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SIERRA NEVADA REGION

# Sacramento Area Voltage Support

## FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT AND ENVIRONMENTAL IMPACT REPORT

Supplying Energy



Preserving Reliability

Re-issued March 2008

## COVER SHEET

**Type of Statement:** Sacramento Area Voltage Support  
Re-issued Final Supplemental Environmental Impact  
Statement (SEIS) and Environmental Impact Report (EIR)

**Lead Agency:** Western Area Power Administration

**Location:** Placer, Sacramento, and Sutter Counties,  
State of California

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**California State Clearinghouse  
Number:** 2006052119

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### Abstract

Western Area Power Administration (Western) markets and transmits wholesale electricity from multi-use, Federal water projects to more than 70 preference customers in central and northern California and Nevada. Western's Sierra Nevada Region includes more than 1,200 miles of transmission lines in the greater Sacramento-area of California. These transmission lines are interconnected to other greater Sacramento-area transmission system owners, Load Serving Entities, and utilities, including the Sacramento Municipal Utility District (SMUD) and the City of Roseville (Roseville). Western's system contributes to and is affected by voltage stability, reliability, and security of the greater Sacramento-area transmission system. Transmission system studies performed in 2006 and 2007 showed that additions and upgrades are needed to maintain system voltage stability, reliability, and security in accordance with North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) Planning/Operations Reliability Standards, and for Western to continue to meet its legislative and contractual requirements. The resulting system additions and upgrades would also provide additional power importing capabilities to the greater Sacramento area. Western proposes to construct approximately 31 to 38 miles of new, double-circuit, 230-kilovolt (kV) transmission line between Western's O'Banion Substation and the area just south of SMUD's Elverta Substation and reconstruct SMUD's existing 230-kV/115-kV transmission line between SMUD's Elverta and Natomas substations. Western prepared this Supplemental Environmental Impact Statement (SEIS) to comply with its requirements under the National Environmental Policy Act. SMUD and Roseville participated in the preparation of the joint SEIS and Environmental Impact Report (EIR) to comply with their requirements under the California Environmental Quality Act.

The Sacramento Area Voltage Support Project SEIS and EIR, in whole, consists of the Draft and Final SEIS and EIR. The SEIS and EIR contains a description of the proposed Project, existing environmental conditions for the project area, findings of environmental effects, and comparison of alternatives, including the Preferred Alternative and the Environmentally Preferred Alternative. Alternative B was found to be the Environmentally Preferred Action Alternative. Similarly, Western considered its determination of the Environmentally Preferred Action Alternative, consistency with the Project's purpose and need, and economic and engineering factors to select Alternative B as the overall Preferred Alternative. The Notice of Availability for the Sacramento Area Voltage Support Final SEIS and EIR was published in the *Federal Register* on February 15, 2008. Since then, Western identified 11 comment letters, which were previously omitted. These comments and Western's responses to them are addressed in this re-issued Final SEIS and EIR. The comments and responses do not change the conclusions and no new modifications, addenda, or corrections to the Draft SEIS and EIR are necessary. The re-issued Final SEIS and EIR replaces the February 2008 document in its entirety. A Record of Decision will be published no sooner than 30 days from the publication date of this Re-issued Final SEIS and EIR.



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# 1.0 Supplemental Environmental Impact Statement and Environmental Impact Report Document Summary

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# CHAPTER 1.0 SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT AND ENVIRONMENTAL IMPACT REPORT DOCUMENT SUMMARY

The Notice of Availability for the Sacramento Area Voltage Support Final SEIS and EIR was published in the *Federal Register* on February 15, 2008. Since then, Western identified 11 comment letters, which were previously omitted. These comments and Western's responses to them are addressed in this re-issued Final SEIS and EIR. The comments and responses do not change the conclusions and no new modifications, addenda, or corrections to the Draft SEIS and EIR are necessary. The re-issued Final SEIS and EIR replaces the February 2008 document in its entirety.

## 1.1 INTRODUCTION

On July 13, 2007, the Western Area Power Administration (Western), in coordination with the Sacramento Municipal Utility District (SMUD) and the City of Roseville (Roseville), filed with the California State Clearinghouse and circulated a joint Draft Supplemental Environmental Impact Statement (SEIS) and Environmental Impact Report (EIR) to the public for a 45-day comment period, in compliance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality Guidelines (40 Code of Federal Regulations 1500 to 1508), California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000, et seq.), and California CEQA Guidelines (14 California Code of Regulations 15000, et seq.). The Draft SEIS and EIR evaluated the potential impacts from construction and operation of the proposed Sacramento Voltage Support Project (Project). The Draft SEIS and EIR included analysis of seven action alternatives, along with the No Action Alternative. Notices of the release of the Draft SEIS and EIR for public review were published in the *Sacramento Bee*, the *Press Tribune* (Roseville edition), and the *Appeal Democrat*. Property owners within 500 feet of the proposed Project's right-of-way (ROW) were notified by direct mailings.

Two public forum hearings were held: one on August 7, 2007, in Roseville, California, and one on August 8, 2007, in Sacramento, California. The public forum hearings were successful in soliciting oral comments from ten people and written comments from two people. Additionally, Western received written comments from 44 commenters via mail, e-mail, and facsimile outside of the public forum hearings, but within the public comment period. Comments were received from a total of 56 agencies, organizations, and individuals. The public comment period closed on August 27, 2007. Along with findings in the Draft SEIS and EIR, Western used public and agency comments to guide its selection of the Environmentally Preferred Alternative and Preferred Alternative.

The full text of the Draft SEIS and EIR has not been reprinted. Rather, the information in this document, combined with the Draft SEIS and EIR, serve as the Final SEIS and EIR. Federal regulations allow for an abbreviated final document when few changes result from comments received. The relevant section of

these regulations (40 CFR 1503.4) states that if changes in response to public comments are minor and confined to factual corrections or explanations of why comments do not warrant further agency response, they may be written on errata sheets instead of rewriting, printing, and distributing an entire, revised EIS.

This Final SEIS and EIR contains the following sections:

- Cover Sheet
- Chapter 1 SEIS and EIR Document Summary
- Chapter 2 Public and Agency Comments
- Chapter 3 Modifications, Addenda, and Corrections
- Chapter 4 References
- Chapter 5 Recipients of the SEIS and EIR

## 1.2 PURPOSE AND NEED

Transmission system studies performed in 2001/2002 and 2006/2007 show that the existing transmission lines in the greater Sacramento area have reached their maximum power transfer limits for serving the area's energy needs, particularly in the northern portion of the greater Sacramento area. Load Serving Entities and utilities in the area have taken interim measures to avoid potential uncontrolled system-wide outages. As a last resort, operators may be required to implement post-contingency load shedding and/or rotating blackouts. These measures provide limited voltage stability improvement and are not always available or preferred. In addition, load shedding and rotating blackouts can have a significant negative impact on utility customers.

Western, greater Sacramento-area transmission system owners, Load Serving Entities, and utilities therefore need transmission system additions and upgrades to maintain voltage stability, reliability, and security in accordance with the North American Electric Reliability Corporation and the Western Electricity Coordinating Council Planning/Operations Reliability Standards and to continue meeting Western's legislative and contractual requirements. The resulting system additions and upgrades would provide additional power-importing capabilities to the greater Sacramento area.

## 1.3 PROPOSED PROJECT

The proposed Project consists of the following components:

1. Constructing a new, double-circuit 230-kilovolt (kV) transmission line between O'Banion Substation and the area just south of the Elverta Substation. This transmission line

would include a new circuit from O'Banion Substation to Elverta Substation and a new circuit from O'Banion Substation to Natomas Substation.

2. Reconstructing the existing double-circuit 230-kV/115-kV transmission line between Elverta Substation and Natomas Substation into a double-circuit 230-kV transmission line.

## 1.4 ALTERNATIVES

Western analyzed seven action alternatives and the No Action Alternative in the SEIS and EIR. Figure 1-1 presents an illustration of the alternatives and their locations within the study area. Segments 1 and 3 are common to each action alternative. Segment 1 would consist of constructing a new transmission line from the O'Banion Substation to an area near Cross Canal. Segment 3 would consist of rebuilding the existing SMUD double-circuit 115/230-kV Elverta-North City and Elverta-Natomas transmission lines within an existing ROW between the Elverta and Natomas substations.

Seven routes were identified for Segment 2, which differentiate the alternatives as described below. Each of the 2A segments (i.e., 2A1 through 2A5) includes an option to be located along either the west or east side of Highway 99. Additional details and alternative comparisons are provided in Table B-1 in Appendix B.

Alternative A1 is composed of Segments 1, 2A1, and 3. It would involve construction of a new double-circuit 230-kV transmission line approximately 33.6 to 33.8 miles long (depending on whether it is located on the east or west side of Highway 99) and rebuilding approximately 4.8 miles of existing Elverta-North City and Elverta-Natomas transmission lines.

Alternative A2 is composed of Segments 1, 2A2, and 3. It would involve construction of a new double-circuit 230-kV transmission line approximately 33.5 to 33.7 miles long (depending on whether it is located on the east or west side of Highway 99) and rebuilding approximately 4.8 miles of existing Elverta-North City and Elverta-Natomas transmission lines.

Alternative A3 is composed of Segments 1, 2A3, and 3. It would involve construction of a new double-circuit 230-kV transmission line approximately 33.8 to 34.0 miles long (depending on whether it is located on the east or west side of Highway 99) and rebuilding approximately 4.8 miles of existing Elverta-North City and Elverta-Natomas transmission lines.

Alternative A4 is composed of Segments 1, 2A4, and 3. It would involve construction of a new double-circuit 230-kV transmission line approximately 35.2 to 35.4 miles long (depending on whether it is located on the east or west side of Highway 99) and rebuilding approximately 4.8 miles of existing Elverta-North City and Elverta-Natomas transmission lines.

Alternative A5 is composed of Segments 1, 2A5, and 3. It would involve construction of a new double-circuit 230-kV transmission line approximately 33.7 to 33.9 miles long (depending on whether it is located on the east or west side of Highway 99) and rebuilding approximately 4.8 miles of existing Elverta-North City and Elverta-Natomas transmission lines.

Alternative B is composed of Segments 1, 2B, and 3. It would involve construction of a new double-circuit 230-kV transmission line approximately 31.3 miles long and rebuilding approximately 4.8 miles of existing Elverta-North City and Elverta-Natomas transmission lines.

Alternative C is composed of Segments 1, 2C1, 2C2, and 3. It would involve construction of a new double-circuit 230-kV transmission line approximately 37.6 miles long and rebuilding approximately 4.8 miles of existing Elverta-North City and Elverta-Natomas transmission lines. This alternative would abandon 8.6 miles of existing Cottonwood-Roseville transmission line.

The No Action Alternative would include operation and maintenance of the existing transmission lines. Western would not build any of the new transmission line segments presented in the SEIS and EIR. Implementing this alternative would preclude most short-term environmental impacts associated with construction activities. This alternative would not meet the proposed Project's purpose and need. The No Action Alternative would not alleviate the greater Sacramento-area power system voltage stability, reliability, and security problems. While Western and interconnected transmission system owners, Load Serving Entities, and area utilities would continue to take appropriate measures to manage power system reliability, they may be unable to meet system reliability standards and contractual obligations under the No Action Alternative.

Western and SMUD have proactively developed Environmental Protection Measures (EPMs) as part of the proposed Project to protect sensitive resources in the field. These detailed EPMs would be implemented as part of the proposed Project. Refer to Table C-1 in Appendix C for a list of EPMs.

## 1.5 IMPACTS

Chapter 4 of the Draft SEIS and EIR provides a detailed impact analysis of the 17 resource areas analyzed. For cultural resources, electric and magnetic fields (EMF), environmental justice, floodplains, geology, health and safety, noise, paleontological resources, socioeconomic, soils, and water resources, impacts would not appreciably differ among action alternatives. None of the alternatives would result in significant direct, indirect, or cumulative impacts for any of these resource areas. The remaining resource areas are discussed below.

### Air Quality

With regard to air quality, the area is in non-attainment for ozone, nitrogen oxides, volatile organic compounds, reactive organic gases, and particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>). Differences among alternatives would be small and contributions of the above-mentioned pollutants would be in direct correlation to the length of each alternative and time needed to complete construction. Because Alternative C involves the most distance and time for construction, it would have the most impact on air resources. Alternative B would have the least impact on air resources because it involves the least distance and time for construction. Impacts from the proposed Project would be short-term, occurring only during construction. All

recommended mitigation measures from applicable air districts would be applied to the proposed Project. Therefore, no significant direct, indirect, or cumulative effects would result from any of the alternatives.

## Biological Resources

The differences in impacts to biological resources among action alternatives would be small and vary by species and habitat. In particular, the alternatives would affect varying amounts of rice fields (habitat for the giant garter snake), wetlands, vernal pools, and existing or proposed conservation areas.

The A alternatives would have the greatest impact on rice fields and would pass through and/or adjacent to the Natomas Basin Conservancy, an area managed under the Natomas Basin Habitat Conservation Plan (NBHCP). Alternative B would have the least impact on rice fields and habitat conservation plan (HCP) areas. Conversely, Alternative B would have the greatest impact on wetlands and vernal pools and the A alternatives would have the least impact on wetlands and vernal pools. Western would incorporate additional mitigation measures identified during consultation with appropriate agencies. Therefore, no significant direct, indirect, or cumulative effects would result from any of the alternatives.

## Land Use

The differences in impacts to land uses among action alternatives would be small and vary by use. In particular, the action alternatives demonstrate comparative differences for existing residences, prime and unique farmland, and planned development. Segment 2B of Alternative B would be constructed near 16 existing residences located adjacent to the proposed Project alignment. The A alternatives have the greatest impacts on prime and unique farmland. Alternative C would cross or be located adjacent to the greatest number of planned developments in the area. While these impacts exist among alternatives, none would result in significant direct, indirect, or cumulative effects for any alternative.

## Traffic and Transportation

The main difference in traffic and transportation impacts among alternatives is that, for the A alternatives west of Highway 99, the proposed Project would have to cross Highway 99 three times compared with one time for all other action alternatives. These impacts would be limited to the construction period. No significant direct, indirect, or cumulative effects would result from any of the alternatives.

## Visual Resources

The effects on visual resources from the proposed Project are similar for all action alternatives. The City of Roseville, however, has a specific, approved visual policy with which Alternative C would conflict. Therefore, Alternative C would result in a significant indirect and cumulative impact. No other alternatives would result in significant direct, indirect, or cumulative effects.

Tables 1-1 and 1-2 provide a summary of impacts from alternatives.

## 1.6 PREFERRED ALTERNATIVES

Determining the Preferred Alternative requires that Western balance many factors with the proposed Project's purpose and need. Western selected the No Action Alternative as the Environmentally Preferred Alternative because it would have no impacts to environmental resources. The No Action Alternative would not, however, meet the proposed Project's purpose and need.

Because the No Action Alternative would not meet the proposed Project's purpose and need, Western selected Alternative B as the Environmentally Preferred Action Alternative. Alternative B would not result in a significant adverse environmental effect on any resource and would be the shortest route, requiring the least amount of disturbance for the transmission line and access roads. In comparison to the other action alternatives, Alternative B would have greater effects on wetlands, vernal pools, and existing residences; however, these impacts could be minimized through proper design. Also, Alternative B would generally have less impact on other environmental considerations, including air quality, giant garter snake habitat, existing and planned habitat conservation plan areas, prime and unique farmland, and planned transportation projects. Tables 1-1 and 1-2 show comparisons of environmental impacts among alternatives.

Western considered its determination of the Environmentally Preferred Action Alternative, consistency with the Project's purpose and need, and economic and engineering factors to select the overall Preferred Alternative. Alternative B is partially within an established north-south transmission line corridor and in or immediately adjacent to an abandoned railroad ROW. It is the shortest of the action alternatives, which would result in preferable economics and less-than-significant environmental impacts, which are described above. Therefore, Western selected Alternative B as the overall Preferred Alternative.



