public input on the scope of environmental issues to be addressed in the California Environmental Quality Act (CEQA) document prepared for LS Power Grid California, LLC's (LSPGC) Collinsville 500/230 Kilovolt (kV) Substation Project (Project).

The Project includes proposed activities that would occur in Solano, Sacramento, Contra Costa, and Alameda counties, which involve the proposed construction and operation of a 500/230 kV substation, 2.5-mile-long 500 kV transmission interconnection, 6-mile-long 230 kV transmission line, and associated electrical and telecommunications infrastructure. In addition, the Project would require Pacific Gas and Electric Company (PG&E) to make modifications to their existing Pittsburg, Vaca Dixon, and Tesla substations, and their existing Vaca Dixon-Tesla 500 kV transmission line. Additional information about the Project is available on the CPUC's website: https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

The CPUC will prepare an environmental document pursuant to CEQA. Public comments regarding the scope and content of the environmental document and project alternatives to consider will be accepted until **February 6, 2025**. Comments may be sent by email to collinsville@panoramaenv.com or by mail to Connie Chen (CPUC Project Manager), Collinsville Substation Project, c/o Panorama Environmental, Inc., 717 Market Street, Suite 400, San Francisco, CA 94103. A virtual public scoping meeting will be held on **January 21, 2025, 6:00 p.m.** via Zoom: https://us02web.zoom.us/j/85419431269. Visit the CPUC's website link above for additional information about public scoping and the virtual meeting.

NOTICE OF PUBLIC SCOPING

The California Public Utilities Commission (CPUC) is requesting public input on the scope of environmental issues to be addressed in the California Environmental Quality Act (CEQA) document prepared for LS Power Grid California, LLC's (LSPGC) Collinsville 500/230 Kilovolt (kV) Substation Project (Project).

The Project includes proposed activities that would occur in Solano, Sacramento, Contra Costa, and Alameda counties, which involve the proposed construction and operation of a 500/230 kV substation, 2.5-mile-long 500 kV transmission interconnection, 6-mile-long 230 kV transmission line, and associated electrical and telecommunications infrastructure. In addition, the Project would require Pacific Gas and Electric Company (PG&E) to make modifications to their existing Pittsburg, Vaca Dixon, and Tesla substations, and their existing Vaca Dixon-Tesla 500 kV transmission line. Additional information about the Project is available on the CPUC's website: https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

The CPUC will prepare an environmental document pursuant to CEQA. Public comments regarding the scope and content of the environmental document and project alternatives to consider will be accepted until **February 6, 2025**. Comments may be sent by email to collinsville@panoramaenv.com or by mail to Connie Chen (CPUC Project Manager), Collinsville Substation Project, c/o Panorama Environmental, Inc., 717 Market Street, Suite 400, San Francisco, CA 94103. A virtual public scoping meeting will be held on **January 21, 2025, 6:00 p.m.** via Zoom: https://us02web.zoom.us/j/85419431269. Visit the CPUC's website link above for additional information about public scoping and the virtual meeting.

NOTICE OF PUBLIC SCOPING

The California Public Utilities Commission (CPUC) is requesting public input on the scope of environmental issues to be addressed in the California Environmental Quality Act (CEQA) document prepared for LS Power Grid California, LLC's (LSPGC) Collinsville 500/230 Kilovolt (kV) Substation Project (Project).

The Project includes proposed activities that would occur in Solano, Sacramento, Contra Costa, and Alameda counties, which involve the proposed construction and operation of a 500/230 kV substation, 2.5-mile-long 500 kV transmission interconnection, 6-mile-long 230 kV transmission line, and associated electrical and telecommunications infrastructure. In addition, the Project would require Pacific Gas and Electric Company (PG&E) to make modifications to their existing Pittsburg, Vaca Dixon, and Tesla substations, and their existing Vaca Dixon-Tesla 500 kV transmission line. Additional information about the Project is available on the CPUC's website: https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

The CPUC will prepare an environmental document pursuant to CEQA. Public comments regarding the scope and content of the environmental document and project alternatives to consider will be accepted until **February 6, 2025**. Comments may be sent by email to collinsville@panoramaenv.com or by mail to Connie Chen (CPUC Project Manager), Collinsville Substation Project, c/o Panorama Environmental, Inc., 717 Market Street, Suite 400, San Francisco, CA 94103. A virtual public scoping meeting will be held on **January 21, 2025, 6:00 p.m.** via Zoom: https://us02web.zoom.us/j/85419431269. Visit the CPUC's website link above for additional information about public scoping and the virtual meeting.

Appendix C Scoping Meeting Presentation

California Public Utilities Commission
Virtual Scoping Meeting

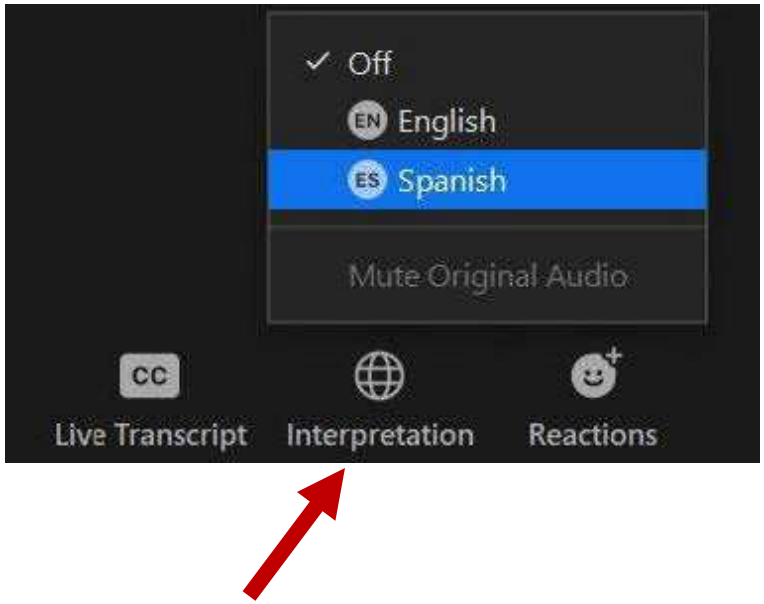
LS Power Grid California, LLC's
Collinsville 500/230 kilovolt Substation Project

APPLICATION NO. A2407018

January 21, 2025

Zoom Spanish Interpretation Option

- For Spanish / Para Espanol
  - Click the “interpretation” button and select your preferred language / Haga clic en el botón “Interpretation” y seleccione Español”
  - Click the Interpretation button again and then click “Mute Original Audio” / Haga clic en el botón “Interpretation” nuevamente y luego haga clic en “Silenciar audio original”



PANORAMA ENVIRONMENTAL, INC.

Meeting Overview

- Key Project Roles & the CPUC's Project Team
- Purpose of Scoping
- LSPGC's Application for a Certificate of Public Convenience and Necessity (CPCN)
- CPUC Project Review Process and Proceeding
- California Environmental Quality Act (CEQA)
  - Preparation of an Environmental Impact Report (EIR)
  - Environmental Review Topics and Analysis
- Proposed Project Overview
- Project Alternatives Screening and Analysis
- Opportunity for Comments

Key Project Roles

California Public Utilities Commission (CPUC)
Lead Agency under CEQA

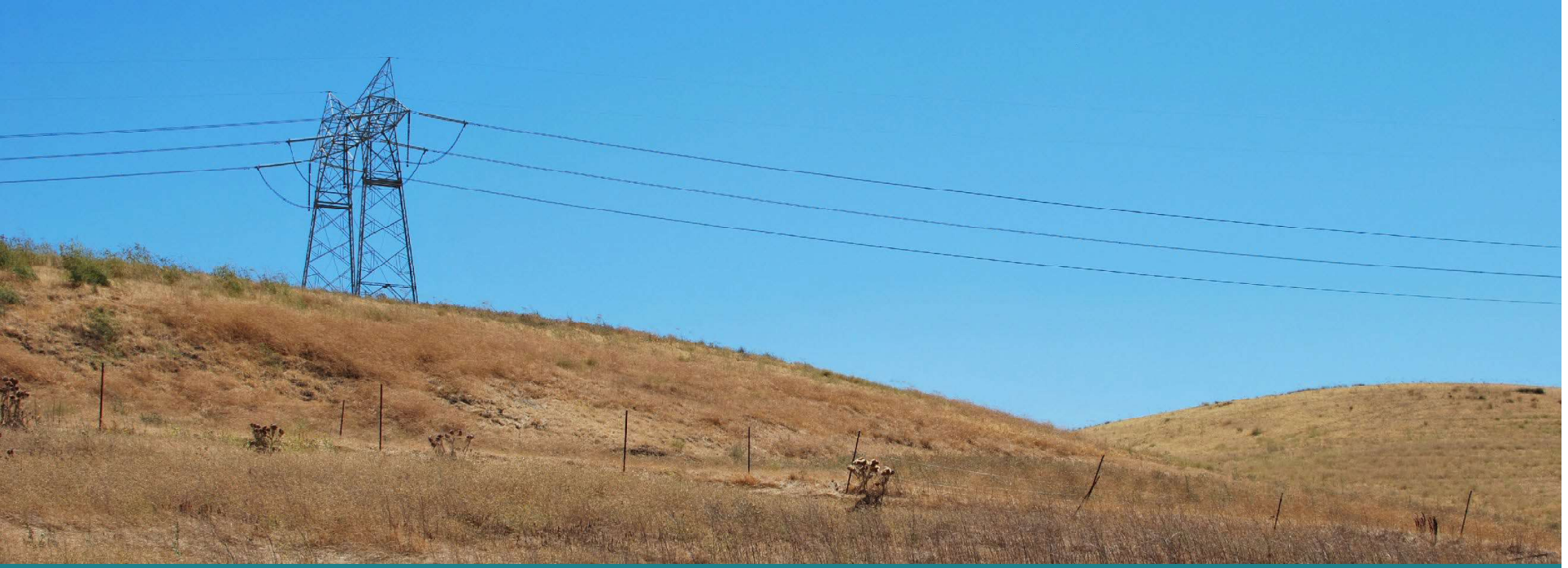
Panorama Environmental, Inc. (Panorama) & Subconsultants
CPUC's Third-Party Consultants

LS Power Grid California, LLC's (LSPGC)
Project Applicant

Pacific Gas and Electric Company (PG&E)
Project Participant

CPUC's Project Team

- CPUC Energy Division
  - Connie Chen, CPUC Project Manager
- CPUC's Third-Party Consultants
  - Panorama Environmental, Inc. (CEQA/EIR Preparation)
    - Susanne Heim, Project Director
    - Aaron Lui, Project Manager
    - Kate Thompson, Deputy Project Manager
  - Piñon Heritage Solutions LLC (Cultural/Tribal Resources)
  - Baseline Environmental Consulting (Noise and Air Quality)
  - Sequoia Ecological Consulting, Inc. (Terrestrial Biology)
  - Boudreau Associates LLC (Marine Biology)
  - Kevala Inc. (Transmission Planning)
  - The Sohagi Law Group, PLC (Legal Counsel)



CPUC Project Review Process and Proceeding

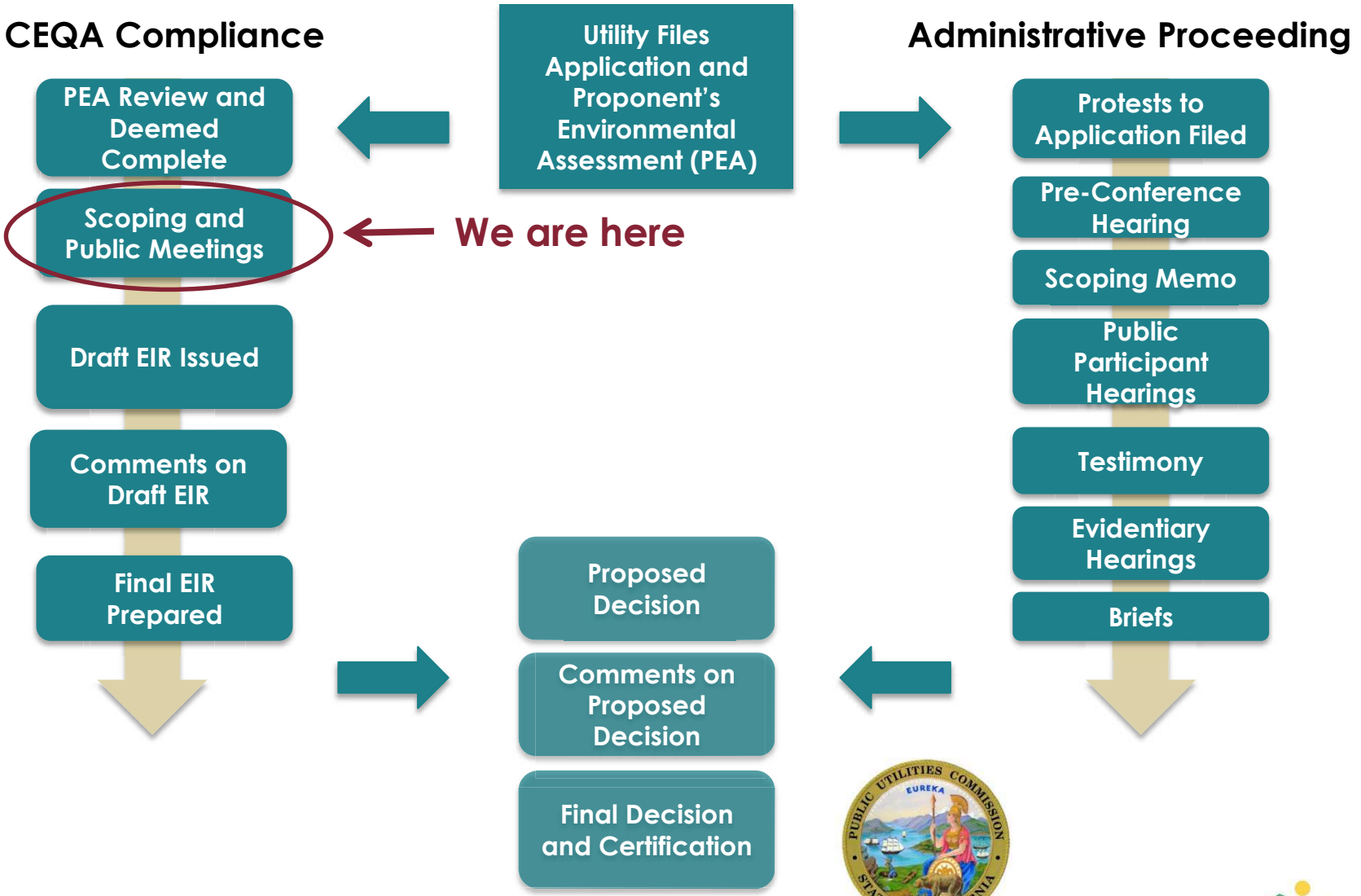
COLLINSVILLE SUBSTATION SCOPING MEETING

PANORAMA ENVIRONMENTAL, INC.