<b>Table 1-1 Summary of Alternative Impacts</b>									
Resource Issue	Impacts	Alternative A1 Impacts	Alternative A2 Impacts	Alternative A3 Impacts	Alternative A4 Impacts	Alternative A5 Impacts	Alternative B Impacts	Alternative C Impacts	No Action
<b>Air Quality<sup>1</sup></b>									
Air emission standards	Short-term construction emissions exceed PM <sub>10</sub> , NO <sub>x</sub> , or VOC air district thresholds (units are in lbs/day)	ROG=16.4 NO <sub>x</sub> =114.2 PM <sub>10</sub> =12.1	ROG=16.4 NO <sub>x</sub> =114.2 PM <sub>10</sub> =12.1	ROG=16.4 NO <sub>x</sub> =114.2 PM <sub>10</sub> =12.1	ROG=16.5 NO <sub>x</sub> =115.7 PM <sub>10</sub> =12.1	ROG=16.3 NO <sub>x</sub> =113.4 PM <sub>10</sub> =12.0	ROG=16.3 NO <sub>x</sub> =113.0 PM <sub>10</sub> =12.0	ROG=16.7 NO <sub>x</sub> =119.1 PM <sub>10</sub> =12.2	No
		O'Banion Substation* ROG=3.0 NO <sub>x</sub> =21.0 PM <sub>10</sub> =0.6							
		Elverta/Natomas Substation* ROG=2.2 NO <sub>x</sub> =13.1 PM <sub>10</sub> =0.4							
<b>Biological Resources<sup>2,3,4,5</sup></b>									
Giant garter snake habitat	Potential effects on giant garter snakes in rice field complexes	270.3 (E)/ 283.1 (W) acres rice fields	260.6 (E)/ 275.1 (W) acres rice fields	281.1 (E)/ 292.1 (W) acres rice fields	272.3 (E)/ 277.1 (W) acres rice fields	279.8 (E)/ 297.1 (W) acres rice fields	162.7 acres rice fields	236.0 acres rice fields	No
	Potential effects to fresh-water emergent wetlands and water bodies	8.1 acres emergent wetlands	8.1 acres emergent wetlands	8.1 acres emergent wetlands	8.1 acres emergent wetlands	8.1 acres emergent wetlands	19.5 acres emergent wetlands	10.8 acres emergent wetlands	
Vernal pool habitat	Potential effects on vernal pools, seasonal wetlands, and wetland swales	4.0 total acres	4.0 total acres	9.2 total acres	3.4 total acres	3.7 total acres	11.1 total acres	11.8 total acres	No
Special-status fish habitat	Potential effects on Central Valley steelhead and chinook salmon	Minor amounts of habitat would be permanently removed	Minor amounts of habitat would be permanently removed	Minor amounts of habitat would be permanently removed	Minor amounts of habitat would be permanently removed	Minor amounts of habitat would be permanently removed	Minor amounts of habitat would be permanently removed	Minor amounts of habitat would be permanently removed	No

<b>Table 1-1 Summary of Alternative Impacts</b>									
Resource Issue	Impacts	Alternative A1 Impacts	Alternative A2 Impacts	Alternative A3 Impacts	Alternative A4 Impacts	Alternative A5 Impacts	Alternative B Impacts	Alternative C Impacts	No Action
<b>Cultural Resources<sup>3</sup></b>									
	Potential effects to prehistoric cultural resources, historic cultural resources, and TCPs	No adverse effect under Programmatic Agreement	No adverse effect under Programmatic Agreement	No adverse effect under Programmatic Agreement	No adverse effect under Programmatic Agreement	No adverse effect under Programmatic Agreement	No adverse effect under Programmatic Agreement	No adverse effect under Programmatic Agreement	No
<b>Electric and Magnetic Fields<sup>3</sup></b>									
	Potential corona, field, and health effects	No	No	No	No	No	No	No	No
<b>Environmental Justice<sup>3</sup></b>									
	Low-income, minority, or subsistence populations in the project area are disproportionately affected	No	No	No	No	No	No	No	No
<b>Floodplains<sup>3,6</sup></b>									
Obstruction of flood flows, decreased capacity to convey peak flows, and destabilization of soils	100-year floodplain acres within proposed Project ROW	245.5(E)/ 255.9(W) acres	244.0(E)/ 253.9(W) acres	248.2(E)/ 257.9(W) acres	269.1(E)/ 278.9 (W) acres	247.6(E)/ 257.9 (W) acres	184.6 acres	155.6 acres	No
	Long-term effects attributable to concrete footings	22.4(E)/ 23.7(W) long-term acres	22.2(E)/ 23.4 (W) long-term acres	22.7(E)/ 23.9(W) long-term acres	25.3(E)/ 26.5(W) long-term acres	22.7(E)/ 23.9(W) long-term acres	14.9 long-term acres	5.8 long-term acres	No

<b>Table 1-1 Summary of Alternative Impacts</b>									
Resource Issue	Impacts	Alternative A1 Impacts	Alternative A2 Impacts	Alternative A3 Impacts	Alternative A4 Impacts	Alternative A5 Impacts	Alternative B Impacts	Alternative C Impacts	No Action
<b>Geology<sup>3</sup></b>									
	Subsidence, landslides, and seismic hazards	No	No	No	No	No	No	No	No
<b>Health and Safety<sup>3</sup></b>									
	Potential effects from hazardous materials/waste, electrical hazards, and fall hazards	No	No	No	No	No	No	No	No
<b>Land Use<sup>3</sup></b>									
Proximity of new transmission line ROW to existing residences and planned development, loss of prime farmland, effects on recreation and open space, and impacts to traffic patterns during construction	<u>Short-term effects:</u> Traffic patterns may be suspended during construction	Short-term construction impacts	Short-term construction impacts	Short-term construction impacts	Short-term construction impacts	Short-term construction impacts	Short-term construction impacts	Short-term construction impacts	No
	<u>Long-term effects:</u> Conflict with approved and/or adopted land use plans	In Segment 2A1, adjacent to 0 residence/business parcels  In Segment 2A1, crosses 5 residence/business parcels  Crosses or is adjacent to 3 planned developments  No conflict with existing land use plans	In Segment 2A2, adjacent to 0 residence/business parcels  In Segment 2A2, crosses 5 residence/business parcels  Crosses or is adjacent to 3 planned developments  No conflict with existing land use plans	In Segment 2A3, adjacent to 1 residence/business parcel  In Segment 2A3, crosses 0 residence/business parcels  Crosses or is adjacent to 3 planned developments  No conflict with existing land use plans	In Segment 2A4, adjacent to 2 residence/business parcels  In Segment 2A4, crosses 1 residence/business parcel  Crosses or is adjacent to 5 planned developments  No conflict with existing land use plans	In Segment 2A5, adjacent to 0 residence/business parcels  In Segment 2A5, crosses 5 residence/business parcels  Crosses or is adjacent to 3 planned developments  No conflict with existing land use plans	In Segment 2B, adjacent to 16 residence/business parcels  In Segment 2B, crosses 2 residence/business parcels  Crosses or is adjacent to 4 planned developments  No conflict with existing land use plans	In Segment 2C, adjacent to 0 residence/business parcels  In Segment 2C, crosses 1 residence/business parcel  Crosses or is adjacent to 7 planned developments  Transmission lines violate City of Roseville's adopted policy to preserve visual quality	No

<b>Table 1-1 Summary of Alternative Impacts</b>									
Resource Issue	Impacts	Alternative A1 Impacts	Alternative A2 Impacts	Alternative A3 Impacts	Alternative A4 Impacts	Alternative A5 Impacts	Alternative B Impacts	Alternative C Impacts	No Action
	Loss of prime and unique farmland	24.7 (E)/ 25.8 (W) acres of prime farmland would be removed	24.8 (E)/ 26.7 (W) acres of prime farmland would be removed	30.1 (E)/ 32.1 (W) acres of prime farmland would be removed	32.5 (E)/ 34.7 (W) acres of prime farmland would be removed	28.2 (E)/ 30.2 (W) acres of prime farmland would be removed	18.3 acres of prime farmland would be removed	21.9 acres of prime farmland would be removed	
<b>Noise<sup>3</sup></b>									
	Potential effects from average day-night noise levels	No	No	No	No	No	No	No	No
<b>Paleontological Resources<sup>3</sup></b>									
	Destruction of significant fossils	No	No	No	No	No	No	No	No
<b>Socioeconomics<sup>3</sup></b>									
	Permanently displace existing residences or businesses or physically divide a community	No	No	No	No	No	No	No	No
	Degradation or over-commitment of existing goods and services to an extent that would limit the sustainability of existing communities	No	No	No	No	No	No	No	No
	Foreclosure of present or proposed land uses as averaged across the study area, including prime and unique farmland	No	No	No	No	No	No	No	No

<b>Table 1-1 Summary of Alternative Impacts</b>									
Resource Issue	Impacts	Alternative A1 Impacts	Alternative A2 Impacts	Alternative A3 Impacts	Alternative A4 Impacts	Alternative A5 Impacts	Alternative B Impacts	Alternative C Impacts	No Action
<b>Soils<sup>3</sup></b>									
	Potential effects from erosion, improper drainage, high water erodibility, steep slopes, and compaction	No	No	No	No	No	No	No	No
<b>Traffic<sup>3</sup></b>									
Substantially increase traffic in relation to existing traffic load and capacity of street system, result in a change of traffic patterns, conflict with alternative transportation programs, cause major traffic delays, and cause physical harm to roads that is not repaired	Short-term effects: Traffic delays during construction	If construction of Segments 2A1 to 2A5 is on the east side, the alignment would cross Highway 99 once near Catlett Road. If construction of these segments is on the west side, the alignment would cross Highway 99 three times: at Catlett Road, at Cross Canal, and at the point corresponding with the eastward selection.					No	No	No
<b>Visual Resources<sup>3</sup></b>									
	Potential long-term visual alteration of existing landscapes, effects to areas of high visual quality or scenic landscapes, and consistency with local and county general plans	No	No	No	No	No	No	Segment 2C2 would conflict with the City of Roseville's visual resource policy	No
<b>Water Resources<sup>3,5</sup></b>									
	Erosion, compaction, and sedimentation or blockage of drainage; introduction of debris, fill, or contamination into surface water or groundwater; damage to irrigation improvements; and depletion of water resources	Western would obtain permits to comply with applicable environmental laws, regulations, the statewide Construction Storm Water General NPDES Permit, and other applicable permit requirements							No

**Table 1-1 Summary of Alternative Impacts**

Resource Issue	Impacts	Alternative A1 Impacts	Alternative A2 Impacts	Alternative A3 Impacts	Alternative A4 Impacts	Alternative A5 Impacts	Alternative B Impacts	Alternative C Impacts	No Action
<b>Wetlands<sup>2,3,7</sup></b>									
Degradation of biological values and wetland functions from excavation, fill, disturbance, or sedimentation; and increased access by humans or invasive species	Short-term effects from construction within wetlands	2.0(E)/2.0(W) acres of temporary disturbance	2.0(E)/2.0(W) acres of temporary disturbance	3.0(E)/3.0(W) acres of temporary disturbance	1.9(E)/1.9(W) acres of temporary disturbance	1.9(E)/1.9(W) acres of temporary disturbance	5.5 acres of temporary disturbance	3.2 acres of temporary disturbance	No
	Long-term effects from structures access roads sited in wetlands	1.1(E)/1.1(W) acres of permanent disturbance	1.1(E)/1.1(W) acres of permanent disturbance	1.8(E)/1.7(W) acres of permanent disturbance	1.0(E)/1.0(W) acres of permanent disturbance	1.1(E)/1.1(W) acres of permanent disturbance	3.4 acres of permanent disturbance	1.6 acres of permanent disturbance	No

Source: Western 2003, Western 2007

<sup>1</sup> Western would implement Environmental Protection Measures (EPMs) in accordance with air district requirements to minimize impacts.

<sup>2</sup> Western would coordinate with US Fish and Wildlife Service (USFWS) as part of Section 7 consultation and with California Department of Fish and Game.

<sup>3</sup> Western would adhere to EPMs to minimize impacts.

<sup>4</sup> Western would coordinate removal of elderberry bushes with USFWS.

<sup>5</sup> Surface water and riparian habitat would be spanned and wetlands avoided wherever possible; however, if they could not be spanned or avoided, Western would coordinate with US Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), National Marine Fisheries Service, and USFWS.

<sup>6</sup> Construction in floodplains would require Western to coordinate with USACE, RWQCB, and the California Reclamation Board.

<sup>7</sup> Wetlands include freshwater emergent wetlands and vernal pools

\* Substation upgrades would not be concurrent with transmission line construction.

- NPDES = National Pollutant Discharge Elimination System
- NO<sub>x</sub> = Nitrous oxide
- PM<sub>10</sub> = Particulate matter less than or equal to 10 microns in diameter
- ROG = Reactive organic gasses
- ROW = Right-of-way
- TCP = Traditional cultural property
- VOC = Volatile organic compounds

(E) = East side of Highway 99

(W) = West side of Highway 99

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**Table 1-2 Comparison of Environmental Impacts of Alternative B, the Preferred Alternative (Segments: 1, 2B, & 3), With Other Alternatives**

Resource Area	No Action	Alternative A1 East	Alternative A1 West	Alternative A2 East	Alternative A2 West	Alternative A3 East	Alternative A3 West	Alternative A4 East	Alternative A4 West	Alternative A5 East	Alternative A5 West	Alternative C
Air Quality	Less	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Greater
Biological Resources	Less	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land	Less: Vernal pools & wetlands Greater: Rice field habitat & HCP land
Cultural Resources	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Electric and Magnetic Fields	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Environmental Justice	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Floodplains	Less	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Greater	Less
Geology	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Health and Safety	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Land Use	Less	Less: Adjacent to residential/business parcels Greater: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Greater: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Greater: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Greater: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Less: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Less: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Less: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Less: Crosses residential/business parcels Greater: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Less: Crosses residential/business parcels Greater: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Greater: Crosses residential/business parcels Less: Future Development Greater: prime/unique farmland	Less: Adjacent to residential/business parcels Less: Crosses residential/business parcels Greater: Future Development Greater: prime/unique farmland
Noise	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Paleontological Resources	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Socioeconomics	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Soils	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Traffic and Transportation	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Visual Resources	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Water Resources	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal
Wetlands	Less	Less	Less	Less	Less	Less	Less	Less	Less	Less	Less	Less
Public Services	Less	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal	Equal

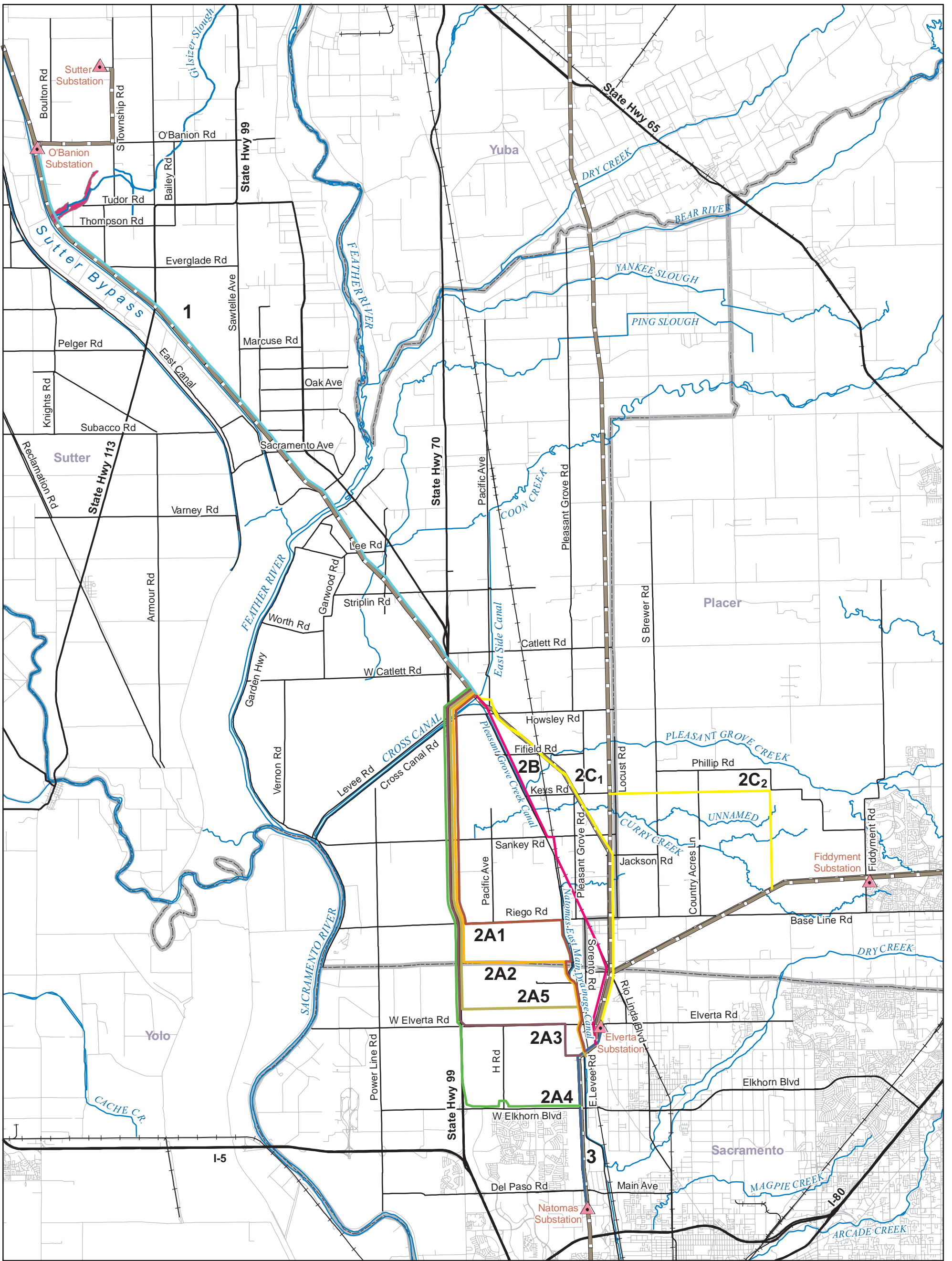
Greater = Impacts of this alternative are greater than impacts of the Preferred Alternative