Purpose of Scoping

- Inform the public and responsible agencies about a project for which an EIR will be prepared
- Inform the public about the environmental review process
- Solicit input regarding:
  - Scope of issues to be addressed in the EIR
  - Potential alternatives to the proposed project
- Identify issues of concern and areas of potential controversy
- A Scoping Report will be prepared and published on the project website

CPUC Project Review Process per PRC Section 21000 et seq. CEQA and CEQA Guidelines



PANORAMA ENVIRONMENTAL, INC.

CPUC General Proceeding for a CPCN

- Application Proceeding (A2407018) led by:
  - Assigned Commissioner – Matthew Baker
  - Administrative Law Judge – Robert Haga
- Scope (defined by Public Utilities Code Section 1002)
  - Determine need for the project (facilities are necessary to promote the safety, health, comfort, and convenience of the public)
  - Consider community values, recreational and park areas, historic and aesthetic values
  - Influence on the environment
    - Review environmental impacts as required by CEQA

California Environmental Quality Act (CEQA)

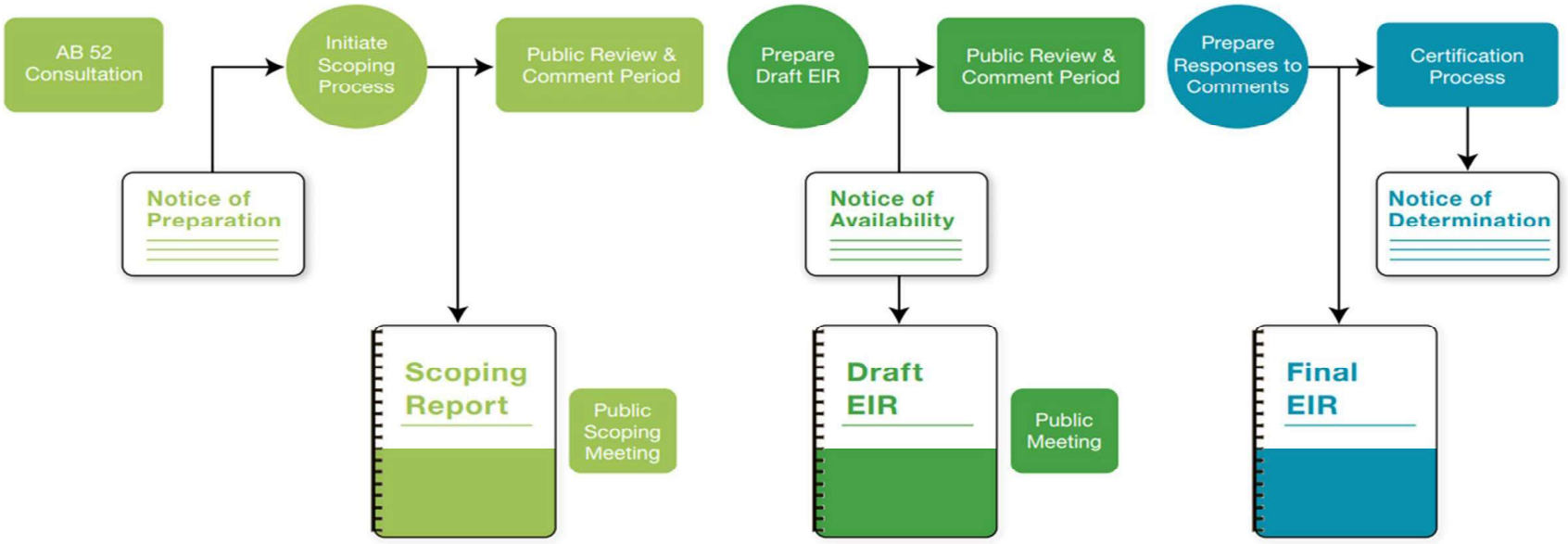
COLLINSVILLE SUBSTATION SCOPING MEETING

PANORAMA ENVIRONMENTAL, INC.

CEQA Overview

- California Environmental Quality Act (CEQA)
  - Inform decision makers and the public about the potential significant environmental effects of a proposed project
  - Identify ways that environmental damage can be avoided or reduced
  - Prevent significant, avoidable damage to the environment through alternatives or mitigation measures
  - Provide opportunities for public input
  - Disclose to the public the reasons why a governmental agency approved the project if significant environmental effects are involved
- Focus is on "physical impacts" – how a proposed project would alter physical conditions

CEQA EIR Process



Highlighted Steps	Description	Timeframe
Scoping Period	• Collect comments from the public	30 Days
Prepare Draft EIR	• Complete the analysis of environmental effects • Develop and analyze alternatives	~12 Months
Publish Draft EIR	• Public reviews the Draft EIR and provides comments • Additional public meeting	45 Days
Respond to Comments and Final EIR	• Respond to public comments on Draft EIR • Make any changes needed to the EIR	~3 Months

Proposed Project Overview

PANORAMA ENVIRONMENTAL, INC.

LSPGC's Project Components

- New Collinsville 500/230 kV Substation
  - 11-acre initial footprint
  - 4-acre potential future buildout
- New 230 kV Transmission Line
  - 6 miles total – Collinsville Substation to Pittsburg Substation
  - 1 mile overhead – Collinsville Substation to Delta
    - Installed on Tubular Steel Poles (TSPs)
  - 4.5 miles submarine – crossing the Delta
  - 0.5 mile underground – Delta to Pittsburg Substation
- New Telecommunication/Fiber Cables
  - Along the 230 kV transmission line
  - Pittsburg Substation to termination point 1 mile southeast

PG&E Interconnection Components

- New 500 kV Interconnection Loop
  - 1.2 miles – Vaca-Dixon Line to Collinsville Substation
  - 1.2 miles – Collinsville Substation to Vaca-Dixon Line
  - Installed on Lattice Steel Towers (LSTs)
- New communication yard with a microwave tower outside Collinsville Substation
- New 12 kV distribution extension to Collinsville Substation
- Modify existing Pittsburg, Vaca-Dixon, and Tesla Substations
- Modify or install four transposition structures along the Vaca-Dixon Line

Summary of LSPGC's Primary Project Objectives*

- Meet the California Independent System Operators' (CAISO) policy-driven need established for the project in their 2021-2022 Transmission Plan:
  - Address identified transmission constraints on the 230 kV system
  - Provide additional supply from the 500 kV system
- Improve and maintain the reliability of the transmission grid by addressing overloads
- Facilitate deliverability of load from existing and proposed renewable energy projects, and progress California's renewable energy goals
- Achieve commercial operation by June 2028

*Complete project objectives provided in PEA Section 2.1.1

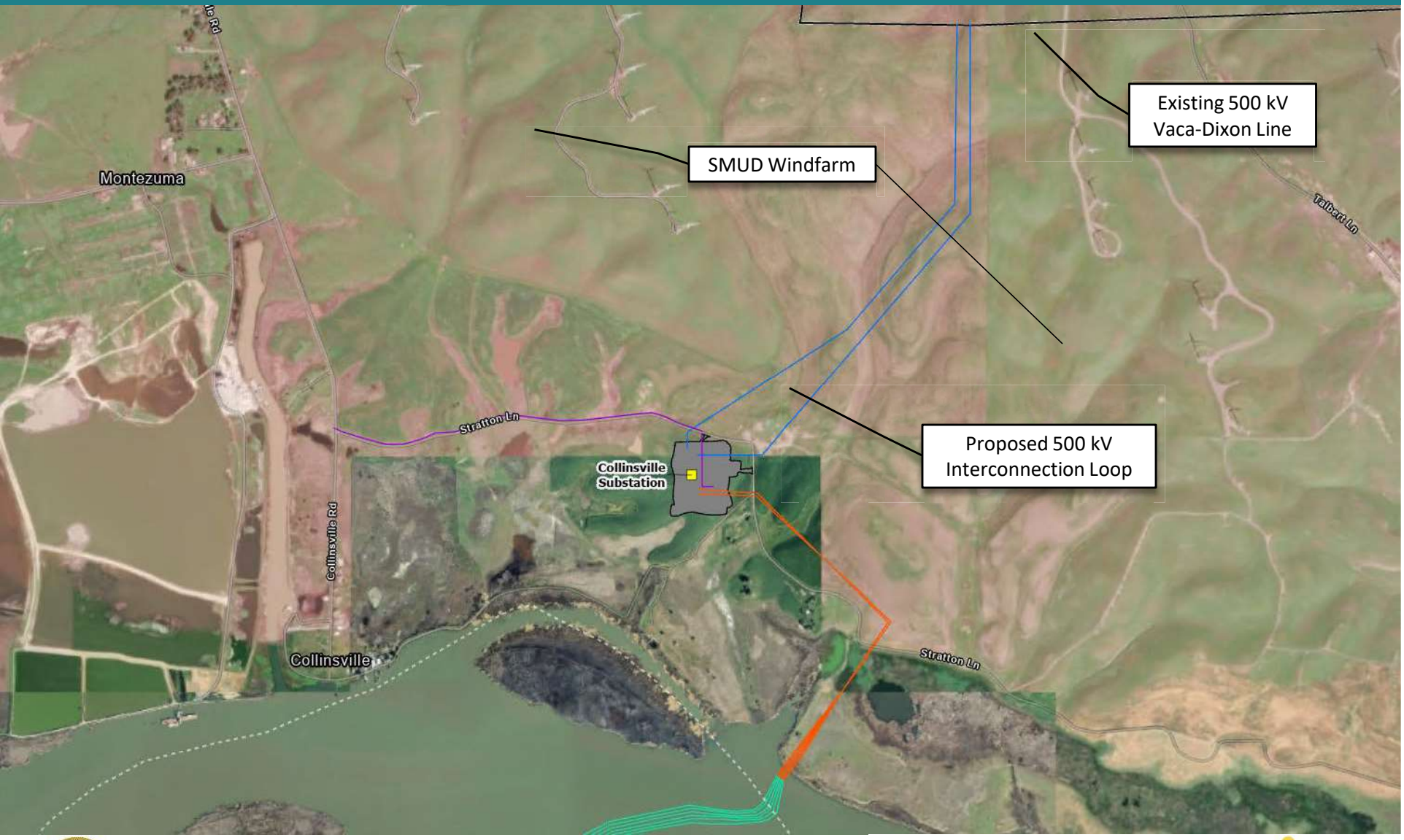
Proposed Project Location Overview

PANORAMA ENVIRONMENTAL, INC.