Equal = Impacts of this alternative are equal to impacts of the Preferred Alternative

Less = Impacts of this alternative are less than impacts of the Preferred Alternative



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**SVS Segment**

<ul style="list-style-type: none"> <li>1</li> <li>2A1</li> <li>2A2</li> <li>2A3</li> <li>2A4</li> <li>2A5</li> <li>2B</li> <li>2C1</li> <li>2C2</li> <li>3</li> </ul>	<ul style="list-style-type: none"> <li>Existing Transmission Line</li> <li>Substation</li> <li>Road</li> <li>Railroad</li> <li>Watercourse</li> <li>CDFG Significant Area</li> <li>County</li> </ul>
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**Sacramento Area Voltage Support Supplemental EIS and EIR**

**Figure 1-1**

**Proposed Project Alternatives**

1:140,000

2 1 0 2

Miles



## 2.0 Public and Agency Comments

## CHAPTER 2.0 PUBLIC AND AGENCY COMMENTS

Western received oral comments from ten people and written comments from two people at the public forum hearings. Additionally, Western received written comments from 44 commenters via mail, e-mail, and facsimile outside of the public forum hearings, but within the public comment period. Comments were received from a total of 56 agencies, organizations, and individuals. To evaluate comments received, Western grouped them in four general categories:

- Governmental Agencies (including Federal and State) and Native American Tribes
- Community and development organizations
- Individuals and landowners
- Public forum comments (oral and written)

Chapter 2 provides a list of public and agency commenters and Western's responses to comments. Appendix A provides copies and verbatim transcripts of all comments received.

### 2.1 LIST OF COMMENTERS

#### 2.1.1 Governmental and Tribal Agencies

- U.S. Department of the Interior (Patricia Sanderson Port, Regional Environmental Officer and Vijai N. Rai, Team Leader, Natural Resources Management)
- U.S. Environmental Protection Agency (Nova Blazej, Manager)
- U.S. Fish and Wildlife Service (Cay Goude, Assistant Field Supervisor)
- California Department of Fish and Game (Kent Smith, Acting Regional Manager)
- California Department of Transportation (Brian Goldman, Utility Coordinator)
- California Department of Transportation (Sukhvinder [Sue] Takhar, Interim Chief)
- California Department of Water Resources (Christopher Huit, Staff Environmental Scientist)
- County of Placer (Michael J. Johnson, AICP, Director of Planning)
- Sacramento Metropolitan Air Quality Management District (Peter Christensen, Strategic Planning Division)
- Sacramento Regional County Sanitation District (Humera Arshad, Assistant Engineer)

- City of Roseville (John Sprague, Assistant City Manager)
- United Auburn Indian Community of the Auburn Rancheria (Greg Baker, Tribal Administrator)

#### 2.1.2 Community and Development Organizations

- Brookfield California Land Holdings, LLC (John Norman)
- California Indian Heritage Council (Randy Yonemura, Principal Agent)
- CEEL Land Corporation (Warren Chang, Manager)
- Diepenbrock Harrison (Karen L. Diepenbrock)
- Lechan Land Corporation (Warren Chang, Manager)
- Measure M Owner's Group (represented by George M. Carpenter, Jr., Attorney)
- The Natomas Basin Conservancy (John R. Roberts, Executive Director)
- Regional University Specific Plan (represented by Megan M. Quinn, Attorney with Remy, Thomas, Moose and Manley, LLP)
- Richland Planned Communities, Inc. (Todd Chambers)
- Sierra Vista Specific Plan (represented by Megan M. Quinn, Attorney with Remy, Thomas, Moose and Manley, LLP)
- Yekun Lim & Inok Lim Revocable Trust (Warren Chang)

#### 2.1.3 Individuals and Land Owners

- Joan Allen & Sharon Musto (represented by K. Kemper, Attorney with Law Offices of George E. Phillips)
- Trudy Bianchi (represented by Mark J. Reichel, Attorney)
- Melvin Borgman
- Bill L. & Sharon Brown
- C. Morrison Ranch (Charlotte Borgman, Partner)
- John & Grace Chang
- James Crabtree
- Richard L. & Judith Driggs
- Jean Frederick )

- Thomas Gianella
- Richard G. & Lois Hendrix
- Richard Hendrix
- Haesun Koo
- James L. Kouretas
- Sung Woo & Hyun Joo Lee
- Ernest E. Morgan
- J. Richter
- Tina Royer
- Jack & Merilyn Scheidel
- La Verne & Molly Scheidel
- Sills Farms, Inc. (Edward M. Sills, Vice President)

## 2.1.4 Public Forum

### 2.1.4.1 Written Comments

- Northern California Power Agency (Nannette Engelbrite, Senior Contract Specialist)
- La Verne Scheidel

### 2.1.4.2 Verbal Comments

- Molly Scheidel
- La Verne Scheidel
- R.C. Wallace
- Norman James
- Shirley Wallace
- Tom Gianella
- Robert Wallace
- Ed Willey
- Bill Brown
- John Norman

## 2.2 COMMENT SUMMARIES AND RESPONSES TO COMMENTS

### 2.2.1 Governmental and Tribal Agency Comments (Category A)

#### Response to Comment Set A.1

##### U.S. Department of the Interior

- A.1-1 *The commenter initially requested an extension of their deadline to submit comments, which was granted. Subsequently, the commenter responded that they did not have any comments.*

It is noted that DOI does not have comments on the Draft SEIS and EIR.

#### Response to Comment Set A.2

##### U.S. Environmental Protection Agency

- A.2-1 *The commenter provides several statements to summarize comparisons of impacts among the proposed Project alternatives and states a preferred set of alternatives. The commenter also states that aquatic impacts would be greatest for Alternatives B and C.*

While the commenter is correct in stating that estimated air impacts are greatest for Alternative C, it should be noted, as shown in Table 4.1-6 of the Draft SEIS and EIR, that emissions would be lowest for Alternative B.

The statements regarding vernal pools and wetlands are correct. However, Alternatives A1 through A5 would generally have the greatest impacts to rice fields, which provide habitat for the Federally threatened giant garter snake. Western also wishes to clarify that the ROW crossing estimates include the full width of ROW and do not reflect estimated disturbances associated with the intermittent placement of transmission line structures. Western regrets that this difference was not more clearly differentiated in Table B-1 of the Draft SEIS and EIR, entitled Summary of New Disturbances and Impacts to Various Resources. The table title was modified to “Summary of Proposed Project Specifications, Disturbances, and Impacts to Various Resources within the ROW” in order to clarify this and is provided in Appendix B of the Final SEIS and EIR. In the case of Alternative A3, Western estimates that long-term disturbance to vernal pools would be 0.8 acres, not 9.2 acres. Long-term disturbance includes structures and access roads.

Western appreciates the commenter calling attention to an error in the document. The text on page 4-114, section 4.17.2.6, Summary of Impacts, of the Draft SEIS and EIR, inaccurately reflects the estimated amount of wetlands crossed by the Alternative B ROW as 29.6

acres with the projected permanent disturbance to emergent wetlands of 3.4 acres. As identified in Table B-1 of the Final SEIS and EIR, Alternative B would cross 19.5 acres and permanently disturb 2.4 acres of emergent wetlands. Further, each of the A Alternatives is estimated to cross 8.1 (rather than 11.5) acres and to permanently disturb 1.0 acres of emergent wetlands. The revised text is provided in section 3.3.3 of the Final SEIS and EIR.

A.2-2 *The commenter indicates a preference for the A Alternatives (A1, A2, A4, and A5) as the Preferred Alternative.*

Western has considered the environmental impacts and has determined that Alternative B is preferable, as noted in section 1.6, Preferred Alternatives, of the Final SEIS and EIR. This decision, as noted in the Council on Environmental Quality's 40 Questions, "involved difficult judgments, particularly when one environmental value must be balanced against another." Western selected Alternative B as the Preferred Alternative because it is the least environmentally damaging while remaining consistent with the purpose and need of the proposed Project. A large portion of Alternative B would be located within or immediately adjacent to an abandoned railroad ROW. Relative to other alternatives, it would have the least impact on existing and planned habitat conservation plan (HCP) areas, fewer impacts to prime and unique farmland, fewer effects on historic Reclamation District 1,000 flood-control features, and it would require the fewest structures, the least new ROW, and the fewest access roads.

A.2-3 *The commenter expresses concern that the proposed Project may adversely affect jurisdictional waters and wetlands by crossing sensitive watersheds, such as the Cosumnes River.*

Western shares this concern and has analyzed these impacts with the best available information, given the lack of access to certain parcels in the study area and uncertainty of final design. Western has established assumptions about aquatic resources and waters of the U.S. based on worst-case scenarios. For instance, Western conservatively estimated disturbance of access roads based on a general assumption that access roads would run the length of the transmission line. In reality, access roads would be limited to the minimum area necessary. Where existing roads or trails can be used, new spur access roads might be required only from those locations to given structures. Because Western has developed the SEIS and EIR early in the process, information on final design is not available. In all cases, avoidance of sensitive aquatic and wetland features will be the guiding direction. Only when the design is complete will it be feasible or possible to precisely determine the exact quantity of disturbance.

In the meantime, analysis of the best information currently available is found in sections 4.2, 4.16, and 4.17 of the Draft SEIS and EIR. Western clarifies that, as noted in Table 4.16-1 of the Draft SEIS and EIR, none of the alternatives would cross the Cosumnes River. The Draft SEIS and EIR contains multiple tables that provide comparative summaries of the short-term and long-term impacts to aquatic and wetland resources for each alternative, including Tables 4.2-1, 4.2-2, 4.16-1, 4.17-2, and 4.17-3. Additionally, Table B-1 has been revised in the Final SEIS and EIR to clearly reflect wetland acreage impacted. Please see Appendix B in the Final SEIS and EIR for the corrected Table B-1.

A.2-4 *The commenter recommends that Western "commit to conduct detailed wetland surveys and wetland delineations upon selection of the preferred alternative and include this information in the SFEIS."*

Western will conduct detailed wetland surveys and delineations as soon as siting is refined and rights of entry are obtained from landowners. This work will not be completed in time to include it in the Final SEIS and EIR.

A.2-5 *The commenter recommends that Western limit operating periods and fence sensitive biological resources.*

Western recognizes the ecological importance and sensitivity of vernal pools in the Central Valley and has committed to several protective measures, including EPMs 22, 23, 25, 29, 63, 92, 93, 99, 101, and 102 in Table C-1, Appendix C of the Final SEIS and EIR. EPM 102 was added in response to this comment and requires fencing around vernal pools and sensitive resources.

A.2-6 *The commenter expresses concerns about the existing air quality for the area and the potential effects of the proposed Project, especially with regard to fine particulate matter.*

Western has coordinated closely with Sacramento Metropolitan Air Quality Management District, Feather River Air Quality Management District, and Placer County Air Pollution Control District regarding air quality impacts from the proposed construction activities. Western understands that air quality, specifically emission of particulate matter, is an important issue in the Central Valley. Additionally, Western understands the commenter's concerns regarding the need for a thorough analysis of PM<sub>2.5</sub>, especially in light of the 2006 National Ambient Air Quality Standards PM revisions.

Chapter 3 of the Final SEIS and EIR includes a discussion of the revised PM<sub>2.5</sub> standards and projected emissions relative to the new standards. In general, for every pound of PM<sub>10</sub> dust created during construction, there are approximately 0.2 pounds of PM<sub>2.5</sub> emissions.

There is generally a one to one relationship between PM<sub>10</sub> and PM<sub>2.5</sub> for tailpipe emissions from construction equipment. EPMs 1 through 14, presented in Appendix C of the Final SEIS and EIR, would significantly reduce PM<sub>10</sub> and PM<sub>2.5</sub> emissions during construction.

## Response to Comment Set A.3

### U.S. Fish and Wildlife Service/California Department of Fish and Game

A.3-1 *The commenters make a statement that the California Department of Fish and Game (DFG) has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitats under the California Endangered Species Act, the Native Plant Protection Act, and other provisions of the California Fish and Game Code.*

Western understands DFG jurisdictions. As a Federal agency, Western would take the substantive requirements of the DFG's responsibility under consideration.

A.3-2 *The commenters indicated that they were unable to locate additional description or analysis of substation modifications beyond that found in the Executive Summary.*

Modifications to the O'Banion, Elverta, and Natomas substations are also described on page 3-22, section 3.4.12, Equipment Additions in Substations, of the Draft SEIS and EIR. Impacts from these additions are included in the overall project analysis and are generally limited to air impacts during construction. The O'Banion, Elverta, and Natomas substations are currently lined with gravel and no new disturbances are expected to occur from the substation modifications. All three substations already exist and are clear of vegetation.

A.3-3 *The commenters state that, while not known to occur in the area, they believe there is potential habitat for Sacramento Orcutt grass, slender Orcutt grass, Colusa grass, and Solano grass.*

Western agrees that these species are not known to occur in the study area. If the USFWS requests rare plant surveys through section 7 consultation, Western will conduct additional surveys as appropriate.

A.3-4 *The commenters state concerns about vernal pool complexes.*

Western supports the effort to maintain large, contiguous areas of uninterrupted vernal pool habitat. Fortunately, transmission line design and construction allow latitude in placement of structures by varying the distances between structures. Western's standard practice is to avoid sensitive resources. Prior to design,

Western will conduct detailed surveys to identify and delineate the locations of vernal pool complexes. During project design and construction, Western will coordinate with USFWS to site and build transmission structures, access roads, and associated facilities to minimize impacts to vernal pools.

A.3-5 *The commenters state that the USFWS is concerned about direct effects to vernal pool fairy shrimp and vernal pool tadpole shrimp as a result of the proposed Project and identify the statement on page 4-25, section 4.2.2.3, which states, "Vernal pools have been known to recover within one to four seasons following disturbance, as long as the hardpan in the soil is not penetrated. Soil disturbance from temporary roads and pulling sites would not be deep enough to damage the impermeable soil layer."*

Chapter 4 of the Final SEIS and EIR includes the reference for the first part of the above statement. Recovery of vernal pools within one to four seasons is documented in the Mitigation Monitoring Report (year 3) for the Solano County Health and Social Services Facility, prepared for Solano County Division of Architectural Services, Fairfield, California (URS Corporation 2004).

Western maintains the latter statement in cases where these activities would require no digging or scraping of the ground surface. If leveling or scraping is needed for these sites, however, the hardpan may be affected. Western agrees with the commenters that placement of monopoles could break the hardpan. Western would place monopole structures in areas outside of and as far away from existing vernal pool complexes as possible to prevent this from occurring.

A.3-6 *The commenters state that an explanation was not provided as to how acreages were calculated for Table 4.2-1 on page 4-24 of the Draft SEIS and EIR and suggest that all vernal pools within 250 feet of ground-disturbing activities could be indirectly affected.*

The numbers in Table 4.2-1 were derived from several sources of the best available information, including the California Natural Diversity Database, orthophotography, and detailed surveys on lands for which right of entry was granted. Western expanded the footnotes to Table B-1 in Appendix B of the Final SEIS and EIR to describe how the disturbance numbers were calculated.