Proposed Project Layout

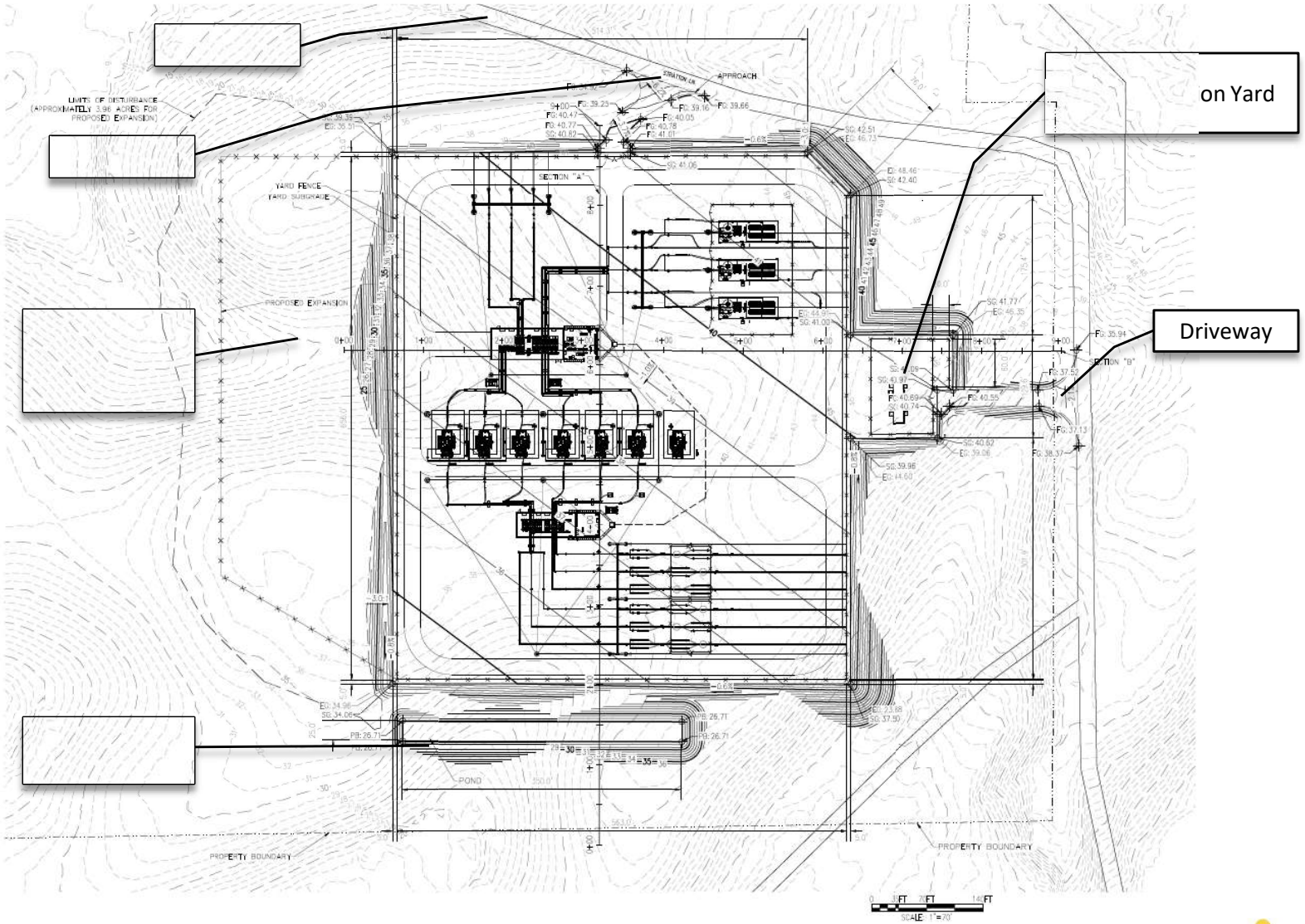
PANORAMA ENVIRONMENTAL, INC.

Proposed Project Layout – North of Delta

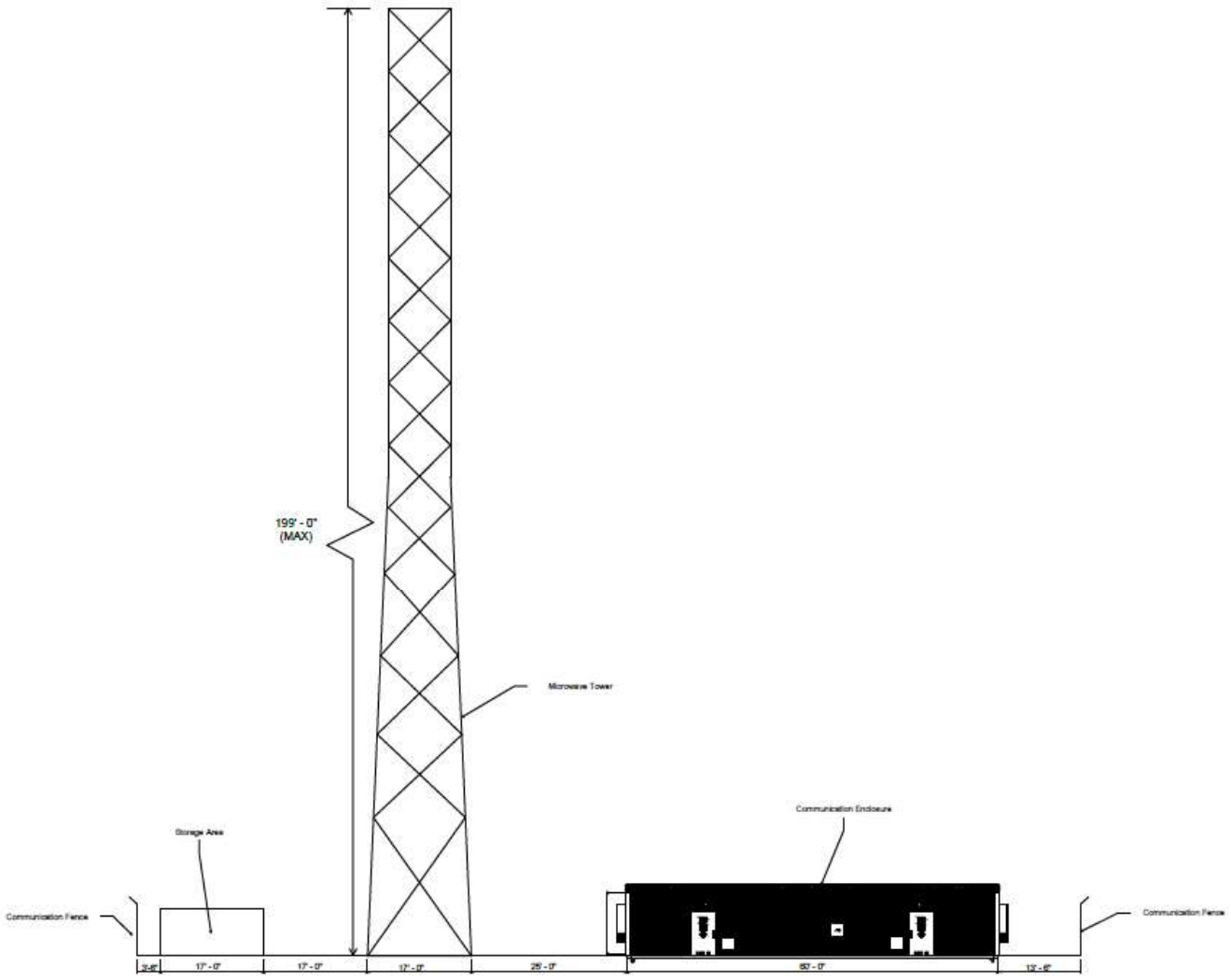


PANORAMA ENVIRONMENTAL, INC.

Proposed Collinsville Substation – Preliminary Grading Profile

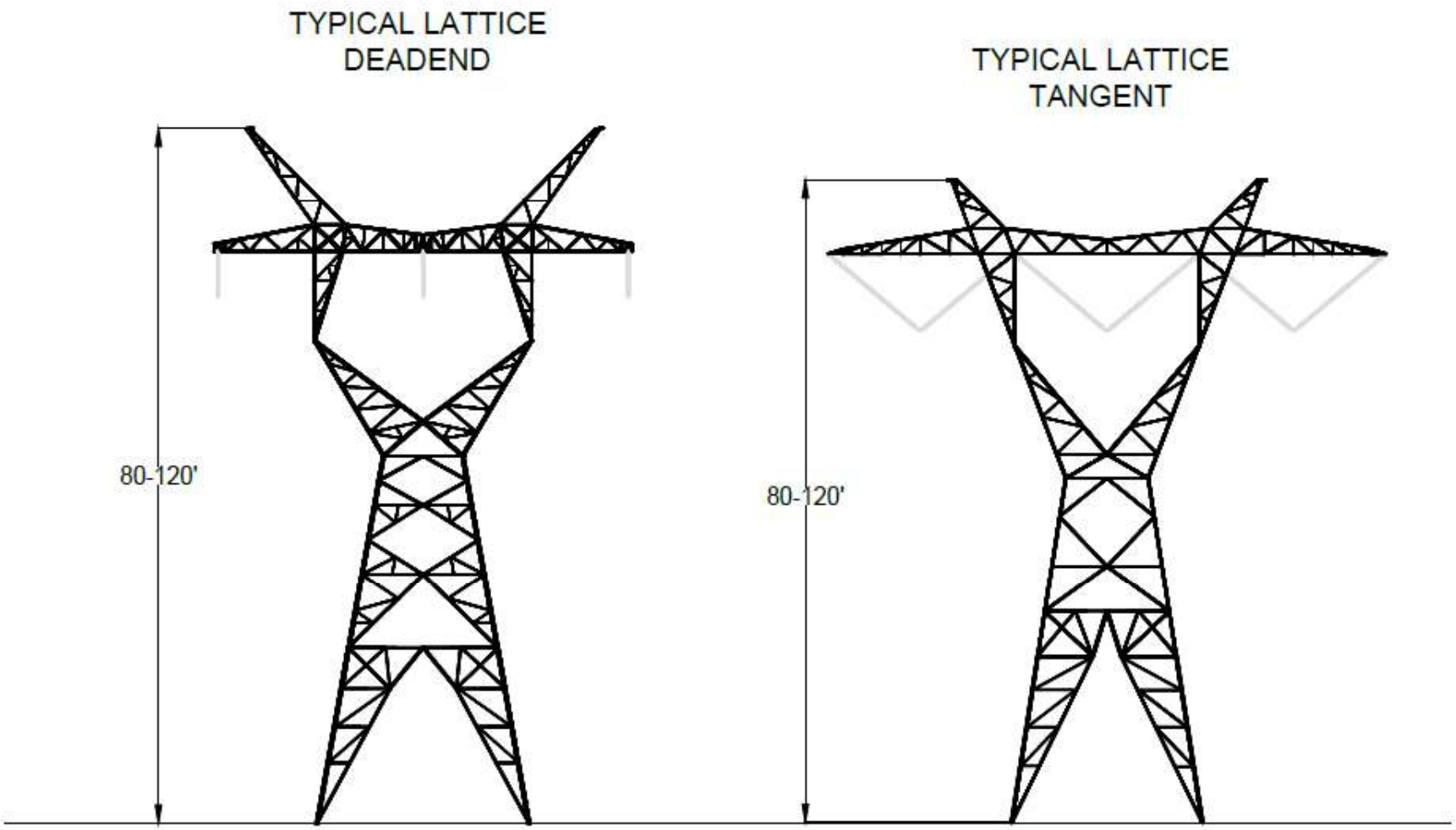


Proposed Communication Yard – Equipment Profile



PANORAMA ENVIRONMENTAL, INC.

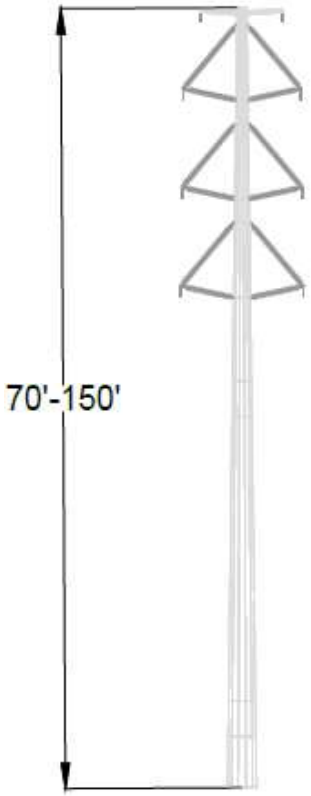
500 kV Line Interconnection Structures



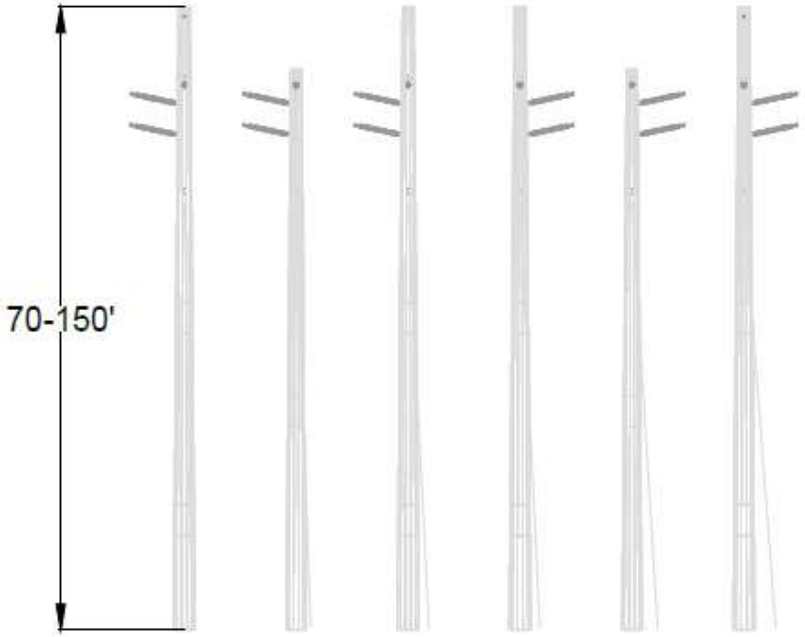
PANORAMA
ENVIRONMENTAL, INC.

230 kV Line Structures

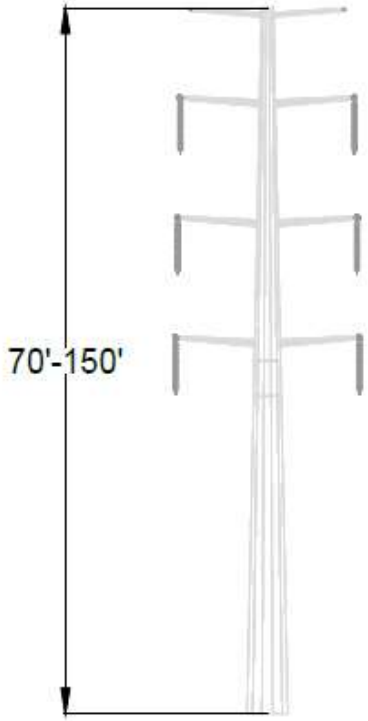
TYPICAL 230KV
TANGENT



TYPICAL 6-POLE
230kV DEADEND



TYPICAL 230kV
DEADEND



Proposed Substation – Existing View from Collinsville Road

PANORAMA ENVIRONMENTAL, INC.