The proposed Project design will not begin until after the Record of Decision (ROD) is issued. Therefore, Western is unable to make precise determinations on impacts. Instead, during detailed Project design, Western will use available information, combined with additional detailed surveys and delineations, to more precisely determine impact acreage and avoidance areas. Western will also conduct detailed surveys after construction to determine actual disturbance and

appropriate mitigation, according to required Project permits.

- A-3-7 *The commenters state that the Draft SEIS and EIR provides “no meaningful discussion regarding the potential for the project to contribute to economic or population growth or the construction of additional housing to the surrounding environment.” They recommend that the SEIS and EIR “examine the relationship between energy supply and land use planning...”*

Land use planning and resultant growth decisions in the greater Sacramento area are under the jurisdiction of local county and city agencies. As noted in sections 1.1 and 2.1 of the Draft SEIS and EIR, studies conducted since 2001 have concluded that the electrical system’s existing transmission lines have reached their maximum power transfer limits for servicing the area’s existing and projected energy needs based upon growth decisions already made by local city and county land use planning authorities. Western is responsible for maintaining and reliably operating the Federal transmission system. Likewise, other Sacramento-area transmission system owners, Load Serving Entities, and utilities must maintain the greater Sacramento-area transmission systems. The SEIS and EIR has clearly defined this effort. SMUD has an obligation to provide electric service to its customers-owners within its service territory and thus responds to growth decisions made by local cities and counties. In order to keep customer rates affordable, electric infrastructure is not planned for or constructed until a clear need is established by actual or forecasted electric system impacts caused by growth. Therefore, the availability of electric capacity does not currently provide a barrier to growth decisions made by local land use authorities in the greater Sacramento area. Rather, the proposed Project is in response to growth decisions already made.

- A.3-8 *The commenters state that the proposed 2A segments “appear to encroach on existing preserves established as mitigation for the Natomas Basin Habitat Conservation Plan (NBHCP).” They are concerned that the proposed Project will negatively impact the NBHCP implementer’s ability to “adequately manage” the preserves and they suggest that aerial spraying of rice fields could be “dangerous or impossible” with the presence of transmission lines.*

Western developed all alternatives to minimize conflicts with habitat conservation plan preserves, including the NBHCP. Every attempt was made to site alternative routes along the perimeter of preserves, typically where preserve access and maintenance roads are currently located. Western recognizes and supports the objectives of the NBHCP and others to manage preserve land for the protection of beneficiary species. Western will work with the Natomas Basin Conservancy (Conservancy) to identify appropriate markers for transmission lines to

reduce impacts to crop-duster operations within the Conservancy.

Crop-dusting operations occur in close proximity to transmission lines throughout California. It is Western’s determination that the risk to crop dusting from the proposed Project would be similar to current crop-dusting operations located near existing transmission lines throughout California and specifically in the Central Valley.

Upon completion of the SEIS and EIR, Western will determine whether to proceed with the proposed Project, and if so, under which alternative. Then, Western will coordinate with preserve implementers affected by the selected alternative to ensure that construction and operation of the proposed Project would minimize interference with any habitat conservation plan.

- A.3-9 *The commenters provide information on the Migratory Bird Treaty Act and suggest that Table 3-3 in the Draft SEIS and EIR should address the potential for raptor collisions with monopoles or power lines.*

Table 3-3, Environmental Protection Measures, beginning on page 3-23 of the Draft SEIS and EIR, is not intended to address impacts but rather to describe measures Western would take to avoid, prevent, and minimize impacts to various resources. Western discusses the potential for raptor collisions on page 4-26, section 4.2.2.3 Impacts from Alternatives of the Draft SEIS and EIR. While the potential for raptor collisions exists, there would be no difference in the likelihood of collisions among the action alternatives.

- A.3-10 *The commenters suggest that Western use Avian Power Line Interaction Committee (APLIC) guidance documents to protect raptors. The commenters further recommend that Western “consider requiring power distributors to use these guidelines in designing primary distribution lines.”*

Western is a member of APLIC and is an industry leader in research and prevention of bird collisions and electrocutions. Western encourages all of its customers and project applicants to prepare an Avian Protection Plan. While Western may be able to influence power distributors to follow the APLIC guidelines by its own example and scientific contributions to their study, Western has no legal authority to require their compliance.

- A.3-11 *The commenters recommend that EPM 54 (Table 3.3 and page 4-22) be revised to require that Western consult with the DFG and, if necessary, obtain an incidental take permit from them.*

Western does coordinate its activities with the DFG and has requested DFG assistance in dealing with wildlife issues, such as burrowing owls, in some of its substations in California. However, as a Federal



agency, Western requests permits from the USFWS to deal with issues pertaining to birds protected by the Endangered Species Act (ESA), Migratory Bird Treaty Act (MBTA), and the Bald and Golden Eagle Protection Act. The acquisition of these permits frequently includes coordination with DFG.

A.3-12 *The commenters recommend that the SEIS and EIR be revised to include a discussion of the potential loss of Swainson's hawk foraging habitat.*

By its nature, a transmission line does not alter habitat in large tracts of land. The long-term effects on habitat of a transmission line are limited to those areas that hold the structures that support the line. Swainson's hawks are known to use transmission line structures for hunting perches and rarely as nesting substrate. Western is aware that DFG is currently funding a study on the Swainson's hawk in California and Western is looking forward to reviewing the results of that study.

A.3-13 *The commenters recommend that the SEIS and EIR be revised to state that Western would consult with the DFG regarding the potential for take of giant garter snakes.*

As required by the Endangered Species Act, Western will consult with the USFWS regarding the proposed action and its effects on the giant garter snake. Western and the USFWS will coordinate with DFG during this process.

A.3-14 *The commenters state that the Draft SEIS and EIR "does not provide adequate measures to lower the project's impact on giant garter snake to below a level that is significant." The commenters recommend "that the SEIS and EIR be revised to include a discussion of the potential loss of aquatic and upland habitat and provide adequate mitigation measures to lower the project's impact below a level that is significant."*

Western has defined significance criteria on page 4-19, section 4.2.2.1, Standards of Significance, in the Draft SEIS and EIR, as follows:

A significant effect on biological resources would occur under the following conditions:

- Loss of habitat or individuals resulting in the listing of, or jeopardizing the continued existence of, any species;
- Loss of habitat or individuals resulting in the decline of its listing status; or
- Introduction or spread of noxious weeds.

Western has analyzed the effects of the proposed Project. Alternatives are estimated to remove from 20.0 to 36.6 acres of rice fields from production in the long term. Western determined that, given the EPMs, the

proposed Project would result in effects below the level of significance. Western will also consult with the USFWS, at which time USFWS will have an opportunity to evaluate the proposed Project and associated EPMs for adequacy in protecting the species. In the meantime, Western would also consider input from the DFG and others who might provide additional measures that could be reasonably and feasibly implemented for the proposed Project.

A.3-15 *The commenters recommend that the SEIS and EIR provide a discussion of the proposed Project's potential to impact the northern harrier, a California species of special concern.*

The project area has suitable habitat for the northern harrier. During site visits in December 2007, northern harriers were sighted in the project vicinity. Western will coordinate with DFG, as appropriate.

A.3-16 *The commenters state that the SEIS and EIR "fails to adequately analyze how the project may affect implementation of the NBHCP." They state that the "successful implementation of the NBHCP is premised on all the area in the Natomas Basin outside of the permit areas remaining undeveloped for the benefit of the covered species." The commenters also state that Western should consider the cumulative effects of habitat loss to the NBHCP.*

Western has determined that its analysis of cumulative effects to special-status species and habitats relative to this recommendation is adequate. Western is satisfied that the scope of analysis of the SEIS and EIR is appropriately focused on the resource, and ultimately, so is any HCP. Western provided appropriate information on page 4-26 in section 4.2.2.5, Cumulative Impacts, of the Draft SEIS and EIR. Additionally, Western will address all cumulative effects resulting from non-Federal actions to Federally listed species in its Biological Assessment (BA) for this project.

As noted previously, Western developed all alternatives to minimize conflicts with HCP preserves, including the NBHCP. Western recognizes and supports the objectives of the NBHCP and others to manage preserve land for the protection of beneficiary species. While construction and operation of the proposed Project would have small disturbances on known HCP resources, Western would offset any actual impacts through mitigation, as required by USFWS. Additionally, USFWS and DFG, according to their respective authorities, would require all other development projects to mitigate habitat loss to less-than-significant levels. Therefore, cumulative impacts to Federally listed species are expected to be less than significant.

A.3-17 *The commenters provide brief information on the proposed Placer County Conservation Plan (PCCP). They encourage Western to coordinate with Placer*

County, the City of Lincoln, and the other PCCP proponents and avoid selecting an alternative that would “preclude the success of a future PCCP.” The commenters state that the SEIS and EIR should be amended to address how Alternative C may conflict with a future PCCP conservation strategy.

As stated previously, Western developed all alternatives to minimize conflicts with HCP preserves, including the PCCP. Every attempt was made to site alternative routes along the perimeter of preserves. On January 10, 2006, Placer County provided Western with proposed and planned projects in the project study area. Western provided Placer County with the Draft SEIS and EIR and received comments dated August 27, 2007 (please see comment set A.8). None of the comments specifically reference the PCCP.

Western will continue to coordinate closely with known HCP proponents and participants, as appropriate, to minimize conflicts.

A.3-18 *The commenters state that the SEIS and EIR should “consider and analyze whether implementation of the proposed Project will result in reasonably foreseeable potentially significant impacts subject to regulation by the DFG... In general, such impacts result whenever a proposed Project involves work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel, including ephemeral streams and water courses. Impacts triggering regulation by the DFG under the these provision of the Fish and Game Code:*

- *Divert, obstruct, or change the natural flow or the bed, channel, or bank of any river, stream, or lake;*
- *Use material from a streambed; or*
- *Result in the disposal or deposition of debris, waste, or other material where it may pass into any river, stream, or lake.*

*“In the event implementation of the proposed Project involves such activities, and those activities will result in reasonably foreseeable substantial adverse effects on fish or wildlife, a Lake or Streambed Alteration Agreement (LSAA) will be required by the DFG. Because issuance of a LSAA is subject to review under the California Environmental Quality Act, the SEIS and EIR should analyze whether the potentially feasible mitigation measures set forth below will avoid or substantially reduce impacts requiring a LSAA from the DFG.”*

Western has determined that none of the alternatives of the proposed Project would result in significant impacts to rivers, streams, or lakes. Western does not anticipate that the proposed Project would result in diverting, obstructing, or changing natural flow or the bed, channel, or bank of any river, stream, or lake; using

material from a streambed; or disposing of or depositing debris, waste, or other material where it may pass into any river, stream, or lake. Western would comply, as appropriate, with all necessary permits.

A.3-19 *The commenters state that the proposed Project “will have an impact to fish and/or wildlife habitat” and requires payment of fees.*

As a Federal agency, Western is generally not subject to state fees. Fees, as applicable, may be provided by SMUD.

A.3-20 *The commenters state that the SEIS and EIR should be revised and recirculated to include additional information on the commenters’ concerns. They encourage Western to coordinate with them early in the planning stages to design a project that minimizes and avoids sensitive resources as much as possible.*

The Final SEIS and EIR addresses USFWS and DFG concerns regarding the proposed Project. There are no changes in the conclusion of the SEIS and EIR. Western will issue and distribute the Final SEIS and EIR according to NEPA and DOE implementing regulations and according to CEQA guidelines, on behalf of SMUD and the City of Roseville. Western will consult with the USFWS according to section 7 of the Federal ESA. Western will also coordinate with other agencies and stakeholders, as appropriate, regarding the proposed Project, the EPMs, and other mitigation measures and efforts.

## Response to Comment Set A.4

### California Department of Fish and Game

A.4-1 *The commenter states that the Draft SEIS and EIR fails to describe wildlife resources and the Project’s impact to wildlife. Additionally, the commenter states that, in their 2002 review of Western’s Voltage Support Project, they raised concerns that are relevant to the current proposal.*

Western reviewed the commenter’s 2002 review and provides the following information.

Documentation from surveys and analysis would be provided on biological resources before conducting ground-disturbing activities. This documentation would describe habitats along the proposed Project route and their importance to both sensitive and economically important wildlife and plants. Further, information about the winter habitat, concentration areas, and roosts of migrating birds protected under the ESA and associated mitigation measures would be discussed in the BA and BO, which would be completed before ground-disturbing activities are conducted. If warranted, Western may install marking devices that have been proven effective to prevent bird collisions with transmission lines.

To the extent practical, construction and maintenance would occur outside the nesting season to avoid impacts to nesting birds, including raptors (approximately mid February through mid July). If towers have active raptor nests, construction would be conducted after young birds have fledged as determined by a qualified biologist. Inactive nests would not be removed from structures unless they posed a safety or reliability hazard. Refer to EPM 24 in Appendix C of the Final SEIS and EIR.

The construction of a double-circuit transmission line may increase the potential for bird collisions. The stacked configuration of conductors and shield wires on the double-circuit structure would increase the number of wires to be avoided by birds. This would be problematic through local and regional flight corridors. The design requirements of a 230-kV transmission line would minimize the likelihood of electrocution of large birds. Further, if collisions occur, Western would provide marking devices to minimize collisions. Reconstructing the existing transmission line would not increase the potential for bird collisions. Spacing of conductors and other equipment would minimize the likelihood of electrocutions of large birds.

Habitat loss in acres and the types of habitats affected by construction of the proposed alternatives are summarized in the “Sensitive Habitat Types” sections on pages 4-13, 4-15, and 4-26 of the Draft SEIS and EIR. Table B-1 of the Final SEIS and EIR summarizes the acres of new disturbance. Additional documentation and analysis would be provided on biological resources from surveys before conducting ground-disturbing activities. Further, information about the impact of the project on habitat loss for species covered by the ESA and mitigation measures would be discussed in the BA and BO, which would be completed before any ground-disturbing activities were conducted. Western’s customary design for a 230-kV transmission line exceeds the suggested practices for minimizing large bird electrocutions found in the APLIC report *Suggested Practices for Raptor Protection on Power Lines* (APLIC 2006).

A.4-2 *The commenter states that the proposed Project is located in an area important for migrant birds. The commenter continues that collision with electric transmission lines is an important source of mortality for migrant birds. During the winter months, fog obscures visibility in the Central Valley, thereby increasing the likelihood of bird collisions with electric transmission lines.*

Once Western decides on whether to proceed, and if so, under which alternative, it would design the project to minimize bird strikes. Western would use APLIC guidelines and best available technology to identify sensitive areas and implement appropriate mitigation. Western would coordinate with the USFWS and DFG, as appropriate.

A.4-3 *The commenter states that, “Despite our previous attempts to raise the issue of bird collisions with (Western), the Draft SEIS and EIR still fails to discuss this significant impact.”*

Western is aware of previous letters from DFG regarding bird collisions. Western discusses bird collisions on page 4-23, section 4.2.2.3, Impacts from Alternatives, of the Draft SEIS and EIR. As stated previously, Western has determined significance criteria for biological resources on page 4-19, section 4.2.2.1 of the Draft SEIS and EIR. Western has also determined that the impacts from bird collisions as a result of the proposed Project would not result in loss of habitat or individuals resulting in the listing of, or jeopardizing the continued existence of, any species, or loss of habitat or individuals resulting in the decline of their listing status. Western’s standard practice for minimizing bird collisions is to mark lines with the best currently available technology where the lines cross local and regional flight corridors. These are usually areas that birds regularly use to move between roosting and feeding grounds. They might include rivers, streams, or low passes in foothills or mountains. Migrating birds tend to follow similar pathways, but these flights are usually at elevations much higher than the tallest wire on a transmission line. Further information about the winter habitat, concentration areas, and roosts of migrating birds protected under the ESA and associated mitigation measures would be discussed in the BA and BO, which would be completed before ground-disturbing activities were conducted. If warranted, Western would install marking devices that have been proven effective to prevent bird collisions.

A.4-4 *The commenter recommends that the Draft SEIS and EIR be revised to include a discussion of the proposed Project’s effect on migrant birds, including the location of the various alternatives and their relative proximity to areas that are important winter habitat, concentration areas, or roosts for waterfowl or other migratory species.*

See response to comment A.4-2. Additional documentation from surveys and analysis would be provided on biological resources before conducting ground-disturbing activities. This documentation would describe habitats along the proposed Project route and their importance to both sensitive and economically important wildlife and plants.

A.4-5 *The commenter recommends that the proposed Project be designed to minimize bird strikes and provide mitigation to reduce impacts below a level that is significant.*

See response to comment A.4-2.