Proposed Substation – Simulated View from Collinsville Road

PANORAMA ENVIRONMENTAL, INC.

Proposed Substation – Existing View from Stratton Lane

PANORAMA ENVIRONMENTAL, INC.

Proposed Substation – Simulated View from Stratton Lane

PANORAMA ENVIRONMENTAL, INC.

Proposed Project Layout – South of Delta

PANORAMA ENVIRONMENTAL, INC.

Construction Overview

- Proposed Schedule
  - LSPGC: May 2026 – November 2027
  - PG&E: May 2027 – May 2028
  - Testing and Commissioning: November 2027 – June 2028
  - Restoration: February – July 2028
  - Approximately 24 Months
- Typical Workdays
  - Terrestrial Work
    - 7 a.m. to 7 p.m., Monday through Saturday
    - Up to 30 days of nightwork during substation construction, or to respond to emergency situations
  - Submarine Work
    - Periodic work over 7 months (20 to 25 days for each cable)
    - 24/7 while cables are pulled (7 to 10 days for each cable)
- Daily Workforce
  - Maximum: 160 workers (during peak activities)
  - Average: 63 workers

Construction Overview – Continued

- Equipment
  - Various general construction and earth moving equipment
  - Helicopters used to facilitate transmission construction
  - Submarine cables installed using boats and a hydro plow within trenches (6-15 feet deep)
- Work Areas and Access
  - Temporary work areas and staging yards established to facilitate construction activities
  - Equipment access would occur along existing and temporary overland routes
  - No permanent access roads proposed
- Restoration
  - Following construction, all temporarily disturbed areas would be restored

Operation and Maintenance Overview

- Substation operated remotely
- Inspections and maintenance of facilities as required by state and federal regulations, including vegetation management requirements
- Local staff and contractors would conduct inspections and maintenance, and respond to any emergency situations

Environmental Impact Report

COLLINSVILLE SUBSTATION SCOPING MEETING

PANORAMA ENVIRONMENTAL, INC.

General EIR Contents and Purpose

- Contents
  - Describe the project and alternatives
  - Describe the environmental setting of the project area
  - Disclose the potential environmental impacts of the project and alternatives
  - Identify proposed measures to reduce or avoid potential environmental impacts (APMs and Construction Measures)
  - Identify additional measures required to reduce or avoid significant environmental impacts (mitigation measures)
- Purpose
  - Provide technically sound information for decision-makers to consider in evaluating the proposed project

Environmental Review Topics and EIR Sections

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Paleontological Resources
- Greenhouse Gas Emissions
- Hazards, Hazardous Materials, and Public Safety
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance
- Comparison of Alternatives
- Cumulative and Other CEQA Considerations

Analysis of Environmental Review Topics

- Define and Describe Existing Setting
  - Environmental Setting
  - Regulatory Setting
- Establish Thresholds of Significance
  - What defines a "significant" impact?
- Analyze Project Impacts and Mitigation
  - LSPGC's Applicant Proposed Measures (APMs)
  - PG&E's Construction Measures (CMs)
  - Mitigation Measures (MMs)
  - Identify impact significance after mitigation
- Evaluate cumulative impacts
- Evaluate and compare impacts of alternatives

Alternatives Screening Process

- Identify a range of reasonable alternatives to the Proposed Project, that:
  - Achieve main objectives
  - Reduce or avoid one or more significant environmental effect
- Alternative Considerations
  - Proposed Project design and location alternatives (e.g., alternative locations of the substation or interconnection lines)
  - Reconsideration of applicant alternatives identified in PEA
  - Alternatives developed by CPUC technical staff based on impact analysis
  - Alternatives suggested in scoping comments

Alternatives Screening Process – Continued

- Alternatives need to be feasible
  - Technical feasibility (can it be built?)
  - Regulatory feasibility (could it be permitted?)
  - Legal feasibility (would it be allowed under law?)
- "No Project Alternative"
  - Scenario where the Proposed Project is not built
  - Existing environmental conditions remain unchanged
  - Proposed Project objectives are not achieved

After EIR Completion

- Commission will vote on the project and either approve as proposed, approve an alternative, or deny
- EIR is referenced in the Decision
- If the Proposed Project or an alternative is approved, the Decision will require monitoring in accordance with Mitigation Monitoring and Compliance Reporting Procedures (MMCRP)

For Additional Information

- Visit the CPUC's project website: https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

Or

- Email us at: collinsville@panoramaenv.com

Website QR Code

Scoping Comments

PANORAMA ENVIRONMENTAL, INC.

Ways to Comment

- Provide written or oral comments tonight
- Submit comments after this meeting by mail or email

Mail	Email
Connie Chen (CPUC Project Manager) Collinsville Substation Project c/o Panorama Environmental, Inc 717 Market Street, Suite 400, San Francisco, CA 94103	collinsville@panoramaenv.com

- **Comments are due by 5:00 pm on February 6, 2025**

Effective Scoping Comments and Questions

Suggestions for providing effective comments:

- Specify potential impacts that you are concerned about
- Identify environmental resources of concern
- Suggest mitigation measures that could reduce or avoid impacts
- Suggest alternatives to the Proposed Project to reduce or avoid impacts

Questions?

- We will address process questions
- Project details and impact questions will be addressed in the EIR

Comment Guidelines

- To speak raise your hand:
  - Via Zoom App; or
  - Press *9 (if calling in via phone)
- Or put your comment in the Q&A chat dialogue
- Only speak when directed to by a meeting host
- Speak into your microphone and state your name (including spelling) and affiliation
  - Be concise (3 minutes or less)
  - Stay on topic
  - Respect others' opinions
  - Comments will be recorded
- Written comments via email are encouraged
  - collinsville@panoramaenv.com

Comment Session

Timer

00 : 03 : 00

Change Clock Type
Digital

Duration: 00 03 00

TimeUp Reminder (Optional): -- -- --

Choose Sound Effect Tick

Choose TimeUp Sound Alarm

Enable Count Up Combine With Bar Clock

Start Pause Stop Reset

Appendix D Scoping Comments

Gmail

Aaron Lui <aaron.lui@panoramaenv.com>

Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping for the Collinsville 500/230 Kilovolt Substation Project

Lamb, Steven@CVFPB <Steven.Lamb@cvflood.ca.gov> Fri, Jan 3, 2025 at 1:05 PM
To: Aaron Lui <aaron.lui@panoramaenv.com>
Cc: "Chen, Connie" <Connie.Chen@cpuc.ca.gov>, Susanne Heim <Susanne.Heim@panoramaenv.com>, Kate Thompson <kate.thompson@panoramaenv.com>

Aaron,

The project as presented is outside of a Board Adopted Plan of Flood Control and will not be subject to a permitting action through the Central Valley Flood Protection Board. Movement or alterations further east may be subject to Board permitting.

Steve Lamb, PE

Permitting Section Manager

Central Valley Flood Protection Board

(916) 820-7638 cell

steven.lamb@CVFlood.ca.gov

"Every Second Counts"

From: Aaron Lui <aaron.lui@panoramaenv.com>
Sent: Thursday, January 2, 2025 4:28 PM
Cc: Chen, Connie <Connie.Chen@cpuc.ca.gov>; Susanne Heim <Susanne.Heim@panoramaenv.com>; Kate Thompson <kate.thompson@panoramaenv.com>
Subject: Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping for the Collinsville 500/230 Kilovolt Substation Project

[Quoted text hidden]

Gmail

Aaron Lui <aaron.lui@panoramaenv.com>

Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping for the Collinsville 500/230 Kilovolt Substation Project

Townes, Daniel W CTR OSD OUSD A-S (USA) <daniel.w.townes.ctr@mail.mil> Mon, Jan 6, 2025 at 9:40 AM
To: "aaron.lui@panoramaenv.com" <aaron.lui@panoramaenv.com>

Good afternoon Mr. Lui,

My name is Dan Townes, Informal Review Manager, with the Department of Defense (DoD) Military Aviation and Installation Assurance Siting Clearinghouse.

The email below was sent to my Deputy Director, Ms. Robbin Beard. She stated that the email included attachments that did not come through.

If possible, can I send you a DoD Safe link (file sharing) for you to provide the attachments?

Please respond at your earliest convenience. Thank you.

Respectfully,

Dan Townes

Military Aviation and Installation Assurance Siting Clearinghouse

Office of the Assistant Secretary of Defense (Energy Resilience and Optimization)

Desk: 571-372-8414 (*temporarily unavailable*)

NIPR: daniel.w.townes.ctr@mail.mil

From: Aaron Lui <aaron.lui@panoramaenv.com>
Sent: Thursday, January 2, 2025 7:28 PM
Cc: Chen, Connie <Connie.Chen@cpuc.ca.gov>; Susanne Heim <Susanne.Heim@panoramaenv.com>; Kate Thompson <kate.thompson@panoramaenv.com>
Subject: Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping for the Collinsville 500/230 Kilovolt Substation Project

Agency Representative or Interested Party,

LS Power Grid California, LLC (LSPGC) filed an application for a Certificate of Public Convenience and Necessity (CPCN) (Application No. A.24-07-018) with the California Public Utilities Commission (CPUC) for the Collinsville 500/230 Kilovolt (kV) Substation Project, referred to as the Proposed Project. The CPUC, pursuant to the California Environmental Quality Act (CEQA), will prepare an Environmental Impact Report (EIR) to analyze environmental effects that would result from the Proposed Project if LSPGC's application is approved. The CPUC Project Manager is Connie Chen. Panorama Environmental, Inc. is the lead consultant supporting the CPUC to prepare the EIR.

A summary of the Proposed Project and maps are provided in the attached Notice of Preparation (NOP). A Google Earth KMZ file identifying the primary project feature locations is also attached. Additional information about the project is available on the CPUC's website: https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/index.html

A virtual public scoping meeting will be held on January 21, 2025, starting at 6:00 p.m. You are invited to attend the scoping meeting and to submit scoping comments through February 6, 2025. Refer to the attached NOP for information on how to attend the meeting and submit scoping comments.

Please respond to this message if you have any questions about the project or would like to request a focused meeting with the CPUC project team.

Thank you,

Aaron Lui, Senior Manager
Panorama Environmental, Inc.
717 Market Street, Suite 400
San Francisco, CA 94103
o.650.340.4836 | **c.**916.719.0094

Gmail

Aaron Lui <aaron.lui@panoramaenv.com>

Comments on NOP on EIR for Collinsville 500/230 kilvolt Substation Project

Richard Muzzy <RMuzzy@airquality.org> Mon, Jan 13, 2025 at 3:35 PM
To: "collinsville@panoramaenv.com" <collinsville@panoramaenv.com>

To Whom it May Concern,

The Sac Metro Air District has no comments on the NOP for the EIR for the Collinsville 500/230 Kilvolt Substation Project.

Thank you for providing us the opportunity for our agency to provide comments and please let us know when the Draft EIR is released for comment.

Thanks,

Rich

Rich Muzzy

Associate Air Quality Planner/Analyst

Transportation & Climate Change Division - CEQA & Land Use

Desk: (279) 207-1139

Website: www.AirQuality.org

@AQMD

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

Gmail

Aaron Lui <aaron.lui@panoramaenv.com>

Collinsville 500/230 Kilovolt (kV) Substation Project

Avina, Mike@DPC <Mike.Avina@delta.ca.gov> Mon, Jan 13, 2025 at 1:46 PM
To: "collinsville@panoramaenv.com" <collinsville@panoramaenv.com>
Cc: "Blodgett, Bruce@DPC" <Bruce.Blodgett@delta.ca.gov>, "Gardiner, Virginia@DPC" <Virginia.Gardiner@delta.ca.gov>

Dear Ms. Chen:

We are submitting comments on the Collinsville 500/230 Kilovolt (kV) Substation Project, referred to as the Proposed Project. We understand you are conducting scoping for the project. Staff has reviewed the project and have the following comments. The Delta Protection Commission (Commission) is a California State agency created by the Delta Protection Act of 1992, which declared *"the Delta is a natural resource of statewide, national, and international significance, containing irreplaceable resources, and it is the policy of the state to recognize, preserve and protect those resources of the Delta for the use and enjoyment of current and future generations"* (California Public Resources Code Section 29701). Our mission includes, but is not lmited to, protecting agricultural and natural land uses in the Primary Zone of the Delta. We also may comment on land uses in the Secondary Zone to the extent they may impact the Primary Zone. Our comments have not been reviewed by the Commission itself thus please note our comments reflect only the views of staff.

- Concerns regarding navigation: Based on your project description the portions of the cable that occur in water will be buried. In addition, we assume you are coordinating with and obtaining appropriate approvals or permits from the State Lands Commission ("State Lands") and the US Army Corps of Engineers (USACE) as relevant. For example, a permit under Section 10 of the Rivers and Harbors Act of 1899 may be required. Because the cable will be buried and because we assume you are coordinating with State Lands and USACE, we assume any risk to navigation will be addressed.
- Concerns regarding new powerlines in upland areas: the project appears to propose new power lines in upland areas. If the land under and near the lines are subject to changes in land use such as new restrictions on what land uses may occur, we encourage you to allow agricultural land uses to continue. If agricultural land uses cannot continue, we encourage you to adopt appropriate mitigation to preserve equivalent or greater acreage of land than the land that is lost. While the upland areas where the project will occur are in the Secondary Zone, agricultural land uses in those areas support the overall sustainability of Delta agriculture.

If you have any questions, feel free to contact the Delta Protection Commission staff.

Mike Aviña

Senior Environmental Planner
Delta
Protection Commission – a California state agency
Mobile: (530) 750-6727
Follow us on Facebook | Instagram | LinkedIn | Twitter/X | Threads

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

January 14, 2025

Connie Chen
California Public Utilities Commission
505 Van Ness Avenue
San Francisco CA 94102

Re: 2025010149 Collinsville 500/230 Kilovolt Substation Project, Solano, Contra Costa, Alameda, Sacramento Counties

Dear Ms. Chen:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

a. A brief description of the project.

b. The lead agency contact information.

c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).

d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.

b. Recommended mitigation measures.

c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

a. Type of environmental review necessary.

b. Significance of the tribal cultural resources.

c. Significance of the project's impacts on tribal cultural resources.

d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.

b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:

a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.

b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.

c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Mathew.Lin@NAHC.ca.gov.

Sincerely,

Mathew Lin

Mathew Lin
Cultural Resources Analyst

cc: State Clearinghouse

CALIFORNIA STATE LANDS COMMISSION
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

GRACE KATO, *Acting Executive Officer*
916.574.1800
TTY CA Relay Service: **711** *or Phone* **800.735.2922**
from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

Contact Phone: 916.574.1900

February 6, 2025

File Ref: SCH # 2025010149

Connie Chen
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94103

VIA REGULAR & ELECTRONIC MAIL (collinsville@panoramaenv.com; connie.chen@cpuc.ca.gov)

Subject: Notice of Preparation for an Environmental Impact Report for the Collinsville 500/230 Kilovolt Substation Project, Solano, Contra Costa, Alameda, and Sacramento Counties

Dear Connie Chen:

The California State Lands Commission (Commission) staff has reviewed the subject Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the Collinsville 500/230 Kilovolt (kV) Substation Project (Project), which is being prepared by the California Public Utilities Commission (CPUC). The CPUC is the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign lands and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on State sovereign land under the Commission's jurisdiction, the Commission will act as a responsible agency. Commission staff requests that CPUC consult with us on preparation of the Draft EIR as required by CEQA section 21104, subdivision (a), and the State CEQA Guidelines section 15086, subdivisions (a)(1) and (a)(2).

Commission Jurisdiction and Public Trust Lands

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub.

Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the state for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line (MHTL), except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court. Such boundaries may not be readily apparent from present day site inspections.

Based on staff's review of the submitted information and internal records, the proposed Project will be located within State sovereign land granted by the legislature to the City of Pittsburg pursuant to Chapter 422, Statutes of 2011, with minerals reserved. The Project will also be located within ungranted State sovereign land in the Sacramento River (also known as Suisun Bay on the 1980 U.S. Geological Survey Honker Bay and Antioch North maps), which at this location is natural, navigable, and tidal. The ungranted State sovereign land falls under the jurisdiction of the Commission and is subject to leasing requirements.

An application for the Project may be submitted to the Commission through the online application portal (OSCAR.slc.ca.gov). If you have questions specific to jurisdiction, lease provisions, or the application process, please see the Public Land Manager contact information at the end of the letter.

Potential Land Use Conflicts

The proposed Project passes through State sovereign lands authorized by Commission-issued Lease 7781 for the extraction of sand and gravel for commercial use. It is likely that the proposed transmission line's path within the river intersects multiple portions of the Lease 7781 area to the southwest of Chain Island and to the west of the northern half of Winter Island (see further discussion below). While the Commission seeks to lease public lands under a doctrine of non-exclusivity, staff also seek to ensure that competing uses of these lands do not directly conflict. Therefore, Commission staff request that the proposed Project be designed to minimize or eliminate such conflict. Staff is processing an application for a new 10-year lease for 7781, set for Commission consideration in late 2025 or early 2026, pending completion of a Supplemental EIR for the San Francisco Bay and Delta Sand Mining Project. Commission staff recommend that the CPUC review the Commission's Notice of Preparation, released on May 25,

2023, for the Supplemental EIR for the San Francisco Bay and Delta Sand Mining Project, which includes Lease 7781, and reach out to staff for further information about the application.

Project Description

LS Power Grid California (LSPGC) filed an application for a Certificate of Public Convenience and Necessity with the CPUC for the Project. The California Independent System Operator's 2021-2022 Transmission Plan identified the proposed Project as a needed upgrade to the California electric grid. The proposed Project is located in Solano, Sacramento, Alameda, and Contra Costa counties within an existing regional transmission system that provides electricity to the northern Greater Bay Area.

From the Project Description, Commission staff understands that the Project would include the following components that have potential to affect State sovereign land:

- Transmission Line and Transition Structure: Construction of a new approximately 6-mile long, double-circuit 230 kV transmission line that would include approximately 4.5 miles of submarine cables running beneath the Sacramento River. The submarine cables would be buried to a depth of approximately 6 to 15 feet below the sediment surface, and would connect to an in-river transition structure just off the northern shore of the Sacramento River.
- Underground Utility Vault: The in-river transmission line segment would connect to the utility vault located on the southern shore of the Sacramento River, near the Pittsburg Substation.

Environmental Review

Commission staff requests that the CPUC consider the following comments when preparing the EIR, to ensure that impacts to State sovereign land are adequately analyzed for the Commission's use of the EIR to support a future lease approval for the Project.

General Comments

1. Project Description: A thorough and complete Project Description should be included in the EIR to facilitate meaningful environmental review of potential impacts, mitigation measures, and alternatives. The Project Description should be as precise as possible in describing the details of all proposed activities (e.g., types of equipment and construction methods that may be used, maximum area of impact or volume of sediment removed or disturbed, seasonal work windows, locations for material disposal, etc.), as well as the

details of the timing and length of activities. In particular, illustrate on figures and engineering plans the MHTL of the Sacramento River and provide written description of activities occurring below the MHTL. Thorough descriptions will facilitate Commission staff's determination of the extent and locations of its leasing jurisdiction, make for a more robust analysis of the work that may be performed, and minimize the potential for subsequent environmental analysis to be required.

2. Cumulative Impacts: In accordance with Section 15130 of the CEQA Guidelines, the EIR should include an analysis of how the Project could contribute incremental effects that could be cumulatively considerable or conflict with past, present, or probable future projects occurring in the Project area. As explained in the Potential Land Use Conflicts section of this letter, it is likely that the proposed transmission line's path within the river intersects multiple portions of the lease area for Lease 7781 to the southwest of Chain Island and to the west of the northern half of Winter Island. The proposed burial depth of the transmission line of 6 to15 feet into the substrate could interfere with sand mining operations and could result in damage to the proposed transmission line because of sand mining operations directly above it. Further, natural fluctuations in the thickness of the substrate would occur over time due to subsurface currents, which could expose portions of the buried transmission line if the depth is not sufficient and exacerbated by sand mining operations.

   To mitigate this risk, the path of the transmission line may require some adjustments in trend and depth, particularly for the segments that intersect the sand mining lease area. Commission staff recommends that the CPUC and the LSPGC evaluate the proposed Project's design, considering the sand mining operations of Lease 7781 and the proposed activities evaluated in the Supplemental EIR, to ensure that conflicts are minimized. In addition, the CPUC and LSPGC should ensure that the EIR adequately analyzes cumulative impacts and identifies appropriate mitigation or alternatives.

   Additionally, the U.S. Army Corps of Engineers (USACE) conducts maintenance dredging of the federal navigation ship channel in the Sacramento River, which is within a portion of the Project area. Therefore, the CPUC and LSPGC should consult with USACE to ensure the proposed submarine cables are aligned and sited at an appropriate depth of burial for compatibility with USACE maintenance dredging operations, and these operations should be evaluated as part of the cumulative impacts analysis.

3. Proposed Project and Alternatives Analysis: In addition to describing mitigation measures that would avoid or reduce the potentially significant impacts of the Project, the CPUC should identify and analyze a range of

reasonable alternatives to the proposed Project that would attain most of the Project objectives while avoiding or reducing one or more of the potentially significant impacts (see State CEQA Guidelines, § 15126.6).

As explained in the Commission Jurisdiction section and comment #2 (Cumulative Impacts), above, the route and proposed depth of burial of the in-river submarine cables with the proposed Project has potential to conflict with existing uses in the Project area. To maximize compatibility with existing uses, the CPUC and LSPGC should consider development of a Project alternative that uses Horizontal Directional Drilling (HDD) methods to increase the buried cable depth of cover. The HDD method could ensure the safety and integrity of the buried cables.

Biological Resources

4. For land under the Commission's jurisdiction, the EIR should disclose and analyze all potentially significant effects on sensitive species and habitats in and around the Project area, including special status wildlife, fish, and plants, and if appropriate, identify feasible mitigation measures to reduce those impacts. The CPUC should conduct queries of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database and U.S. Fish and Wildlife Service's (USFWS) Special Status Species Database to identify any special status plant or wildlife species that may occur in the Project area. The EIR should also include a discussion of consultation with CDFW, USFWS, and the National Marine Fisheries Service (NMFS), as applicable, including any recommended mitigation measures and potentially required permits identified by these agencies.

5. Invasive Species: One of the major stressors in California waterways is introduced species. Therefore, the EIR should consider the Project's potential to encourage the establishment or proliferation of aquatic invasive species (AIS) such as the Golden mussel (*Limnoperna fortunei*) and other nonindigenous, invasive species including aquatic plants, snails, and clams. For example, construction boats and barges may transport new species to the Project area via vessel biofouling, wherein marine and aquatic organisms attach to and accumulate on the hull and other submerged parts of a vessel.

   If the analysis in the EIR finds potentially significant AIS impacts, possible mitigation could include requiring contractors to inspect and clean the hull and other underwater surfaces of vessels prior to arrival at the Project site. The Commission's Marine Invasive Species Program could assist with this analysis as well as with the development of appropriate mitigation measures (information at https://www.slc.ca.gov/misp/).

6. Construction Noise: The EIR should also evaluate noise and vibration impacts on fish and birds from construction activities in the water, on the levees, and for land-side supporting structures. Mitigation measures could include species-specific work windows as defined by CDFW, USFWS, and NMFS. Again, staff recommends early consultation with these agencies to minimize the impacts of the Project on sensitive species.

Climate Change

7. Sea Level Rise: Climate change impacts, including sea level rise, more frequent and intense storm events, and increased flooding and erosion, affect both open coastal areas and inland waterways in California. The facilities are located on the Sacramento River, in a tidally influenced site vulnerable to flooding at current sea levels and at a higher risk of flood exposure given projected scenarios of sea level rise.

   The 4.5 miles of submarine cables proposed to be buried to a depth of approximately 6 to 15 feet below the riverbed should have adequate protection from the effects of climate change, but may require periodic inspection to ensure the cables do not become exposed from erosion and scouring processes. However, structures proposed along the riverbank (i.e., in-river transition structure just off the northern shore of the Sacramento River and underground utility vault on the southern shore of the Sacramento River) are fixed and therefore more vulnerable to sea level rise and more frequent flood events. These structures may need maintenance, due to increased flood exposure and more frequent storm events, to ensure they do not become dislodged or degraded and to reduce risks to public safety and navigation.

   The EIR should address how the riverbank structures have been designed to withstand flood events and the effects of climate change. A lease application with the Commission will require an analysis of the effects of climate change on structures proposed within the lease premises.

Cultural Resources

8. Submerged Resources: The EIR should evaluate potential impacts to submerged cultural resources in the Project area. The Commission maintains a shipwrecks database that can assist with this analysis. Please send inquiries to Shipwreck.Database@slc.ca.gov to obtain shipwrecks data from the database and Commission records for the Project site. The database includes known and potential vessels located on the State's tide and submerged lands; however, the locations of many shipwrecks remain unknown. Please note that any submerged archaeological site or submerged historic resource that has remained in state waters for more than

50 years is presumed to be significant. Because of this possibility, please add a mitigation measure requiring that in the event cultural resources are discovered during any construction activities, Project personnel shall halt all activities in the immediate area and notify a qualified archaeologist to determine the appropriate course of action.

9. Title to Resources: The EIR should also mention that the title to all abandoned shipwrecks, archaeological sites, and historic or cultural resources on or in the tide and submerged lands of California is vested in the State and under the jurisdiction of the California State Lands Commission (Pub. Resources Code, § 6313). In addition, Commission staff requests that the following statement be included in the EIR's Mitigation and Monitoring Plan: "The final disposition of archaeological, historical, and paleontological resources recovered on state lands under the jurisdiction of the California State Lands Commission must be approved by the California State Lands Commission."

Mitigation

10. Deferred Mitigation: In order to avoid the improper deferral of mitigation, mitigation measures must be specific, feasible, and fully enforceable to minimize significant adverse impacts from a project, and "shall not be deferred until some future time." (State CEQA Guidelines, §15126.4, subd. (a)). For example, references to the preparation of a Mitigation Plan to reduce an impact, without calling out the specific activities that will be included in the Plan to reduce that particular impact to a less than significant level, is considered deferral. Commission staff requests that specific information be provided in such mitigation measures to demonstrate how the measure is going to mitigate potential significant impacts to less than significant.