A.4-6 *The commenter states that almost all of the segments traverse areas that are farmed in crops that are currently available as seasonally flooded agricultural*

habitat for a variety of migrant waterfowl. The commenter goes on to state that the construction of the new transmission lines would create a collision hazard for migrant birds and affect the habitat quality of the lands along the ROW; habitat quality under the new transmission line would decline significantly. The commenter recommends that the Draft SEIS and EIR be revised to address the loss of habitat resulting from construction of the new transmission lines.

See response to comment A.4-2 regarding bird collisions. Additionally, Western has developed EPMs 17 and 18 to minimize habitat loss and degradation. Western is bound by the requirements of the DOE MOU with USFWS regarding the MBTA and Executive Order (EO) 13186.

- A.4-7 *The commenter states that the Draft SEIS and EIR fails to adequately address the potential for take of the Swainson's hawk. It recommends that the SEIS and EIR include a requirement that preconstruction surveys be conducted to determine the presence of nesting Swainson's hawks and, if present, to consult with DFG.*

Sections 4.2.2.2 and 4.2.2.3 of the Draft SEIS and EIR address impacts to Swainson's hawks and other nesting birds. Even with implementation of EPMs 51-55, Western has determined that there may be the potential for take of Swainson's hawks. As identified in EPM 51, detailed preconstruction surveys would be conducted to determine if active Swainson's hawk nest sites occur within 0.5 mile. EPMs 52 through 56 reduce the impacts to these sensitive resources. As stated previously, Western would coordinate with DFG regarding proposed Project activities to minimize impacts to the State-protected species. Additionally, Western is bound by the requirements of the DOE MOU with USFWS regarding the MBTA and EO 13186.

- A.4-8 *The commenter suggests that the SEIS and EIR be revised to include a provision for coordinated consultation with USFWS and DFG for dual-listed species.*

As stated above, Western does coordinate its activities with the DFG and has requested DFG assistance in dealing with wildlife issues, such as burrowing owls, in some of its substations in California. Western requests permits from the USFWS to deal with issues associated with birds protected by the Endangered Species Act, Migratory Bird Treaty Act, and the Bald and Golden Eagle Protection Act. The acquisition of these permits frequently includes coordination with DFG.

- A.4-9 *The commenter states that the project "will have an impact to fish and/or wildlife habitat" and requires payment of fees.*

As a Federal agency, Western is generally not subject to State fees. Fees, as applicable, may be provided by SMUD.

## Response to Comment Set A.5

### Department of Transportation

- A.5-1 *The commenter states that SMUD should consider "future growth of Highway 99".*

Western is aware of plans to expand Highway 99 and took these into consideration in the Draft SEIS and EIR. Western provided information on all planned and proposed developments in the vicinity of the proposed Project in the Draft SEIS and EIR. Western has coordinated and will continue to coordinate with appropriate local and regional municipalities, planning departments, districts, developers, and others.

- A.5-2 *The commenter states that SMUD should consider the two interchange projects along Highway 99 (Riego Road and Elverta Road).*

See response to comment A.5-1.

- A.5-3 *The commenter recommends that SMUD should follow all Caltrans requirements for overhead utilities in the design of power line alignment.*

Western will meet with Caltrans to review design specifications prior to construction and will incorporate Caltrans requirements for overhead utilities crossing highways and freeways.

## Response to Comment Set A.6

### Department of Transportation

- A.6-1 *The commenter recommends that SMUD should consider future development along the Highway 99 corridor.*

See response to comment A.5-1.

- A.6-2 *The commenter recommends that SMUD provide for all Caltrans requirements for overhead utilities.*

See response to comment A.5-3.

## Response to Comment Set A.7

### Department of Water Resources

- A.7-1 *The commenter recommends that Western evaluate whether the proposed Project encroaches on an adopted flood control plan and if so, an encroachment permit will be required.*

Western appreciates the information provided by DWR.

Should a route be selected that falls within the Reclamation Board's designated floodways, Western will obtain an encroachment permit from the

Reclamation Board and will meet with DWR to ensure compliance with applicable regulations prior to construction.

Comment noted.

## Response to Comment Set A.8

### County of Placer

- A.8-1 *The commenter states that Segment 2C2 is inconsistent with the County's and region's possible long-term plans for the Placer County area.*

Western developed all alternatives to minimize conflicts with existing and proposed land use plans, including the Placer County General Plan. Every attempt was made to site alternative routes along roads and plan perimeters. Western determined that Alternative C would not preclude or significantly reduce future development in the area.

- A.8-2 *The commenter states that transmission lines are inconsistent with the Regional University project that is currently proposed for this area.*

Western is aware of siting requirements (i.e., 5 CCR Section 14010[c]) for schools. The placement of the transmission line would not, however, preclude planners from designing these facilities. Western will site all 230-kV routes at least 150 feet from existing schools.

- A.8-3 *The commenter expresses concerns about extremely low frequency (ELF) magnetic fields, such as those originating from electric power transmission lines, and their relationship with adverse health effects.*

Research has shown considerable uncertainty about ELF and health effects, as noted in Western's analysis in section 4.4, Electric and Magnetic Fields. As described, beginning on page 4-36, section 4.4.2.3, Impacts from Alternatives in the Draft SEIS and EIR, the medical and scientific communities generally agree that the available research evidence has not demonstrated that electric and magnetic fields create a health risk. They also agree that the evidence has not dismissed the possibility of such a risk.

For this proposed Project, transmission lines would not pass within 150 feet of existing school sites. The closest sensitive receptor would be Elverta Joint Elementary School, which is located approximately 1,000 feet from the termination of Segment 2C2. In general, at a distance of approximately 300 to 1,000 feet from a transmission line, the magnetic field reaches background levels (the naturally occurring level); therefore, the elementary school would not experience new electric and magnetic field emissions from the proposed Project.

- A.8-4 *The commenter expresses support for any alternative other than Alternative C.*

## Response to Comment Set A.9

### Sacramento Metropolitan Air Quality Management District

- A.9-1 *The commenter states that despite implementation of EPMs, construction-related NO<sub>x</sub> emissions presented in Table 4.1-7 would remain significant in months 2, 3, and 4. The commenter recommends payment of an off-site mitigation fee to reduce impacts to less than significant and provides the fee amount, based on estimates provided in Table 4.1-7 of the SEIS and EIR. The commenter recommends the mitigation payment be included as an EPM.*

Western will coordinate with all appropriate air districts, including the Sacramento Metropolitan Air Quality Management District, as project design and scheduling are more thoroughly developed and prior to construction. EPM 1 in Appendix C of the Final SEIS and EIR states that, "Western would adhere to all requirements of those entities having jurisdiction over air quality matters and obtain any permits needed for construction activities." A commitment to pay required mitigation fees will be documented in Western's Mitigation Action Plan, as appropriate.

## Response to Comment Set A.10

### Sacramento Regional County Sanitation District

- A.10-1 *The commenter states that all design and construction activities in proximity of the Upper Northwest Interceptor shall be coordinated with the Sacramento Regional County Sanitation District (SRCSD) to minimize conflicts.*

Western appreciates the SRCSD's comment, is aware of the Upper Northwest Interceptor Project, and would coordinate with SRCSD as appropriate.

## Response to Comment Set A.11

### City of Roseville

- A.11-1 *The commenter states that the Sierra Vista Specific Plan (SVSP) planning area identified in Figure 4.9-3 of the Draft SEIS and EIR extends an additional 250 feet west of the shown boundary. Additionally, the commenter states that Alternative (Segment) 2C2 would make planning efforts more difficult by imposing constraints for sensitive land uses related to powerline setback requirements, reducing developable land, complicating planning for regional transportation facilities, dividing the SVSP, and being adjacent to the Creekview Specific Plan. The commenter points out that the Draft SEIS and EIR has identified that the proposed Project will conflict*

with the City of Roseville's General Plan Policy vision element and is, therefore, a significant effect.

The referenced figure has been amended to reflect the additional planning area 250 feet to the west and is presented as Figure 3.3-1 in Chapter 3 of the Final SEIS and EIR. Additionally, Western is aware of current and planned infrastructure projects and development. All alternatives were developed to minimize conflicts with existing and proposed specific plans. Where feasible, alternatives were sited adjacent to the perimeters of development projects; however, in some instances the alternative routes could not feasibly be sited along perimeters of proposed specific plans due to environmental and engineering constraints. Western will make every effort to avoid conflicts under any selected alternative.

Western appreciates the City of Roseville's comment that Alternative C is the only alternative alignment with an identified significant impact.

- A.11-2 *The commenter states that, given the proximity of the project to the City's West Roseville Specific Plan Open Space Preserve, indirect impact mitigation will likely be required by the USFWS. The commenter also suggests that the mitigation ratios and related costs would likely be "higher than normal" because of the area's status as a preserve.*

Western will consult with the USFWS prior to construction of any alternative and will include additional EPMs and mitigation measures as appropriate.

- A.11-3 *The commenter recommends any of the A Alternatives.*

Comment noted.

## Response to Comment Set A.12

### United Auburn Indian Community of the Auburn Rancheria

- A.12-1 *The United Auburn Indian Community of the Auburn Rancheria (UAIC) states its concern "regarding the possibility for discovery of previously unidentified cultural resources and/or subsurface remains, particularly in the case of ground-disturbing activities." The UAIC recommends addition of a mitigation measure to describe activities in the event of a discovery.*

Western has added EPMs 103 and 104 to Appendix C, Table C-1 of the Final SEIS and EIR.

## 2.2.2 Community and Development Organizations (Category C)

### Response to Comment Set C.1

#### Brookfield California Land Holdings, LLC

- C.1-1 *The commenter states that Alternative (Segment) 2B appears to run through their property (parcel numbers 35-080-021 and 35-080-12), which was purchased for habitat mitigation purposes. They go on to state concern that the power lines and related improvements will preclude use of a portion of the land for habitat purposes and result in economic loss if they need to acquire more expensive habitat land to replace what is lost. They state that the land is being actively farmed and any loss of farmable acreage is of great concern as well.*

Western has reviewed Segment 2B in relation to the noted parcel numbers. Segment 2B would not cross parcel number 35-080-021; however, this parcel is within the 1,000-foot study corridor. Segment 2B would cross approximately seven acres of parcel number 35-080-12. The commenter's letter did not give sufficient details on the land purchased for habitat mitigation for Western to fully understand the effects of the proposed Project on habitat mitigation. The type of habitat mitigation may dictate whether it is compatible with transmission lines. It is Western's experience that transmission lines are generally compatible with many types of mitigation habitat and farming operations because of the relatively small footprint of transmission lines. For any alternative selected, Western would acquire easements by providing compensation to the landowner based on the fair market value of the land. The highest and best use of the land is considered in the appraisal of the land and easement.

The ROW will continue to be available for compatible uses such as farming and habitat. These uses and comparisons with similar properties and their values would be taken into consideration when negotiating compensation.

- C.1-2 *The commenter states that they need to know precise power line access and structure design details.*

Appendix C in the Draft SEIS and EIR provides detailed aerial photomaps of the proposed Project route alternatives. Section 3.4 in the Draft SEIS and EIR provides details on the design specifications (specifically see section 3.4.2 and Figure 3.1-13). The final design of the project will not be completed until after Western issues a ROD. In the meantime, ROW, structure, and access road locations have not been finalized. Western will use existing access roads to the extent possible.

C.1-3 *The commenter states that they need to know what concerns resource agencies have about whether full mitigation credit will be given on lands with power lines.*

Western cannot speak for other agencies. Western recommends that the landowner(s) communicate their concerns and questions directly with the resource agencies.

## Response to Comment Set C.2

### California Indian Heritage Council

C.2-1 *The commenter expresses concerns regarding the impact of the project on cultural resources and traditional cultural properties (TCPs). It requests formal consultation regarding project processes, development of an administrative plan, and site survey parameters to identify potential cultural sites and TCPs prior to construction.*

As stated in section 4.3.1.3 of the Draft SEIS and EIR, Western contacted the California Native American Heritage Commission (NAHC) to identify appropriate Native American contacts for the study area. The CIHC has not been identified as an appropriate consulting entity as it is not a Federally recognized tribe. Western will continue to consult with tribes throughout the process and make every effort to protect cultural and sacred resources.

## Response to Comment Set C.3

### CEEL Land Corporation

C.3-1 *The commenter registers its “strong opposition” to Western’s proposed route along Elverta Road, where the power lines “will severely impact the development of the Natomas Joint Vision area by reducing developable acreage, creating negative visual impacts and interfering with the proposed interchange at Highway 99 and Elverta Road.”*

To the extent possible, Western developed alternatives to use existing roads and project perimeters to minimize land use and visual impacts. Western will work with the cities and counties to avoid and further minimize conflicts with other planned and proposed infrastructure projects. Although parcel numbers 201-0080-017 and 201-0200-029 are outside the 1000-foot study corridor and 201-0190-046 is barely within the 1,000-foot corridor, these parcels would not be crossed by the proposed Project. The current available acreage of these three parcels is approximately 216 acres. Western does not expect to acquire any ROW acres along these parcels for the proposed Project.

Additionally, the proposed ROW can be used for open space, landscaping, trails, parks, ball fields, drainage

basins, and other compatible uses required of most developments. Western has determined that transmission lines are compatible with highways and other linear infrastructure projects and installations. As stated in response to comment set A.5, Western will work with Caltrans to ensure that all pertinent Caltrans requirements for overhead utilities crossing highways and freeways are incorporated into the project. Western will meet with Caltrans to review design specifications prior to construction.

## Response to Comment Set C.4

### Diepenbrock Harrison on behalf of Brookfield Land Company

C.4-1 *The commenter requests that Western delete Alignments (Segments) 2A3, 2A4, and 2A5 from further consideration (for reasons listed in their letter and described below).*

Western will retain all A, B, and C Alternatives through the SEIS and EIR process. Inclusion of these alternatives provides for a full, robust, and comparative analysis, allowing Western to make an informed decision.

C.4-2 *The commenter states that homeland security has been identified by Western as a reason for separating these new power lines from the existing ROW. They state that persons seeking to disrupt service could focus on main segments and weakest links. They believe alternatives using existing ROW should be preferred.*

Homeland security was not identified as a reason for the proposed Project or for identifying additional route alternatives. The commenter’s letter leads Western to believe that the use of the word “security” has been confused. For the proposed Project, transmission system security and reliability have been identified as a need. The following is stated on page 1-3 of the Draft SEIS and EIR:

“Security refers to the ability of the electric system to withstand sudden disturbances, such as electric short circuits, or unanticipated loss of system elements such as a substation.”

C.4-3 *The commenter states that Alternatives (Segments) 2A3 and 2A5 conflict significantly with infrastructure planned by the City of Sacramento, the County of Sacramento, Caltrans, and Brookfield Land for development and infrastructure improvements in the Natomas Joint Vision area, and with a Caltrans ROW and a proposed new interchange.*

Western is aware of planned and proposed projects within the study area. Some local and regional developers submitted maps and other pertinent information to assist Western in the project design and alternatives development phase of the proposed Project.

Western considered the planned widening of Elverta Road, the Upper Northwest Interceptor, and other infrastructure projects applicable to all alternatives. See Draft SEIS and EIR page 4-65, Figure 4.9-3; section 4.14.2.5, Traffic and Transportation, beginning on page 4-86; and Table 5-1, beginning on page 5-2, for more details on the proposed infrastructure projects and developments in the area. Note that Figure 4.9-3 in the Draft SEIS and EIR has been revised and is presented as Figure 3.3-1 in Chapter 3 of the Final SEIS and EIR.

Western will work with the city, county, and Caltrans to avoid and further minimize conflicts with other planned and proposed infrastructure projects.

- C.4-4 *The commenter states that “California state law requires that parcels containing school sites be set back substantially from high power lines.” The commenter provided a map of their proposed development and states that avoiding the transmission line for Alternative A3 would be “complicated and potentially detrimental to the schoolchildren as optimal locations are discarded because of power line impacts.” The commenter states that the school districts will need flexibility in locating facilities relative to future surrounding land uses, and power lines will be an “excessively limiting constraint.”*

According to 5 CCR Section 14010[c], the siting requirement for schools considering a location near a 230-kV transmission line is 150 feet from the edge of the transmission line easement to any part of the school property. Western would site all new 230-kV routes at least 150 feet from any existing school. Western calculated the available land use for schools for Alternative A3 after excluding the transmission line ROW and a 150-foot buffer beyond the ROW edge. Of the total 397 acres associated with the proposed Brookfield development (according to the commenter’s letter), 8.3 acres would be used for transmission line ROW, leaving approximately 98 percent of the remaining land available for school siting.

- C.4-5 *The commenter lists several areas as “visual intrusions” for Alternatives A3, A4, and A5, relative to Highway 99, new development, and community separator. The commenter states that homes in every part of these new developments will be up against power lines, which citizens find unsightly and highly objectionable. The commenter states that Western has “cited visual conflicts that exist relative to Alternative [Segment] 2C2; similarly, the visual intrusions into projected new and existing development caused by Alternatives [Segments] 2A3, 2A4, and 2A5 should receive the same deference.”*

As described on pages 4-99 and 4-100, in sections 4.15.2.3, Impacts from Alternatives; 4.15.2.5, Cumulative Impacts; and 4.15.2.6, Summary of Impacts, Western acknowledges transmission lines would affect visual resources for each alternative. Any effect in the short-term is often most noticeable as viewers familiar

with the area recognize a new intrusion on the landscape, similar to any newly constructed facility, building, or home. Over time, transmission lines, as well as these other structures, tend to blend into the landscape, becoming shielded by other new structures and landscaping. Taking this into consideration, Western has determined that none of the alternatives would cause a visual interruption that would dominate a rare, unique, scenic, or sensitive viewshed. Alternative C is the only alternative for which a violation of an existing, formal plan would result, which is a significant effect based on the significance criteria listed in section 4.15.2.1. Western is not aware of other adopted plans or policies applicable to any of the other alternatives. Western would not be precluded from selecting Alternative C, despite this significant effect. If an alternative with a significant effect is selected, Western would implement additional measures to further reduce impacts.

- C.4-6 *The commenter notes that “The City of Sacramento (as well as most urban planners) is a strong advocate for ‘smart growth’, encouraging compact, mixed use development near urban cores, served by transit as well as roadways, with higher densities, and...stable levees.” The commenter states that placing two 230-kV lines through the Joint Vision will have major adverse effects on new development.*

Western supports and endorses “smart growth” principles. To clarify, Western proposes to place a single transmission line carrying two circuits on monopoles (see Figure 3.1-13 of the Draft SEIS and EIR). The size of the development suggested by the commenter would require open space, landscaping, trails, parks, and drainage basins. If properly designed, experience shows that these land uses are also generally considered compatible with transmission line ROWs.

- C.4-7 *The commenter states that there would be much less land for development close to the urban core, thereby reducing densities.*

Western is not aware of any existing or planned urban cores that would be in the vicinity of any of the alternatives. To the extent possible, all alternatives were sited to avoid impacts by placing them along existing roads and at the perimeter of known plans and preserves. Therefore, Western anticipates no adverse effect.

- C.4-8 *The commenter states that power lines would restrict access to new development.*

Transmission lines are built with intermittent structures on the ground. The conductors would be suspended from the transmission structures, which would be located 700 to 1,000 feet apart. Transmission lines would be sited to span roads, and conductors would be at heights well out of reach of permitted vehicles. It is



- Western’s determination that the proposed Project would cause no adverse effect on access.
- C.4-9 *The commenter states that new communities would have diminished appeal because of visual impacts.*
- To the extent possible, Western has sited the alternatives to minimize conflicts with planned and proposed development and infrastructure projects in the study area. To the extent possible, Western sited alternatives to use existing roads and project perimeters to minimize land use and visual impacts. Western is aware that transmission lines can cause visual resource impacts. Western has developed EPMS to reduce visual impacts to less-than-significant levels. Please refer to EPM 97 in Appendix C of the Final SEIS and EIR.
- C.4-10 *The commenter states that the proposed Project will conflict with new infrastructure, such as “roadways, levees, water lines, schools, etc.”*
- See responses to comments C.3-1 and C.4-4.
- C.4-11 *The commenter states that power lines will infringe on views and diminish available acreage for open space.*
- See responses to comments C.4-5 and C.4-9.
- C.4-12 *The commenter states that “Blueprint” communities should be favored and protected from power line encroachment.*
- Western does not predispose which communities should be excluded from power lines or other types of utility infrastructure.
- C.4-13 *The commenter states that Segments 2A3, 2A4, and 2A5 would conflict with the planned community separator at the Sacramento/Sutter County line. The commenter proposes an almost 400-acre lake (approximately 1 mile long and 2.5 miles wide) and the power lines would run through the middle of the lake.*
- Western has reviewed the proposed community separator conceptual maps as provided to Western at its public forum on August 9, 2007. Western believes that transmission lines and open space, including water features, are compatible. For any alternative identified in the ROD, Western would coordinate with agencies having jurisdiction, including appropriate cities and counties, to determine what plans and projects are being considered for approval. Since Western would not proceed with design of the transmission line until after the ROD, Western would be able to work with planners to design the transmission line to minimize conflicts. Western has successfully designed and constructed transmission line facilities adjacent to and over water features such as streams, rivers, and lakes. Since both the final alignment of the transmission line and the proposed lake are not existing facilities, both can be designed to be compatible.
- C.4-14 *The commenter states that the power lines will place a visual intrusion along Highway 99 next to the separator and, in the case of 2A5, through the separator and next to new development on the south for over 2.5 miles. The commenter states that the power lines will diminish the value of the community separator as a community visual amenity.*
- See responses to comments C.4-5 and C.4-13.
- C.4-15 *The commenter states that Segment 2A5 will conflict with land uses on both sides of the alignment, which include habitat and open space to the north, and a lake and homes to the south.*
- Transmission lines are commonly successfully co-located with habitat, drainage facilities, open space, and recreational facilities, including trails and ball fields. A current example of compatible use of transmission lines and a community separator is the community separator between the cities of Dixon and Vacaville, California. In this example, there are several comparable transmission lines co-located with the separator.
- C.4-16 *The commenter states that the configuration of the community separator is not yet known and is actively being determined in the planning process.*
- Western is aware that the configuration of the community separator is conceptual at this point. The proposed Project would not preclude the proposed community separator from remaining an open space area.
- C.4-17 *The commenter states that many citizens are seriously concerned about potential hazards from emissions from high power lines. “These perceived health risks cause community unrest and reduce property values for all nearby property, as many people refuse to live next to power lines. Placing commercial uses along Elverta Road is not a solution: good planning principles argue for locating shopping toward the interior of development where it is accessible to residents by foot and bicycle.”*
- Research is inconclusive regarding a link between adverse health effects and transmission lines. Western acknowledges that the presence of transmission or distribution lines is one factor among many that may affect property values and preference for where one lives. Throughout the greater Sacramento area, developers have successfully used transmission line corridors adjacent to residential areas for required open space, landscaping, trails, parks, and drainage basins.
- C.4-18 *The commenter states that power lines should not bisect existing land ownership and provides examples of properties the commenter indicates could be affected in this way by Segment 2A5.*

The commenter does not provide additional information as to why it feels ownership should not be bisected, how this would result in an adverse effect, or how this criterion would differentiate Alternative A5 from the other alternatives. However, Western understands that if Alternative A5 is selected, the proposed Project would create a 90-degree angle on parcels 201-0120-035 and 201-0110-020.

Wherever feasible, Western sites transmission lines on the perimeter of farmland, planned development, preserves, and other uses to minimize conflicts.

- C.4-19 *The commenter states that Segment 2A5 will negatively impact existing homes located off East Levee Road and, in at least one instance, will place high power lines within 50 feet of a resident's bedroom. Segment 2A3 does the same at Elverta Road.*

The alignments analyzed in the Draft SEIS and EIR are considered preliminary for the purposes of environmental impact analysis. Exact alignment has not been determined and Western will make every reasonable effort to maximize the distance between the transmission line and existing homes, as much as the topography, existing infrastructure, and other factors allow. Western would not locate a transmission line centerline within 50 feet of an existing residence.

- C.4-20 *The commenter states that the Draft SEIS and EIR indicates that there is little variation of environmental impacts among the alternatives. The commenter states, "Given this, alternatives along existing rights-of-way make the most sense and will have the least impact on those living near and in the vicinity of a proposed alignment."*

Western has considered the environmental impacts and has determined that Alternative B is environmentally preferable, as noted in section 1.6, Preferred Alternatives, of the Final SEIS and EIR. This decision, as noted in the Council on Environmental Quality's 40 Questions, "involved difficult judgments, particularly when one environmental value must be balanced against another." Western selected Alternative B as the Environmentally Preferred Action Alternative in part because a portion of it would be located within or immediately adjacent to an abandoned railroad ROW. Relative to other alternatives, it would have the least impact on existing and planned HCPs, fewer impacts to prime and unique farmland, fewer effects on historic Reclamation District 1,000 flood control features, and would require the fewest structures, the least new ROW, and the fewest access roads.

- C.4-21 *The commenter states that Alternatives A3, A4, and A5 should be deleted from further consideration.*

As noted in response to comment C.4-1, Western has retained all alternatives for consideration.

## Response to Comment Set C.5

### Lechan Land Corporation

- C.5-1 *The commenter states its opposition to any power lines on their 320 acres on the north side of Elverta Road. It states that Segment 2A3 goes over the entire southern portion of this land and Segment 2A5 goes through the middle of it and will impact farming operations.*

Western developed all alternatives to minimize conflicts with and impacts to agricultural land. Every attempt was made to site alternative routes adjacent to the perimeters of agricultural farming lands as well as along roads and ROWs.

The currently available acreage of parcel 201-0110-023 is approximately 324.25 acres. The expected ROW acreage needed for Segment 2A3 along this parcel is 7.5 acres. Western has determined that approximately 317 acres would still be available. The proposed ROW can also be used for open space, landscaping, trails, parks, ball fields, drainage basins, and other compatible uses required of most developments.

Western is aware of potential impacts on agricultural land uses and farming operations from the construction and operation of the proposed Project. During preparation of the Draft SEIS and EIR, staff thoroughly analyzed these impacts and developed EPMs to reduce the impacts to less-than-significant levels. See page 4-72, section 4.9.2.3, of the Draft SEIS and EIR for a discussion of potential impacts on farming operations.

- C.5-2 *The commenter states objections because of visual intrusion, reductions in developable land, limitations on access, and greater difficulty in developing.*

Please see responses to comments C.3-1, C.4-5, and C.4-9.

## Response to Comment Set C.6

### George M. Carpenter, Jr., Attorney at Law on behalf of the Measure M Owner's Group

- C.6-1 *The commenter states that Segments 2A1, 2A2, 2A3, 2A4, and 2A5 run through the heart of the Sutter Pointe Plan area; Segment 2B runs along the eastern boundary. The commenter encourages the selection of Alternative C.*

Comment noted.

- C.6-2 *The commenter states that "the Draft SEIS and EIR fails to properly characterize the status of the south Sutter County land uses." The commenter states that*

*"Sutter Pointe is more than just a speculative land development project; it has voter approval and specific*

land uses already set forth. The entire impact analysis of the Draft SEIS and EIR should be redone to reflect accurately the future planned land uses in south Sutter County. The impacts of SVS Segments 2A1, 2A2, 2A3, 2A4, 2A5, and 2B have potentially significant and unavoidable impacts to planned residential land uses in south Sutter County.”

Western is aware of the proposed Sutter Pointe project and provided appropriate analysis, listing it as a proposed development and avoidance area in the Draft SEIS and EIR. Western based its analysis of significance on whether the proposed Project would “conflict with approved and/or adopted land use plans and goals of the community or area in which they are located, including open space designations or other types of areas designated for preservation.” While the Sutter Pointe Plan has been approved by voters and “has specific land uses already set forth,” its Draft EIR has not been released and Sutter County has not given final approval. Western commends the participants who have developed the Sutter Pointe Specific Plan and acknowledges the comprehensive planning that went into this effort. Nonetheless, the Sutter Pointe Plan is one of several developments in varying stages that could affect or be affected by the proposed Project. It would be impractical, if not impossible, to guarantee the final outcome of any of these proposals. Given the known information about the proposed Sutter Pointe Plan, Western sited the proposed Project, to the extent possible, along boundaries and perimeters. In response to known concerns over planned development in the areas along the east side of Highway 99, Western added alternatives to consider the west side of Highway 99. With the information available, Western determined that Alternatives A2, A3, A4, A5, and B are compatible with known planned development and that impacts for land use would be less than significant. Western will continue to work with appropriate cities and counties to avoid and further minimize conflicts with any affected planned or proposed infrastructure projects.

C.6-3 *The commenter describes the proposed Sutter Pointe Town Center as a “walkable, mixed-use, area of the Sutter Pointe community” located near the southeast corner of Highway 99 and Riego Road. The commenter states that Segments 2A1, 2A2, 2A3, 2A4, and 2A5, with their setbacks, conflict with residential and commercial land uses, and visual impacts would “compel changes to our land use plan, which would in turn compel changes to all of our nearly complete master infrastructure planning.” The commenter states that these potential impacts should be evaluated in the Draft SEIS and EIR.*

In reviewing the Sutter Pointe Conceptual Land Use map, dated March 15, 2007, Western notes that the proposed 2A Segments east of Highway 99 would predominantly cross lands shown as “parks and open space” with a small area shown as “commercial retail.” To the west of Highway 99, the proposed Project would cross lands shown as “employment” and “commercial

retail.” Since detailed improvement plans have not been developed to date, Western believes these are compatible uses along with infrastructure needs. Western has determined that the impacts of the 2A Alternatives located on either the east or west side of Highway 99 would be less than significant (see section 4.9.2.3 of the Draft SEIS and EIR). Upon making its final decision after issuing a ROD, Western will work with appropriate cities and counties to avoid and further minimize conflicts with any affected planned or proposed infrastructure projects. In the meantime, Western welcomes discussions on how best to avoid and minimize effects to proposed development projects.

C.6-4 *The commenter states that there is an approved Project Report and a pending Supplement Project Report for an interchange at Highway 99 and Riego Road. The commenter states that the Draft SEIS and EIR should evaluate the impacts of Western’s proposed Project to ensure it does not conflict with the interchange facility.*

Western has consulted and will continue to consult with Caltrans regarding planned and proposed infrastructure projects. As noted above, Western has considered this project in the Draft SEIS and EIR, but it would be premature to consider it an approved project. Transmission line design is flexible to accommodate shifts in siting locations. Western has determined that the proposed Project would be compatible with planned and proposed transportation improvements. Please also see responses to comment set A.5.

C.6-5 *The commenter states that the Sutter Pointe Plan identifies residential land uses on the east side of the plan area where SVS Segment 2B crosses Sankey Road. The commenter states that the Draft SEIS and EIR should evaluate the impacts of Segment 2B on the planned residential land uses.*

Alternative B would be located on the east side of Pleasant Grove Creek Canal, the opposite side of the proposed Sutter Pointe Plan. Alternative B would not cross or result in any land-disturbing activities relative to the proposed Sutter Pointe Plan. Future residents of the proposed Sutter Pointe Plan may be able to see the transmission line from their homes. The Draft SEIS and EIR correctly identified that potential impacts, including visual, to the development projects would be less than significant.

C.6-6 *The commenter states that the draft Sutter Pointe Specific Plan contains policies that would specifically prohibit the 2A segments.*

Western appreciates the proposed policies from the commenter; however, the plan is in the concept phase and has not been adopted. The alternatives were developed with the most recent laws, ordinances, regulations, standards, and plans provided by the counties and cities. Western found that the proposed

Project is consistent with existing zoning, ordinances, and policies for the A Alternatives.

## Response to Comment Set C.7

### The Natomas Basin Conservancy

C.7-1 *The commenter states that the Draft SEIS and EIR “fails to take into consideration the relative impact upon Biological Resources (particularly upon the Giant Garter Snake and the Swainson’s Hawk) of Alternative A as compared to Alternatives B and C.”*

Western has determined that it provided an adequate comparative analysis of biological resources, including the giant garter snake and the Swainson’s hawk, based on the best available information in the Draft SEIS and EIR. Pertinent comparative information is provided in Tables 4.2-1, Acres of Sensitive Habitat and Area of Disturbances Associated with Project Routes; 4.2-2, Sensitive Habitats and Supported Special-Status Species, on pages 4-24 and 4-25; and Table B-1, Summary of New Disturbances and Impacts to Various Resources, of the Draft SEIS and EIR. The latter table can also be found in the Final SEIS and EIR as Table B-1 in Appendix B; Table B-1 is now called “Summary of Proposed Project Specifications, Disturbances, and Impacts to Various Resources within the ROW.”