Environmental Justice

11. Environmental justice is defined by California law as "the fair treatment and meaningful involvement of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." (Gov. Code § 65040.12) This definition is consistent with the Public Trust Doctrine's principle that management of trust lands is for the benefit of all people.

    The Commission adopted an updated Environmental Justice Policy and Implementation Blueprint in December 2018 to ensure that environmental justice is an essential consideration in the agency's processes, decisions, and programs. The twelve goals outlined in the Policy reflect an urgent need to address the inequities of the past, so they do not continue. Through its policy,

the Commission reaffirms its commitment to an informed and open process in which all people are treated equitably and with dignity, and in which its decisions are tempered by environmental justice considerations.

Although not legally required in a CEQA document, Commission staff suggests that the CPUC include a section describing the environmental justice community outreach and engagement undertaken in developing the EIR and the results of such outreach. The California Office of Environmental Health Hazard Assessment developed the CalEnviroScreen mapping tool to assist agencies with locating census tracts near proposed projects and identifying the environmental burdens, should there be any, that disproportionately impact those communities. Environmental justice communities often lack access to the decision-making process and experience barriers to becoming involved in that process. It is crucial that these communities are consulted as early as possible in the project planning process.

Commission staff strongly recommends using the CalEnviroScreen tool and then, as applicable, reaching out through local community organizations, such as the California Environmental Justice Alliance. For projects in the San Francisco Bay Conservation and Development Commission's (BCDC) jurisdiction and the Delta, Commission staff also recommends using the BCDC Community Vulnerability Tool and the Vulnerability to Climate Change in the Delta map developed by the Delta Stewardship Council. Engaging in early outreach will facilitate more equitable access for all community members. In this manner, the CEQA public comment process can improve and provide an opportunity for more members of the public to provide input related to environmental justice. Commission staff also recommends incorporating or addressing opportunities for community engagement in mitigation measures. Commission staff will review the environmental justice outreach and associated results as part of any future Commission action.

Thank you for the opportunity to comment on the NOP for the Project. As a trustee and responsible agency, Commission staff requests consultation on this Project and to be kept advised of changes to the Project Description and all other important developments. Please send additional information on the Project to the Commission staff listed below as the EIR is being prepared.

Please refer questions concerning environmental review to Jason Ramos, Senior Environmental Scientist, at (916) 574-1814 or via email at Jason.Ramos@slc.ca.gov. For questions concerning Commission leasing jurisdiction, please contact Joanne Holt, Public Land Management Specialist, at (916) 574-1832 or via email at Joanne.Holt@slc.ca.gov.

Sincerely,

Nicole Dobroski, Chief
Division of Environmental Science,
Planning, and Management

cc: Office of Planning and Research
J. Holt, Commission
J. Ramos, Commission
C. Huitt, Commission
J. Fabel, Commission
P. Regan, Commission
V. Perez, Commission
R. Lee, Commission

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

February 5, 2025

SCH #: 2025010149
GTS #: 04-MULTIPLE-2025-00421
GTS ID: 35214
Co/Rt/Pm: CC/4/24.555

Connie Chen, Public Utilities Regulatory Analyst
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Collinsville 500/230 Kilovolt Substation Project - Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)

Dear Connie Chen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Collinsville 500/230 Kilovolt Substation Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the January 2025 NOP.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding
The proposed project involves several components to upgrade the electric grid, including construction of a new 500/230 kilovolt substation ("Collinsville Substation") and appropriate connections to existing facilities. These connections include several miles of new transmission lines, included 4.5 miles of submarine cables, new telecommunications paths collocated with the new transmission lines, a new microwave tower, and a new fiber optic path.

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans'

Transportation Impact Study Guide (*link*). Caltrans looks forward to reviewing the VMT analysis in the DEIR when it is available.

Climate Change
Please keep Caltrans informed about the various climate stressors and ongoing adaptation and resilience initiatives as they are developed and implemented at this project location. Caltrans is interested in engaging in multi-agency and regional collaboration, to find multi-benefit solutions that protect vulnerable shorelines, communities, infrastructure, and the environment. Consider aligning any potential shoreline adaptation with countywide efforts (Contra Costa Resilient Shoreline Plan) on climate adaptation and vulnerability.

Caltrans actively collaborates with regional partners to address climate vulnerabilities and would like to remain updated on any potential adaptation measures or initiatives at this location and will greatly appreciate being included in ongoing local efforts as this project develops. Caltrans prioritizes working with regional and local partners to strategize and adopt effective adaptation measures for the transportation system in the area. For any questions or concerns, please feel free to contact the Caltrans Bay Area Climate Change Planning Coordinators at D4_ClimateResilience@dot.ca.gov.

Construction-Related Impacts
Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (*link*). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mary McGee, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (link) or contact LDR-D4@dot.ca.gov.

Sincerely,

Marley Mathews

MARLEY MATHEWS
Acting Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

SOLANO COUNTY WATER AGENCY

February 5, 2025

Connie Chen (CPUC Project Manager)
Collinsville Substation Project
c/o Panorama Environmental, Inc.
717 Market Street, Suite 400, San Francisco, CA 94103

Subject: Collinsville Substation Project

Dear Ms. Chen,

Thank you for the opportunity to provide comments and suggestions for the Notice of Preparation (NOP) for the Collinsville 500/230 Kilovolt Substation Project.

Solano County Water Agency (the Water Agency) provides wholesale water supply to cities, special districts, and State agencies in Solano County. Our agency boundary encompasses all of Solano County including portions of the legal Delta.

In reviewing the NOP, attending the Scoping Meeting on January 21, 2025, and discussing with staff, the Water Agency has determined that, based on the information provided to date, there is no observed potential impact to our facilities from the proposed line work, substation construction, or in-river transition structure.

We will continue to monitor project updates as the project moves forward with the Draft Environmental Impact Report.

If you have any questions, please don't hesitate to contact me at (707) 455-1106 or by e-mail at DBarr@scwa2.com.

Sincerely,

Deborah L. Barr, PE
Manager of Engineering

CC: Alex Rabidoux, SCWA

810 Vaca Valley Parkway, Suite 202 • Vacaville, CA 95688
Phone (707) 451-6090 • Fax (707) 451-6099

SOLANO WATER
• WASTE NOT • WANT NOT •

Holland & Knight

560 Mission Street, Suite 1900 | San Francisco, CA 94105 | T 415.743.6900 | F 415.743.6910
Holland & Knight LLP | www.hklaw.com

Jennifer Hernandez
+1 415-743-6972
jennifer.hernandez@hklaw.com

February 6, 2025

VIA EMAIL & CERTIFIED MAIL RETURN RECEIPT REQUESTED

Connie Chen (CPUC Project Manager)
Collinsville Substation Project
c/o Panorama Environmental, Inc
717 Market Street, Suite 400,
San Francisco, CA 94103
collinsville@panoramaenv.com

LS Power Grid California, LLC
16150 Main Circle Drive, Suite 310
Chesterfield, MO 63017

Re: Scoping Comments on Draft Environmental Impact Report for Collinsville 500/230 kV Substation Project

On behalf of California Forever LP ("California Forever"), Holland & Knight, LLP hereby submits the following scoping comments on the forthcoming Draft Environmental Impact Report ("EIR") for the Collinsville 500/230 kV Substation Project (the "Project"), Application No. A.24-07-018, proposed by LS Power Grid California, LLC ("LS Power").

I. Background

California Forever is in the process of planning a new development on tens of thousands of acres of land in southeastern Solano County, including a new sustainable, walkable community, advanced manufacturing, and a series of new solar farms. The California Forever project promises to address three of California's greatest challenges: increasing local jobs, creating new homeownership opportunities (including affordable housing), and providing clean, affordable sources of renewable energy.

LS Power has applied to the California Public Utilities Commission ("CPUC") for a Certificate of Public Convenience and Necessity ("CPCN") to construct and operate the Project. The CPUC, as lead agency under the California Environmental Quality Act ("CEQA") has issued a Notice of Preparation ("NOP"), which calls for scoping comments on the forthcoming EIR.

As discussed in the NOP, the Project is proposed to be located to the southwest of Stratton Lane and approximately 0.75-mile northeast of the unincorporated community of Collinsville. Among other components, the Project will include (i) 2.4 miles of new 500 kV transmission lines between the new substation and Pacific Gas and Electric Company's ("PG&E") existing Vaca Dixon-Tesla 500 kV Transmission Line; (ii) an approximately 6-mile-long 230 kV transmission line to connect the substation to PG&E's existing Pittsburg Substation (including approximately 4.5 miles of submarine cables running beneath the Sacramento-San Joaquin River Delta waterways); and (iv) an extension to an existing PG&E 12 kV distribution line by 0.9 miles to the proposed substation.

The purpose of these scoping comments is to (i) ensure to Draft EIR includes a finite, stable and accurate project description that reflects reasonably foreseeable transmission upgrades associated with the proposed Collinsville Substation, (ii) admonish LS Power that the CPUC will engage in improper piecemealed environmental review if the Draft EIR excludes the proposed 260 mile high-voltage direct current ("HVDC") line that will connect the substation to the proposed Humboldt 500 kV Substation, and (iii) to recommend that the Draft EIR cover certain environmental impacts associated with a project of this size, magnitude and location.

II. The "Project" Analyzed in the EIR Must Include Transmission Lines Between the Proposed Humboldt and Collinsville Substations

The Project was first identified in the California Independent System Operator's ("CAISO") *2021-2022 Transmission Plan* as a policy-driven project to alleviate transmission capacity constraints. According to the Project's Notice of Preparation ("NOP"), the Project will interconnect to PG&E's Vaca-Dixon Substation (to the North) and PG&E's Pittsburg Substation (to the South, across the Bay Delta). Both the CAISO 2021-2022 Transmission Plan and the Project's NOP contemplate the same suite of transmission upgrades.

However, CAISO's *2023-2024 Transmission Plan* paints a different picture.[1] The latest Transmission Plan identifies policy-driven transmission upgrade projects needed to accommodate future offshore wind development in Humboldt Bay, including:

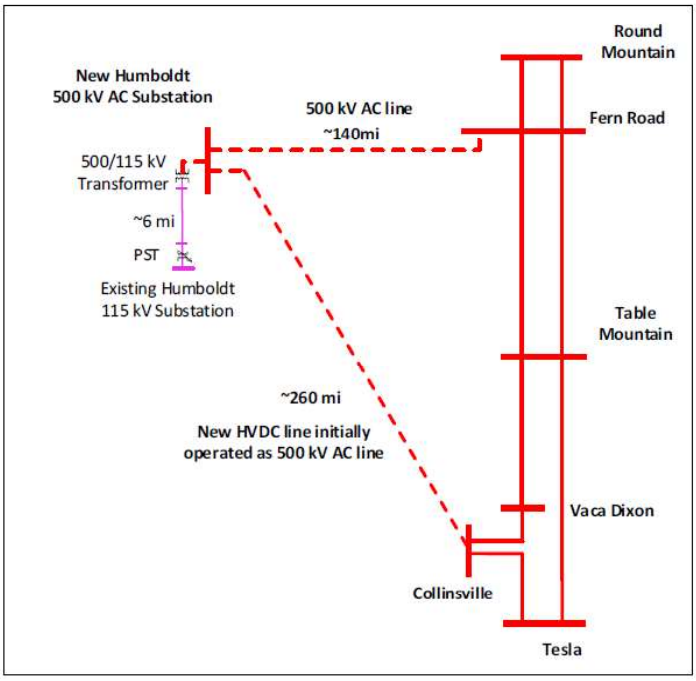
- a new Humboldt 500 kV substation, *together with a new high-voltage direct current ("HVDC") line (approximately 260 miles), initially operated as 500 kV AC line to interconnect the new Humboldt 500 kV substation to the Collinsville 500 kV substation*. (Estimated cost of $1,913 – $2,740 million).

A schematic shown below indicates that the new Humboldt 500 kV substation will interconnect directly to the Substation Project, and bypass PG&E's Vaca-Dixon substation. None of this information was presented in the prelimianry environmental documents submitted to the CPUC. Further, as recent as this month, CAISO annouced a list of qualified project sponsors for the competitive soliciation process for the Humboldt 500 kV substation and 260-mile HVDC line. One

[1] https://www.caiso.com/documents/iso-board-approved-2023-2024-transmission-plan.pdf

of the three qualified sponsors is "Cal Grid, LLC, an LS Power company."[2] CAISO will soon select one of the three qualified sponsors to undertake the project. **However, the Proponent's Environmental Assessment ("PEA")[3] submitted to the CPUC concemplates none of this.**

Figure 3.5-3: Overall Recommended Alternative to Interconnect Humboldt to Fern Road and Collinsville



CEQA defines "project" as the "activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." CEQA § 21065; see also Guidelines § 15378 (the term "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment …'") The Guidelines clarify that the term "project" refers to "the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies[,]" but "does not mean each separate governmental approval." Guidelines § 15378(c) (emphasis added)

Here, the EIR will be wholly deficient under CEQA if it treats the HVDC Line as a separate project entirely, when in fact it is a reasonably foreseeable component of a larger Collinsville Substation project. The substation pre-determines (at the very least) the path of the HVDC line, and therefore

[2] According to Cal Grid, LLC's filings with the California Secretary of State, Cal Grid, LLC is wholly owned by LSP Transmission Holdings II, LLC.
[3] Collinsville 500/230 kilovolt Substation Project, Proponent's Environmental Assessment https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/pea_deficiences.html#Proponents_Environmental_Assessment_and

the EIR must evaluate the environmental impacts of that reasonably foreseeable component – including the full 260 mile-long transmission line from Humboldt County.