C.7-2 *The commenter states that “Western should specifically discuss and analyze the species-protective role of the Conservancy to afford the public and decision-makers the opportunity to make the most prudent selection among the available alternatives.”*

Western provided information on the NBHCP and Conservancy to a similar level of detail as other applicable habitat conservation plans (i.e., Placer County Conservation Plan). Western considered the existing habitat conservation plan in its determination that Alternative B is the Environmentally Preferred Action Alternative. Please see Chapter 1 of the Final SEIS and EIR for further details on the public and agency involvement process for the proposed Project. If Western ultimately chooses an alternative that affects any HCP, it would coordinate with the USFWS and appropriate participants to comply with the HCP and minimize impacts.

C.7-3 *The commenter states that “all of the approximately 54,000 acres in the Natomas Basin which are not permitted for present or eventual urban uses are deemed to be available as potential mitigation land to offset the impacts of such urban development on covered species.”*

Western does not intend to preclude the use of land within the Basin from mitigation efforts. Western plans to install monopoles for the transmission line, each of which would have a permanent footprint of approximately 30 square feet. Western would use

existing access roads whenever practical. Under Alternative A-East (the worst-case scenario alternative for the Conservancy), the Conservancy would maintain approximately 99.9 percent of the long-term available mitigation land. It should be noted that the land within the ROW could continue to be used for farming, habitat, and open space, and would be protected from future development. Western believes this land would continue to be available as mitigation lands.

C.7-4 *The commenter states that its responsibilities are detailed in the NBHCP, the Biological Opinion, the Record of Decision, and other publicly available documents. The commenter states that “these documents, together with a summary of consultations should be described and analyzed in detail in the DEIS/EIR, as such discussions and analysis should inform selection of the preferred alternative route.”*

Western is aware of and has reviewed these documents and records and has referenced the NBHCP and the Conservancy in the Draft SEIS and EIR. Western acknowledges the important objectives of the NBHCP, the role of the Conservancy as the Plan Operator, and the value of these documents as information for managing these lands. Rather than further describing and analyzing these public documents, Western references them in whole as important tools, which could be applicable to the A alternatives. If an alternative within the NBHCP is ultimately selected, Western would coordinate with agencies, as appropriate, to adopt and comply with guidelines, practices, and requirements.

C.7-5 *The commenter states that “the analysis of the Alternative A routes, which traverse rice fields owned and managed by the Conservancy may impact the Giant Garter Snake to a greater extent than discussed in the DEIS/DEIR.” The commenter states that “extensive materials prepared by the Conservancy...have apparently not been reviewed by Western during the preparation of the DEIS/DEIR... If such materials have been reviewed, those materials have not been discussed in the environmental document and are not cited in the references section of the document.” The commenter continues, “As reflected in such materials, the Conservancy has gone to great length to develop land use methodologies (particularly rice field land use methodologies) which mitigate impacts upon the Giant Garter Snake and other terrestrial species of concern. These methodologies should have been studied and the potential mitigations which they yield should have been considered for adoption”.*

Western reviewed the Final NBHCP, and the reference section of the Final SEIS and EIR (Chapter 4) has been updated to include the NBHCP Biological Opinion.

Western has conducted appropriate analysis on the impacts of the proposed Project to giant garter snake and has determined that, given the proposed Project

description and the EPMs, there would be no significant impacts as a result of any of the alternatives. Even though no significant impacts were found, Western will work with the Conservancy to identify additional and appropriate mitigation from the NBHCP Biological Opinion to further reduce any adverse effects to sensitive biological resources.

C.7-6 *The commenter states that the Draft SEIS and EIR “does not adequately consider the potential impact of the structures to be constructed as elements of the Project (including lines and cables) upon the Swainson’s hawk, which is a soaring forager.” The commenter states that “Based on the Conservancy’s twelve years of experience, we believe that conflicts between the hawk and the physical facilities which make up the Project will be more significant than is described and analyzed in the DEIS/DEIR.” The commenter states that “the extensive reports and analyses prepared in conjunction with the Conservancy’s Annual Reports would be of help to Western and the public in understanding the Project and mitigating its potential impacts.”*

Western appreciates the commenter’s experience and the work it has done through its reports and analyses. Western’s experience includes funding and conducting research, implementing mitigation and prevention measures, designing transmission lines, contributing feedback on product (diverters, markers) development, and developing programs, practices, and policies to minimize avian interactions with utility installations. Western is an active member of APLIC.

Among other comparative analyses in the Draft SEIS and EIR, page 4-22, sections 4.2.2.2, Environmental Protection Measures, and page 4-23, section 4.2.2.3, Impacts from Alternatives, address impacts to Swainson’s hawk and other nesting birds. With implementation of EPMs 24, 51-56, and 102, Western has determined that there would be minimal potential for take of Swainson’s hawk. Western also believes that providing the more detailed information from these reports, analyses, and Conservancy annual reports would not result in a change in determination of significance.

C.7-7 *The commenter states that the Draft SEIS and EIR “may understate the risks of the Project to aerial operations in support of agriculture.” The Conservancy states that “the Health and Safety section should include complete information and analysis regarding the potential impact of the Project upon aerial applications of seeds and crop protection on the rice fields it will traverse.” The Conservancy notes that if they “are obliged to substitute ground applications for aerial applications due to safety considerations, the potential adverse budgetary impacts could be substantial” and “could undermine the Conservancy’s long-term Finance Model, creating a threat to the viability of the NBHCP itself.”*

Analysis of aerial application of seed and pesticides is discussed on page 4-72, section 4.9.2.3, Impacts from Alternatives, in the Draft SEIS and EIR. This discussion provides details on the safety issues associated with crop-dusting operations near transmission lines. Utilities currently have numerous transmission lines operating within agricultural lands throughout California. Many of these lands currently use aerial spraying on a regular basis. Western would site transmission lines along roads, sections, and adjacent to other features such as canals, levees, and utility ROWs to the extent possible. Marking devices would be installed for areas determined necessary to make lines more visible. Farming operations within the Conservancy would be expected to continue to be economically viable using aerial spraying.

C.7-8 *The commenter questions the accuracy of the statement (below) in the Draft SEIS and EIR, stating that they “consider this to be flatly incorrect.” The Conservancy states that for reasons outlined in their letter, they believe it “would not be reasonable to conclude that Alternative A would result in no loss of habitat.” The statement is found on page 4-27, section 4.2.2.5, Cumulative Impacts:*

*“Consultation with the appropriate agencies would determine what mitigation may be required to offset impacts to threatened or endangered species habitat; therefore this project would not contribute to a loss of habitat.”*

Western appreciates the Conservancy’s comment and will remove the text from the Draft SEIS and EIR. See section 3.3 of the Final SEIS and EIR for a revised section 4.2.2.5.

C.7-9 *The commenter questions the accuracy of the statement (below) in the Draft SEIS and EIR, stating that they believe that, to the extent the conclusion is based on the assumption that there will effectively be no loss of habitat, it is flawed. The statement is found on page 4-27, section 4.2.2.5, Cumulative Impacts:*

*“The expected planned growth within the Sacramento area would result in loss of habitat for special-status species. By participating with consulting agencies, HCP, and other conservation and mitigation efforts, these losses would be reduced to less than significant.”*

Given the correction identified under comment C.7-8, this assumption is eliminated. See section 3.3 of the Final SEIS and EIR for a revised section 4.2.2.5.

C.7-10 *The commenter states, “... given our experience that Western has failed to consult constructively with this organization, the NBHCP Plan Operator, we do not think that it is prudent or appropriate to assume that its future unspecified consultations with resource agencies will result in effective biological mitigation for the Project.”*

Western will consult with the USFWS on the route that is selected in the ROD. Western does not have the legal responsibility to consult with other state and local agencies or organizations. Western will, however, coordinate with appropriate agencies and organizations, as determined by the location of a selected alternative, when the timing is appropriate. It would be premature to coordinate in detail on multiple alternatives prior to the completion of detailed design, given that only one alternative would evolve into an active project.

## Response to Comment Set C.8

### Regional University Specific Plan (represented by Megan M. Quinn, Attorney with Remy, Thomas, Moose, and Manley, LLP)

C.8-1 *The commenter provides background on the proposed RUSP and describes that it is part of the Placer County General Plan (PCGP). The commenter notes, “The General Plan states that ‘future growth may occur in the unincorporated area or in areas annexed to an adjacent city.’ Thus, Placer County has planned for urban development on the RUSP project site since the 1994 General Plan.” The commenter states that Alternative C “undermines implementation of the SACOG Blueprint project in western Placer County, and undermines the last decade’s worth of land use planning for this portion of Placer County.” The commenter states, “As illustrated in Figure 4.9-3 of the Draft SEIS and EIR, Alignment 2C2 follows the northern boundary of the RUSP and will affect planned residential development, as well as planned roadways.” The commenter objects to inclusion of Alternative (Segment) 2C2 in the Draft SEIS and EIR and requests that this alternative be deleted from further consideration.*

Western developed all alternatives to minimize conflicts with existing and proposed land use plans, including the RUSP and proposed transportation projects. Figure 4.9-3 of the Draft SEIS and EIR shows the location of the RUSP and, while Segment 2C2 parallels the northern boundary of the RUSP, it is not immediately adjacent. Approximately 2.8 miles of the proposed Segment 2C2 parallels the RUSP along the northern boundary at a distance of 0.25 to 0.7 mile. A 0.7-mile portion of proposed Segment 2C2 would be located immediately adjacent to the eastern boundary of the RUSP area. See response to comment C.3-1 for a discussion of the compatibility of transmission line facilities with development and transportation improvements. Please note that Figure 4.9-3 in the Draft SEIS and EIR has been revised and is presented as Figure 3.3-1 in Chapter 3 of the Final SEIS and EIR.

C.8-2 *The commenter states that Alternative C would have an effect on air quality because it could “force additional growth westward, thereby creating more severe air quality impacts than would otherwise occur with the*

*long-planned growth in the County’s Future Study Area and in the RUSP area.” Further: “Development consistent with the Blueprint Plan will result in higher transit use than lower density development because Blueprint development provides higher residential densities in close proximity to transit hubs.”*

Western is unaware of the commenter’s stated result that residential development would need to move to the west because of transmission lines or that a transmission line would force a change of density within a plan or development proposal. Based on the information available on the proposed RUSP, the Blueprint Plan, and the Placer County General Plan, Western has determined that the proposed Project would not affect additional commuting miles or emissions from vehicles. Air quality impacts of the proposed Project are disclosed in section 4.1, Air Quality, of the Draft SEIS and EIR.

C.8-3 *The commenter states, “It appears from Figure 4.9-1 and Table 4.9-2 that no other alternative has near the potential land use impacts of [Alternative C], which will affect planned residential uses in the RUSP. Alignment 2C2 is located within or closely adjacent to the following plans/proposed developments: RUSP, Sierra Vista Specific Plan, Creekview Specific Plan, West Roseville Specific Plan, and the Curry Creek Community Plan.”*

This statement, that no segment other than 2C would affect the RUSP, is true and reflected accordingly in section 4.9, Land Use, of the Draft SEIS and EIR. Western is aware of the proposed plans and developments within the project area and has provided information on each of the listed plans in Table 4.9-2 of the Draft SEIS and EIR. Each alternative would have varying impacts on land uses. Please see section 1.5 of this Final SEIS and EIR for a comparative summary of land use impacts.

C.8-4 *The commenter calls attention to the Placer Vineyards Specific Plan in Table 4.9-2 and notes that the project was approved by the Placer County Board of Supervisors on July 16, 2007.*

Western appreciates this information and has updated the plan’s status. See the revised portion of Table 4.9-2 in section 3.1, Modifications, of the Final SEIS and EIR.

C.8-5 *The commenter states that “the Draft SEIS and EIR fails to recognize that the immediate adjacency of Alignment 2C2 to residential uses to the south of the alignment may result in significant noise impacts to those adjacent residential uses within the RUSP area.”*

Western has fully analyzed noise impacts, which are presented in section 4.10.2 of the Draft SEIS and EIR. There are no known existing residences near Segment 2C2 in the RUSP area that would be affected by temporary construction noise. Sound levels from typical construction equipment are shown in Table 4.10-2 of the

Draft SEIS and EIR. Noise from the proposed Project during maintenance and operations would consist of corona noise and would mainly occur during wet weather with noise levels low enough to blend into the background and not be noticeable beyond the edge of the ROW. Additionally, maintenance of the transmission line would result in the noise of routine inspection vehicles or aircraft periodically during the year. If repairs were required, noise would result from vehicles, equipment, and tools.

- C.8-6 *The commenter states that “Alignment 2C2 could necessitate complete re-alignment of planned roadways in the SVSP [Sierra View Specific Plan] and the RUSP, potentially affecting regional and sub-regional traffic and circulation in all of southwestern Placer County. This would constitute a significant but as-yet-unstudied adverse impact on the transportation network in southwestern Placer County. If this Alignment continues to be considered for possible approval, substantial additional analysis would be required before the Alignment legally could be approved, as recirculation of the environmental document would be necessary to disclose this additional analysis of the new adverse impact to the public.”*

Western has preliminarily consulted and will continue to consult with Caltrans, counties, and cities regarding planned and proposed infrastructure projects, particularly at the point when Western issues a ROD. As noted above, Western has considered the SVSP and RUSP projects in the Draft SEIS and EIR, but it would be premature to consider either of them to be an approved project. Nevertheless, transmission line design is flexible to accommodate shifts in siting when sufficient details of development plans become available for the selected alternative. Western has determined that the proposed Project would be compatible with planned and proposed transportation improvements. Western has adequately analyzed the effects on existing and known proposed development. No additional analysis or recirculation of environmental documents on Western’s part would be necessary.

- C.8-7 *The commenter states that “...Alignment 2C2 would cause potentially significant adverse impacts to wetlands, resulting in significant mitigation costs to member agencies in the proposed project. (Draft SEIS and EIR, p. 4-111.) These costs could be avoided if Alignment 2C2 is rejected.”*

Western discussed impacts to wetlands in Section 4.17 of the Draft SEIS and EIR and determined that none of the alternatives would result in any significant adverse impacts to wetlands. Western would bear the cost to mitigate wetland impacts according to agency requirements based on actual disturbance.

- C.8-8 *The commenter states that the RUSP applicants request that Segment 2C2 be eliminated from further consideration in the SEIS and EIR and that if it is*

*retained, substantial additional analysis would be required before the environmental documentation could be considered “legally adequate.”*

Comment noted. Western will retain all A, B, and C Alternatives for analysis through the SEIS and EIR process. Inclusion of these alternatives provides for a full, robust, comparative analysis, with which Western may make an informed decision. Based on information provided in the Draft SEIS and EIR, and responses to public comments, corrections, additions, and modifications in this Final SEIS and EIR, Western has determined that the analysis complies with NEPA and CEQA.

## Response to Comment Set C.9

### Richland Planned Communities, Inc.

- C.9-1 *The commenter states that Segment 2A4 is not environmentally superior to the other alternatives because “it is located directly north of a significant amount of existing residential homes. It would result in visual impacts to existing residents in the area.” The commenter recommends siting this segment further north, which would move it away from residences and allow for future development in that area.*

See response to comment C.4-5. Each alternative would result in visual impacts to existing residences. While visual impacts would be similar among action alternatives, Alternative C would result in a significant impact because it would violate the City of Roseville’s visual resource policy. This determination is based on the significance criteria listed in section 4.15.2.1 of the Draft SEIS and EIR. For this reason, the remaining action alternatives would be environmentally preferable to Alternative C. The No Action Alternative would be environmentally preferable to all action alternatives.

- C.9-2 *The commenter states that Segment 2A4 is not environmentally superior to other alternatives because construction noise impacts to existing residents along Segment 2A4 would occur and recommended siting the line further north to avoid noise impacts.*

Western has fully analyzed noise impacts, which are presented in section 4.10.2 of the Draft SEIS and EIR. Sound levels from typical construction equipment are shown in Table 4.10-2 of the Draft SEIS and EIR. Table 4.1-5, Proposed Construction Sequencing for Emission Calculations, shown in the air quality section of the Draft SEIS and EIR illustrates the likely scenario for construction activities. Work activities would be intermittent for any single given location. Construction would be short-term, with the duration expected to last approximately six months. A comparison shows that there would be minor differences in noise impacts among alternatives. No alternative is environmentally preferable relative to the others for noise impacts, except the No Action Alternative.