III. As Proposed, the EIR Will Constitute "Improper Piecemealing" by Foregoing Environmental Review of the HVDC Line

Under CEQA, lead agencies are prohibited from engaging in piecemealed environmental review (*i.e.*, chopping up a project into small pieces to under-emphasize the collective environmental impacts of the project).[4] Stated differently, CEQA requires a lead agency to consider "the whole of an action" when determining whether the action will have a potentially significant impact on the environment. Further, "[w]here an individual project is a necessary precedent for action on a larger project, or commits the lead agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project."[5] Improper piecemealing occurs "when the purpose of the reviewed project is to be the first step toward future development," or "when the reviewed project legally compels or practically presumes completion of another action."[6] On the other hand, projects can be subject to separate environmental review when they can be implemented without approval of the other.[7]

Here, the newly-announced HVDC Line proposes to interconnect the proposed 500 kv Humboldt Substation directly with the Collinsville Substation. The location of the Collinsville Substation inherently pre-determines the path of the HVDC Line. The Projects *cannot operate independently* from one another, and cannot survive as proposed if one project is approved but the other is not. Therefore, the Collinsville Substation is "the first step towards future development," and practically "presumes completion of another action" (i.e., interconnection to the Humboldt Substation). Accordingly, the EIR must analyze the Collinsville Substation and the HVDC Line together as a single "project" for purposes of CEQA.

[4] CEQA requires a lead agency to consider "the whole of an action" when determining whether the action will have a potentially significant impact on the environment. CEQA Guidelines § 15378; see also *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223 ("the requirements of CEQA cannot be avoided by chopping up proposed projects into bite-size pieces which, when taken individually, may have no significant adverse effect on the environment.") Improper piecemealing occurs "when the purpose of the reviewed project is to be the first step toward future development," or "when the reviewed project legally compels or practically presumes completion of another action." *Banning Ranch Conservancy*, 211 Cal.App.4th at 1223.

[5] CEQA Guidelines § 15165.

[6] *Banning Ranch Conservancy*, 211 Cal.App.4th at 1223 (citations omitted)

[7] *Anderson v. County of Santa Barbara* (2023) 94 Cal.App.5th 554, 574 (citing *Planning & Conservation Leage v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 237; *Sierra Club v. West Side Irrigation Dist.* (2005) 128 Cal.App.4th 690, 699).

IV. The EIR Must Analyze Environmental Impacts Associated with High Voltage Transmission Projects

In addition to the above, California Forever respectfully requests that the Draft EIR consider and evaluate the following environmental impact areas:

- *Ancillary Project Components* – The EIR must analyze the impacts of all other reasonably foreseeable project components, including access roads, communications facilities, and staging areas. The EIR should also consider impacts associated with the removal of existing or aging transmission infrastructure, if any, associated with the Project (including the HVDC Line).

- *Aesthetics* – the EIR must evaluate the potential for substantial adverse impacts to the existing visual character or quality of public views, as well as the effects of new sources of light and glare during project construction and operation. The EIR should also specifically evaluate how transmission towers and lines would impede views on scenic resources, and include visual simulations to accurately discern impacts from proposed transmission towers and lines across the entire HVDC Line path.

- *Agricultural Resources* – the EIR should assess the extent to which the Project (including the HVDC Line) will convert agricultural land (including Prime Farmland and Farmland of Statewide Importance) for utility infrastructure purposes. The analysis should not only cover the Project's direct development footprint, but also ancillary utility practices during project implementation that might individually or cumulatively contribute to loss of farmland (e.g., utility vegetation management practices, limitations on farmworker access, sensitive species disruption that aid agricultural production).

- *Air Quality and Greenhous Gas ("GHG") Impacts* - the EIR should quantify emissions of air quality pollutants and GHG emissions associated with additional truck trips and construction equipment required to construct, operate and maintain not only the Substation, but also the HVDC Line. The EIR must assess whether the Project (including the HVDC Line) will conflict with or obstruct implementation of an applicable air quality plan, or result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment status. This impact must be analyzed not only in the context of the San Francisco Bay Area Air Basin (for the substation and adjacent transmission upgrades), but also the North Coast Air Basin (for portions the HVDC Line). The North Coast Unified Air Quality Management District is currently in "attainment" or "unclassified" status for all the federal and state ambient air quality standards, with the exception of PM 10. The EIR should also evaluate potential health risks on sensitive receptors in a new and expanded Health Risk Assessment ("HRA").

- *Biological Resources* –The EIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats along the HVDC Line.[8] This is especially important given the well-documented impacts that transmission projects can have on sensitive animal and plant species. For example, one 2018 study found that electric transmission lines can cause at least twenty eight (28) biotic impacts, and most of which occur during project operation.[9] It is also plausible that the HVDC Line will run through critical habitat for sensitive species, including portions of the Mendocino National Forest, which actively support federally endangered and threatened species (e.g., the northern spotted owl, summer steelhead, goshawk, pacific marten, and yellow-legged frog). The EIR should also assess the potential that new transmission lines create a substantial collision or electrocution risk for sensitive bird species.[10] In addition,, the Substation is proposed to be located just north of the proposed PG&E Montezuma Island Mitigation Bank, a wetland restoration project that would result in the establishment and enhancement of 31.38 acres of waters of the United States, including wetlands, in the Suisun Bay watershed.[11] The EIR must evaluate whether the Project could impact important biological resources, including the Suisun Bay watershed.

- *Cultural Resources* – Transmission projects can involve ground disturbance activities at depths of 30 feet or more. The EIR must evaluate whether the Project could impact important cultural resources, including tribal remains, in the line of path of the HVDC Line.

- *Noise* – the EIR must analyze noise impacts during construction and operation of the Project, including increases in ambient noise levels and consistency with local noise regulations. The EIR should also discuss "corona noise" generated by high voltage transmission lines, which is a high-pitched noise due to the ionization of air around the conductors. Noise generated by high voltage lines that can reach several tens of decibels

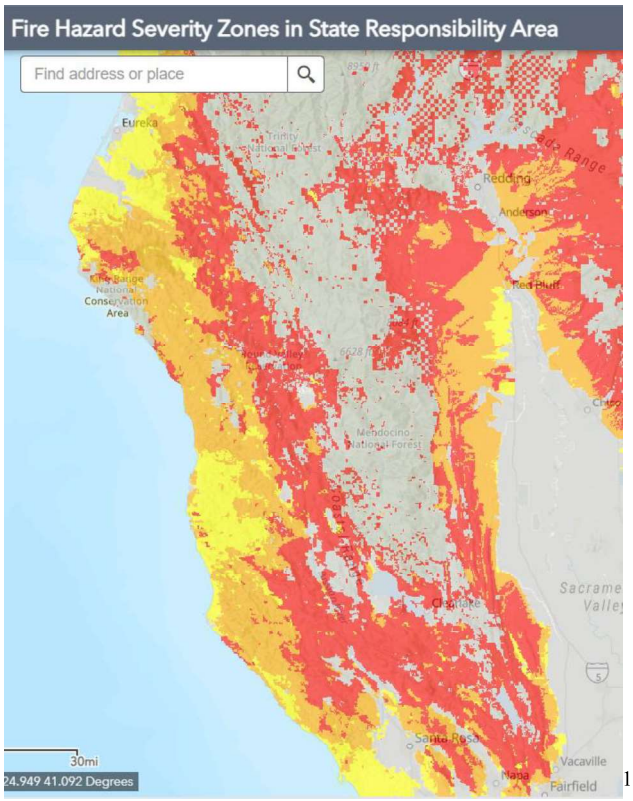
[8] Fish & G. Code § 3511.
[9] Biasotta, L., et al., *Power lines and impacts on biodiversity: A systematic review* (Jul. 2018), available at https://doi.org/10.1016/j.eiar.2018.04.010
[10] Birds are vulnerable to collisions with a range of fixed structures, including transmission lines. (See, e.g., Erickson, W. P., G. D. Johnson, M. D. Strickland, K. J. Sernka, and R. E. Good. 2001. *Avian collisions with wind turbines: a summary of existing studies and comparisons to other sources*; Manville, A. M., II. 2005. *Bird strikes and electrocution at power lines, communication towers, and wind turbines: state of the art and state of the science—next step toward mitigation*. U.S. Forest Service General Technical Report PSW-GTR-191). Estimates of mortality due to collisions with power lines in the United States have ranged from hundreds of thousands to 175 million birds each year. (See, Erickson et al. 2001). Transmission lines not only cause direct mortality of birds, but also can cripple individuals, which can result in delayed and inhumane deaths. See, Pandey, A., R. Harness, and M. K. Schriner. 2008. *Bird strike indicator field deployment at the Audubon National Wildlife Refuge in North Dakota: phase two*. California Energy Commission, PIER Energy Related Environmental Research Program. CEC-500-2008-020.)
[11] https://www.spk.usace.army.mil/Media/Regulatory-Public-Notices/Article/3504127/spk-2023-00472-public-notice-of-proposed-montezuma-island-mitigation-bank-sacra/

at the source, which is known to be correlated with the corona effect.[12] One 2023 scientific study observed that audible noise caused by corona discharge of HVDC transmission lines in high-altitude areas is more intense than that in low-altitude areas, making this an important consideration when siting HVDC transmission lines in high-altitude areas.[13]

- *Wildfire and Health Hazards* - the EIR must evaluate the potential for the Project to exacerbate wildfire hazard or expose people to wildfire related hazards (i.e., pollutants, flooding, landslides). It is plausible that the proposed HVDC Line will traverse through substantial areas of Northern California that are designated as High Fire Hazard Severity Zones ("VHFHSZ") under CalFire's mapping system. A strong body of academic studies has concluded that high voltage transmission lines located in sharply continental climates (*i.e.*, low temperatures in winter, high temperatures in summer) are more prone to deteriorate influences, and that weather factors (e.g., rain, snow, wind) are considered the main reasons for the decrease in reliability.[14] Other research has found that earthquakes can cause transmission towers, poles or lines to collapse, triggering forest fires.[15] High-voltage direct current transmission lines are also particularly susceptible to lightning overvoltages, which result in power supply interruptions and apparatus deterioration and malfunctions.[16] The EIR should evaluate the extent to which the HVDC Line and its location in Northern California (which has a more variable climate than the Greater Bay Area) may result in a higher propensity for fallen transmission lines, and therefore increased wildfire risks. The EIR should also evaluate the extent to which Project implementation (including workforce traffic) may obstruct local hazard mitigation plan and resident evacuations.

[Rest of this page is intentionally empty, continued on next page.]

[12] Li L., Meng W., Li Q., Wang Y., Zheng X., Wang H. *Research Progress on Audible Noise Emitted from HVDC Transmission Lines. Energies* (Mar. 2023) available at https://www.mdpi.com/1996-1073/16/12/4614
[13] Zhao, L. et al, *Corona current and audible noise characteristics of HVDC transmission lines and their relationship at high-altitude* (Mar. 2023), available at https://doi.org/10.1049/gtd2.12832
[14] Gracheva, E. et al., *Modeling the Reliability of High-Voltage Power Transmission Lines Taking into Account the Influence of the Parameters of a Sharply Continental Climate* (Nov. 2022), available at https://www.sciencedirect.com/science/article/pii/S2590061724000772
[15] Chang, L, Wu Z, *Performance and reliability of electric power grids under cascading failures*, (2011) Int. J. Electric Power Energy System, available at http://refhub.elsevier.com/S2590-0617(24)00077-2/rf0045
[16] Zalhaf, A. et al., *Evaluation of the Transient Overvoltages of HVDC Transmission Lines Caused by Lightning Strikes* (Jan. 2022), available at https://www.mdpi.com/1996-1073/15/4/1452



[17]

Lastly, the effect of electromagnetic fields ("EMF") on the health of living organisms may still be considered as an open research topic. Low-frequency EMF, typical for example of transmission lines, have already been classified by the International Agency for Research on Cancer as possibly carcinogenic, and recent studies have confirmed their possible negative role on health.[18]

V. The EIR and its Project Description Must be Updated to Reflect an Alternative Location

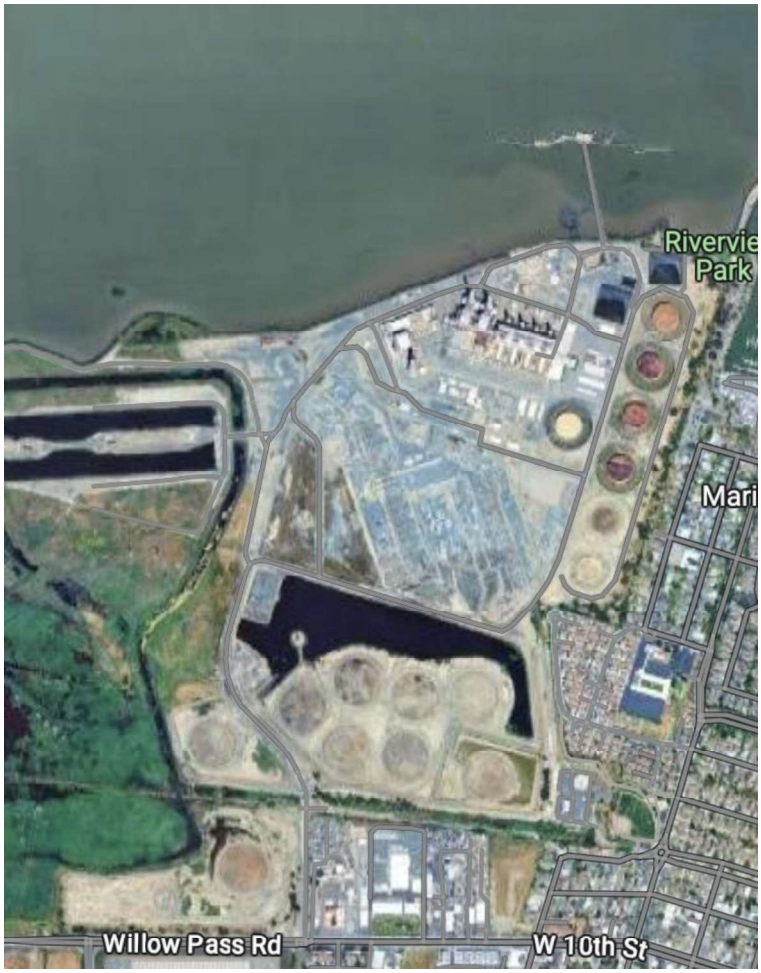
California Forever hereby requests that the Draft EIR (and its Project Description) revise the proposed location of the substation, in favor of an alternative location. Specifically, LS Power should relocate the Project to pre-existing disturbed and industrialized lands in Contra Costa County, immediately next to the PG&E Pittsburg Substation that the new Substation is meant to connect to (the "Alternative Location").

---

[17] CALFire, Fire Hazard Severity Zones in State Responsibility Area, (April 1, 2024), available at https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008

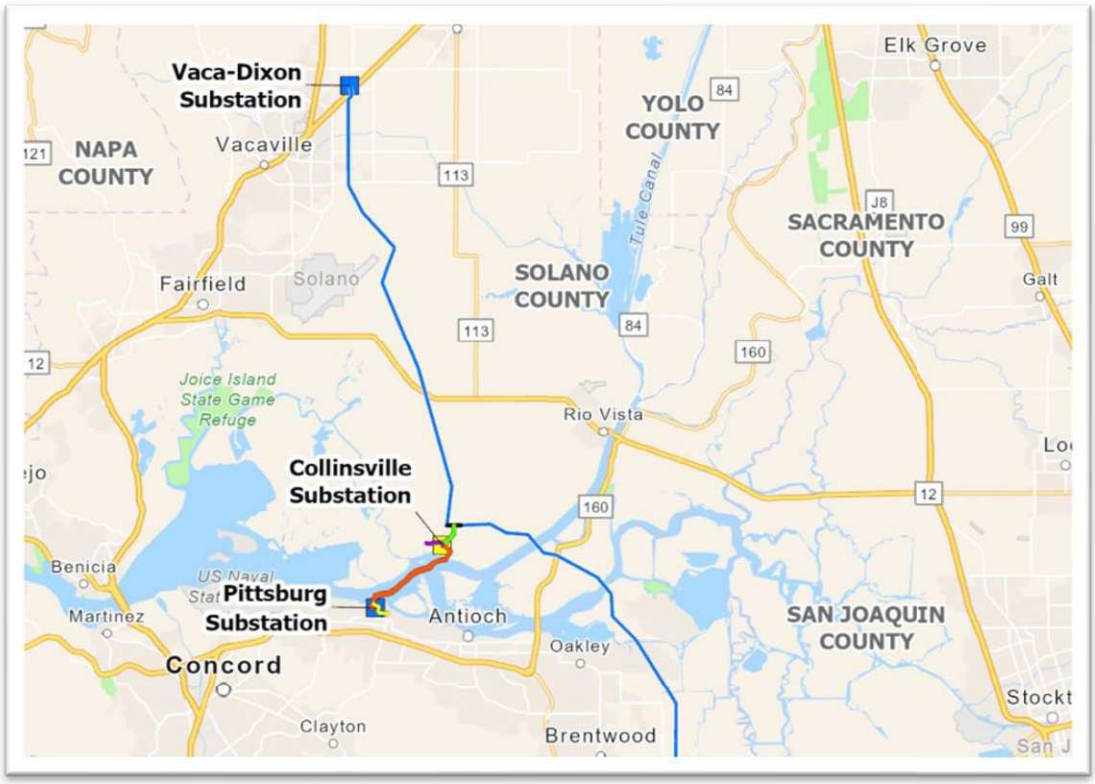
[18] Malagoli C., Malavolti M., Wise L.A., Balboni E., Fabbi S., Teggi S., Palazzi G., Cellini M., Poli M., Zanichelli P., et al. *Residential exposure to magnetic fields from high-voltage power lines and risk of childhood leukemia*. Environ. Res, available at https://pubmed.ncbi.nlm.nih.gov/37271435/; *see also* WHO, IARC, *Non-Ionizing Radiation, Part 1: Static and Extremely Low-Frequency (ELF) Electric and Magnetic Fields.* IARC Press; Lyon, France: 200, available at https://www.ncbi.nlm.nih.gov/books/NBK390731/

The Alternative Location includes and/or is adjacent to multiple acres of brownfield lands that previously served industrial uses which would be perfectly suited to host the substation, with far lower environmental impacts, as depicted in the aerial photo shown below.



[Rest of this page is intentionally empty, continued on next page.]

Relocating the Substation to this location would essentially keep the proposed new Vaca-Dixon Line to Pittsburg Substation line the same (shown in green and orange in the below), but it would move the new Substation from locating it on greenfield agricultural land in Solano County (shown as yellow square on the below) to collocating it next to the Pittsburg Substation, on already disturbed brownfield industrial lands (the blue rectangle).

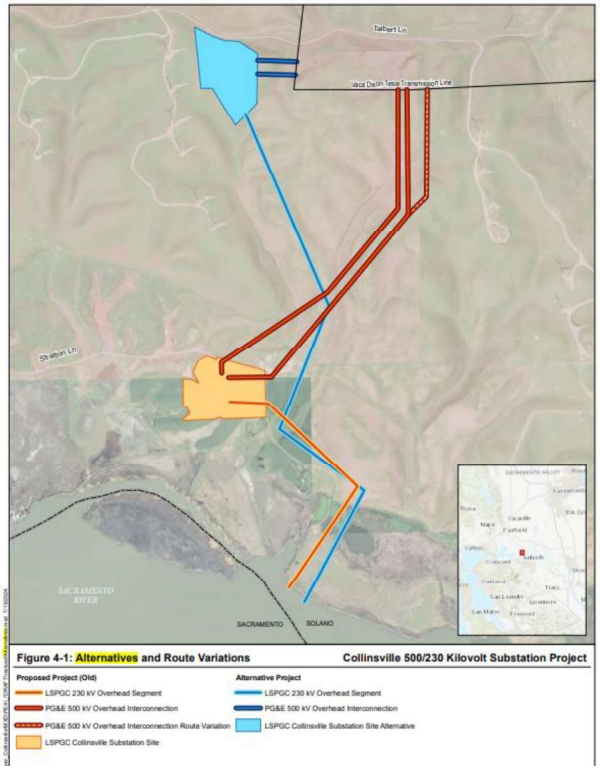


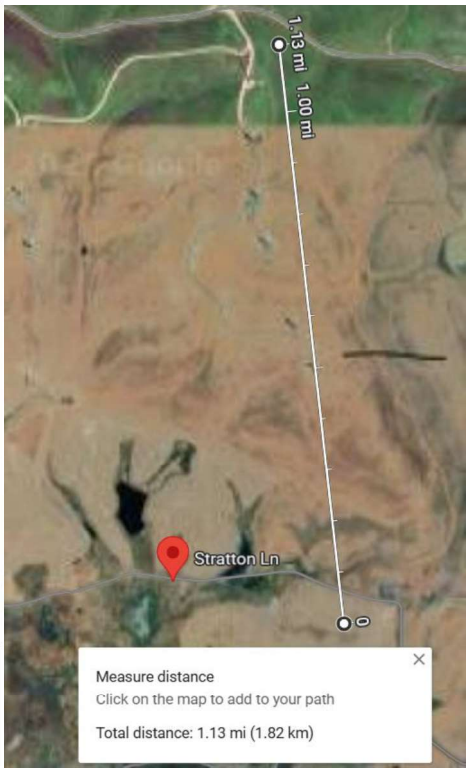
Locating the substation component of the Project here would also address concerns about pre-determining the location of the HVDC transmission from Humboldt County. Specifically, that location would preserve the option of running the Humboldt-Bay Area transmission using many of the routes studied in CAISO's Transmission Plans, which could go through any of the corridors, eventually terminate in the Bay/Sacramento River, and then continue to the new Substation through submarine cables that minimize the impact on the environment, and the need for takings of private property. CAISO's own corridor studies for the Humboldt 500 kV in line in fact already evaluated some of those submarine corridors, and confirmed that these are feasible, and would have far lower environmental and wildfire risk impacts.

VI. The EIR Must Meaningfully Evaluate Alternative Locations, Including Environmentally Superior Locations

Pursuant to CEQA Guidelines Section 15126(a), an EIR must "describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Feasibility is defined under CEQA as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." CEQA Guidelines § 15364.

The Project's PEA states that LS Power previously identified one substation site alternative and one 230 kV overhead transmission line alternative route that extends toward the northern shore of the Sacramento River.[19] However, according to California Forever's approximation (see below), that alternative substation site is located a mere mile to the north of the proposed site. Given their proximity, California Forever is skeptical that an alternatives analysis based on this substation alternative site will show any significant differences (from an environmental perspective) from the proposed site.





[19] PEA at 4-3, available at https://ia.cpuc.ca.gov/environment/info/panoramaenv/collinsville/PEA/FINAL%20LSP%20Collinsville%20PEA%20240729S.pdf

If the EIR's Project Description does not include an alternative location for the substation component of the Project, the EIR must contain a meaningful Alternatives Analysis of environmentally superior site locations (discussed above).

VII. Conclusion

California Forever appreciates the opportunity to submit scoping comments on the forthcoming EIR for the Project, and respectfully requests that the CPUC and LS Power take these comments into consideration to achieve a legally adequate environmental document under CEQA.

Sincerely yours,

HOLLAND & KNIGHT LLP

Jennifer L. Hernandez

6 February 2025

Connie Chen
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
connie.chen@cpuc.ca.gov

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, COLLINSVILLE 500/230 KILOVOLT SUBSTATION PROJECT, SCH#2025010149, ALAMEDA, CONTRA COSTA, SACRAMENTO, AND SOLANO COUNTIES

Pursuant to the State Clearinghouse's 6 January 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Collinsville 500/230 Kilovolt Substation Project, located in Alameda, Contra Costa, Sacramento, and Solano Counties.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as

required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201805.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit

requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at: http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state

may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the

Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/help/permit/

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter G. Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

Aaron Lui
Panorama Environmental, Inc.
Aaron.lui@panoramaenv.com

Douglas Mulvey
LS Power Grid California, LLC
dmulvey@lspower.com

SMUD®

Comments provided via email:
collinsville@panoramaenv.com
connie.chen@cpuc.ca.gov

February 6, 2025

Subject: LS Power Collinsville 500/230 KV Substation Project (CPCN A.24-07-018)

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the LS Power Grid California, LLC (LSPGC) Collinsville 500/230 kV Substation Project (Proposed Project). SMUD is the primary energy provider for Sacramento County and operates the Solano Wind Project in the Montezuma Hills Wind Resource Area which borders the Proposed Project.

SMUD has been cooperating with LSPGC's request for information regarding locating the Proposed Project near SMUD's wind turbines and collection system. We appreciate the collaboration effort from LSPGC.

SMUD operates facilities that generate and transmit renewable energy, which is critical for addressing climate change, reducing regional air quality impacts, and providing reliable energy to residential and commercial users. To that end, SMUD wants to ensure that the Proposed Project minimizes effects on SMUD facilities, employees, and contractors; as well as more general environmental impacts, such as protected species. It is our desire that the Proposed Project will acknowledge impacts related to, but not limited to, the following items and SMUD will have the opportunity to engage and review impact resolutions.

- Installation of structures impacting or reducing wind velocity at SMUD's existing wind turbines, which could affect generation.
- Equipment or utilities temporarily or permanently crossing SMUD underground electrical lines.
- Impact of transmission lines on clearances for transport on existing access roads, which are critical for installing and maintaining renewable generation.
- Use of Solano Wind Project access roads.
- Underground collection line easements and right of way. Please view the following links on smud.org for more information regarding encroachment:
  https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way

The Collinsville Substation Notice of Preparation (NOP) and Scoping presentation was held on January 21, 2025. SMUD requests the following changes be implemented.

- Construct the 500 KV and 230 KV transmission towers using tubular towers instead of lattice towers. SMUD currently monitors avian impact related to the wind turbines. SMUD has been continuously working to improve manmade structures to reduce avian nesting and perch habitat. Lattice structures provide habitat that leads to increase in avian activity in the area. Increase in avian strikes because of new lattice structures would cause an avoidable environmental impact and should be mitigated through design.
- Construct the microwave tower using tubular towers instead of lattice towers. The reasoning is the same as mentioned above.
- Move the transmission lines and towers outside the turbine blade throw distances. This will ensure the highest reliability for the transmission lines.
- Consider changing the 230 KV overhead transmission line from the Collinsville substation to the Sacramento River to underground transmission lines to reduce overhead visual impact, avian impact, and reliability concerns due to the vicinity of wind turbines.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the Proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Sincerely,

Blake Heinlein

Blake Heinlein
Project Development Manager – SMUD Power Generation
Sacramento Municipal Utility District
6201 S Street, Mail Stop B306
Sacramento, CA 95817
blake.heinlein@smud.org
916-732-5823