C.9-3 *The commenter states that Segment 2A4 is not environmentally superior to other alternatives because dust and vehicle emissions from construction activities would result in air quality impacts to existing residents along Segment 2A4 and recommended siting the line further north to avoid air quality impacts.*

Western understands that air quality is an important issue in the Central Valley. Air quality impacts of the proposed Project are presented in section 4.1, Air Quality, of the Draft SEIS and EIR. A comparison shows that there would be minor differences in air quality impacts among alternatives. Alternative B is the environmentally preferable action alternative for air quality impacts.

C.9-4 *The commenter states that Segment 2A4 is not environmentally superior to other alternatives, regarding traffic and transportation. The commenter states that “construction traffic and the movement of heavy equipment on Elkhorn Boulevard during construction of the proposed facility would potentially interfere with the planned widening of Elkhorn Blvd.” The commenter recommended siting the line further north to avoid impacts to traffic and transportation.*

Western will coordinate with all local and regional agencies as project design and scheduling are more thoroughly developed and prior to construction. A comparison shows that there would be minor differences in traffic and transportation impacts among alternatives. Each alternative would require heavy equipment and machinery access to the project site.

Additionally, each alternative would require stringing conductors across roads and highways, thereby causing traffic interruptions. Highway 99 carries the heaviest traffic in the project area and each alternative would need to cross it at least once. Each of the A alternatives, if located on the west side of Highway 99 would need to cross it three times. Western would carefully coordinate these crossings to ensure that traffic interruptions would be brief. The A alternatives on the west side of Highway 99 are least environmentally preferable, followed by the A alternatives on the east side of Highway 99, Alternative B, and Alternative C. The No Action Alternative is the most environmentally preferable with regard to traffic and transportation.

C.9-5 *The commenter states that Segment 2A4 is not environmentally superior to other alternatives, regarding land use because it includes “curving the 230-kV transmission line to the north of and around existing land uses (Natomas Mutual Water Company facilities) located on the north side of Elkhorn Blvd...”. The commenter states that this would “separate, or create a barrier between, this existing land use from future unplanned land uses”.*

To the extent possible, Western sited alternatives to use existing roads and project perimeters to minimize land

use impacts. For each of the alternatives, Western would have to design the alignment to avoid specific areas or obstructions. No alternative is environmentally preferable relative to the others for land use impacts, except the No Action Alternative.

C.9-6 *The commenter states that, “the four Segment 2A alignment alternatives to the north of Segment 2A4 are environmentally superior alternatives to the Segment 2A4 and the environmental documents should be revised to reflect this conclusion”.*

The commenter’s preference for Segments 2A1, 2A2, 2A3, and 2A5 is noted.

The analysis in the Draft SEIS and EIR, as well as public and agency comments, were used to identify Alternative B as the Environmentally Preferred Action Alternative in the Final SEIS and EIR. Refer to section 1.6, Preferred Alternatives, of the Final SEIS and EIR for more information on selection of the Environmentally Preferred Alternative and Preferred Alternative.

## Response to Comment Set C.10

### Sierra Vista Specific Plan (represented by Megan M. Quinn, Attorney with Remy, Thomas, Moose, and Manley, LLP)

C.10-1 *The commenter states that Segment 2C2 threatens not only the SVSP in the southern portion of the City’s MOU area but also the City of Roseville’s existing Reason Farms Environmental Preserve and existing wetland preserve in the West Roseville Specific Plan (WRSP).*

Western developed all alternatives to minimize conflicts with existing and proposed land use plans, including the SVSP and proposed conservation projects. Transmission systems are routinely constructed to be compatible with development and conservation improvements.

C.10-2 *The commenter states that Segment 2C2 could force additional growth westward, thereby creating more severe air quality impacts than would otherwise occur with the long-planned growth in the MOU area, including the SVSP area.*

See response to comment C.8-2.

C.10-3 *The commenter states that Segment 2C2 will have significant and unavoidable adverse impacts on biological resources within: (1) the Reason Farms Environmental Preserve, (2) the WRSP Open Space Preserve, and (3) the wetlands at the far northwest corner of the SVSP. Further, the commenter states that the significant and unavoidable adverse biological*



impacts of Segment 2C2 alone justify the rejection of this segment from further consideration.

See responses to comment sets A.2, A.3, and A.4 regarding biological resources, and response to comment C.8-8 regarding consideration of alternatives.

- C.10-4 *The commenter states that the boundaries of the SVSP are incorrectly identified in Figure 4.9-3 of the Draft SEIS and EIR. The commenter continues that Segment 2C2 would actually pass through the SVSP rather than adjacent to it as shown in Figure 4.9-3. The document must, therefore, be substantially revised before it is legally adequate.*

Western has made the correction to the SVSP in Figure 4.9-3, which is now presented as Figure 3.3-1 in the Final SEIS and EIR. A description of the correction and the corrected map can be found in Chapter 3, Modifications, Addenda, and Corrections, of the Final SEIS and EIR.

- C.10-5 *The commenter states that Segment 2C2 is located within or closely adjacent to the following plans and proposed developments: RUSP, SVSP, Creekview Specific Plan, West Roseville Specific Plan, and Curry Creek Community Plan, and would have greater land use impacts than the other alternatives.*

See response to comment C.8-3.

- C.10-6 *The commenter states that Segment C would traverse the western boundary of the City of Roseville sphere of influence. A goal of the City of Roseville General Plan is to preserve visual quality along the City's western boundary; transmission lines would substantially defeat this goal.*

The Draft SEIS and EIR (Section 4.15.2.3, page 4-99) recognizes the City of Roseville's visual resource policy and identifies a significant visual resource impact associated with Segment 2C2.

- C.10-7 *The commenter states that the status of the Placer Vineyards Specific Plan in Table 4.9-2 should be updated to reflect the project's approval by the Placer County Board of Supervisors on July 16, 2007.*

Western appreciates the commenter's correction and has updated Table 4.9-2 to reflect Placer County's approval of the Specific Plan. The revised table is presented in Chapter 3, Modifications, Addenda, and Corrections, of the Final SEIS and EIR.

- C.10-8 *The commenter states that the Draft SEIS and EIR fails to recognize that Segment 2C2 would be located adjacent to residential uses and result in significant noise impacts to those adjacent residential uses.*

See response to comment C.8-5.

- C.10-9 *The commenter states that Segment 2C2 would potentially affect regional and sub-regional traffic and circulation in all of southwestern Placer County, which would constitute a significant but as-yet-unstudied adverse impact on the transportation network.*

See response to comment C.8-6.

- C.10-10 *The commenter states that the City of Roseville General Plan Growth Management Element contains a visual quality policy goal for new development west of Fiddymont Road. The policy states that growth should be managed in such a way to ensure that significant open-space areas will be preserved. The commenter continues that transmission lines located immediately adjacent and parallel to the City of Roseville's western boundary conflict with this visual quality policy.*

Western is aware of the visual impact transmission lines may cause and the Draft SEIS and EIR identifies the referenced policy conflict (section 4.15.2.3, page 4-99) and includes EPM 97 (see Appendix C of the Final SEIS and EIR) to minimize these impacts.

- C.10-11 *The commenter states that Segment 2C2 would cause potentially significant adverse impacts to wetlands, resulting in significant mitigation costs that could be avoided if Segment 2C2 were rejected.*

See response to comment C.8-7.

- C.10-12 *The commenter requests that Segment 2C2 be eliminated from further consideration. The commenter notes that substantial additional analysis would be required before the SEIS and EIR would be considered legally adequate if Western retained Segment 2C2.*

Comment noted. See response to comment C.8-8.

## Response to Comment Set C.11

### The Yekun Lim & Inok Lim Revocable Trust

- C.11-1 *The commenter states that Alternatives A3, A4, and A5 "severely impact" their property of 306 acres bordering Elverta Road and SR 70/99. The commenter states that these alternatives would visually intrude as well as limit developable acreage. The commenter states that Alternative A5 "goes east through the middle of the property and completely bisects it, thereby limiting access and creating visual intrusions throughout all the property." Along with these concerns, the commenter states his strong objection to interfering "with future infrastructure and locating schools." The commenter requests that Western select an alternative with fewer impacts on development or farming, such as Alternative B.*

To the extent possible, Western has sited the alternatives to minimize conflicts with planned and proposed development and infrastructure projects in the study

area. To the extent possible, Western sited alternatives to use existing roads and project perimeters to minimize land use and visual impacts. Western makes every reasonable effort to site alternatives away from residences and schools. Transmission lines would be sited so as not to limit access to any properties and to avoid all existing schools. Western understands that future developments will need to comply with siting requirements to place schools at least 150 feet from an existing 230-kV transmission line. Western acknowledges that each of the alternatives would result in visual effects. Western has determined, however, that visual impacts would be less than significant, as described in Section 4.15, Visual Resources, of the Draft SEIS and EIR.

The commenter's request that Western select an alternative with fewer impacts on development or farming, such as Alternative B, is noted.

## 2.2.3 Individual and Landowner Comments (Category I)

### Response to Comment Set I.1

#### Individual Commenter I.1

I.1-1 *The commenter, Kevin Kemper of the Law offices of George E. Phillips, writes on behalf of his clients. The commenter states that his clients own property in unincorporated Placer County near the proposed Project. The commenter states that CEQA Guidelines "require a Draft EIR to explicitly identify the environmentally superior alternative". The commenter continues, "If the 'no-project alternative' is the environmentally superior alternative, as is the case here, an EIR must also identify an environmentally superior alternative from among the remaining alternatives". The commenter further states, "Table 3-4 of the SEIS/SEIR presents a summary comparison of the various Segment 2 alternatives, but the SEIS/SEIR does not contain a conclusion as to which alternative among those analyzed is the environmentally superior alternative. In this respect, the SEIS/SEIR fails to comply with CEQA requirements".*

In accordance with NEPA and CEQA, SEIS and EIR consists of the combined analysis and information provided in the Draft SEIS and EIR and the Final SEIS and EIR. In Chapter 3 and Appendix A of the Draft SEIS and EIR, a description of the proposed Project alternatives is provided along with general discussion of how the alternatives were developed. In Section ES.8 and ES.9 and within each resource section of the Draft SEIS and EIR, a summary comparison is provided between the direct, indirect, and cumulative impacts of the action alternatives and the No Action alternative.

Western has provided a discussion of its Preferred Alternative and Environmentally Preferred Alternative

in Section 1.6 of the Final SEIS and EIR. Western determined that the No Action Alternative is environmentally preferred. Alternative B is the Environmentally Preferred Action Alternative. This determination is supported by the documentation and conclusions contained within each resource area in the Draft SEIS and EIR.

I.1-2 *The commenter states, "...Alternative 2C is not the environmentally superior or preferable alternative", due to impacts on agricultural land, including Williamson Act land. Additionally, the commenter stated that, "heightened regard for impacts to agricultural uses should be given where contracts parcels are affected".*

Identification of the Environmentally Preferred Alternative for the proposed Project involved difficult judgments, particularly when one environmental value must be balanced against another. Western considered Williamson Act lands as well as habitat conservation plans, protected species, existing and planned development, among other considerations in identifying the Preferred Alternative.

I.1-3 *The commenter states that monopoles and transmission lines "will prevent all manner of aerial spraying (crop dusting) on adjacent agricultural land", and states that surface application would not be cost-effective, which would exacerbate the current challenges of California agriculture and potentially exclude the property owners from competing in the agricultural market with growers who "are not burdened in this way".*

See response to comment C.7-7.

I.1-4 *The commenter states that "priority in the decision making process must be given to protecting the viability of agricultural operations on lands where no other use is permitted" (i.e., Williamson Act land).*

See response to comment I.1-2.

I.1-5 *The commenter suggests that, if all seven route alternatives satisfy the proposed Project's purpose and need, selection of a preferred alternative should be driven by environmental concerns.*

Western agrees with the commenter. Environmental impacts were a leading reason, along with economic and engineering factors, for selecting Alternative B as the overall Preferred Alternative.

I.1-6 *The commenter states that the property owners would require that Western "acquire the ROW area in fee title, and pay compensation for severance damages to the remainder of the Allen parcel associated with the reduction in value and use potential caused by the project".*

Western will coordinate with affected landowners prior to construction. Western would acquire rights by providing just compensation to the landowner based on the fair market value of the land. Landowners would retain title to the land and continue to use the property in ways that would be compatible with the transmission line.

## Response to Comment Set I.2

### Individual Commenter I.2

I.2-1 *The commenter, the Law Offices of Mark J. Reichel, writes on behalf of his client. The commenter states that his client owns more than 140 acres along Pleasant Grove Road. The commenter requested that Western contact him.*

Western and the commenter communicated verbally. It was determined that the project would not traverse the subject property owner's land. No further comments were provided.

## Response to Comment Set I.3

### Individual Commenter I.3

I.3-1 *The commenter, a resident of South Sutter County, states opposition to "continued encroachment on our resources, particularly from outside sources having no interest in the welfare of South Sutter County". The commenter expresses a preference for Alternative B, stating that it would be less negative impact because the route would use less agriculture acreage, have less visual impact, and have less habitat resource impacts.*

Comment noted.

I.3-2 *The commenter states that the 2A segments (along Highway 99) would*

- ... "use more valuable agricultural land."
- ... "be a hazard to low flying agricultural aircraft operations."
- ... "be a possible hazard to the use of portable irrigation equipment such as sprinkler or gated pipe systems (typically 40 foot lengths)."
- ... "be a possible hazard to ground operation of wide tillage, planting and harvesting equipment."

Western is aware of these potential impacts on agricultural land uses and farming operations from the construction and operation of the proposed Project. During preparation of the Draft SEIS and EIR, staff thoroughly analyzed these impacts and developed EPMS to reduce the impacts to less than significant levels. Utilities currently have numerous transmission lines

operating within agricultural lands throughout California. Although farming operations may require adaption to the presence of monopoles, farming operations are compatible with the presence of transmission lines.

I.3-3 *The commenter states that the 2A segments would be "a visual eyesore to motorists on Highway 99".*

See response to comment C.4-5.

I.3-4 *The commenter states that the 2A segments would be "a hazard to life flight aircraft responding to accident scenes on Highway 99".*

As stated previously, Western acknowledges the hazards presented when aircraft come into close proximity to transmission lines. Western used the Sacramento County Zoning Code (Section 301-11) as guidance to identify alternative routes throughout the study area. The zoning code states a preference for siting transmission lines adjacent to freeway routes. It is possible that a life flight aircraft could strike a transmission line structure during an accident scenario for any action alternative. Life flight crews are highly trained and experienced in navigating near power lines. Many streets and highways have power lines adjacent to power lines where life flight aircraft effectively operate. To minimize risk, Western will coordinate with local and regional agencies and officials once a decision is issued, to ensure the proposed Project meets all applicable requirements and complies with safety standards.

I.3-5 *The commenter states that the 2A segments would "interfere with improvements to Highway 99 which will be required in the future".*

See response to comment set A.5.

I.3-6 *The commenter states that the 2A segments would "be a hazard for migrating waterfowl that typically congregate in the area between the Verona Cross Canal and Elverta Road along Highway 99 in the winter season".*

See responses to comments A.4-2 and A.4-3.

I.3-7 *The commenter suggests solar and wind generation facilities for increasing local generating capacity.*

SMUD has recently increased the capacity of the Solano Wind Farm, located in Solano County, to 105 MW and is currently in the environmental analysis stage for increasing the capacity to approximately 230 MW. SMUD is also currently soliciting proposals for qualified renewable energy resources to add to SMUD's existing portfolio. The resources could include biomass, geothermal, landfill, and small hydro (<30MW). The request is for resources located in and outside of the SMUD service area. Some of the potential resources are not available in the SMUD service area and therefore

- transmission of the energy to SMUD is necessary. The energy generated by these resources requires additional transmission capacity and is a common issue for all Load Serving Entities throughout California. Although it is expected that Load Serving Entities would rely more on renewable energy resources, conservation, and energy efficiency and the potential for the construction of new local generation facilities, transmission system planning studies continue to show that transmission system upgrades are necessary to maintain transmission reliability.
- I.3-8 *The commenter suggests that SMUD “develop more co-generation facilities, such as Blue Diamond facilities” to increase local generating capacity.*
- SMUD and Blue Diamond have completed a feasibility study for the potential installation of a 2-MW co-generation facility at Blue Diamond’s facilities in Sacramento. Discussions on the project’s specifics are underway.
- I.3-9 *The commenter suggests that SMUD “increase capacity of Athens co-generation plant” to increase local generating capacity.*
- The “Athens co-generation” facility is located in the California Independent System Operator (CAISO) balancing authority and is owned and operated by a private company. SMUD has generally limited co-generation power plant participation to facilities that are to be located within the SMUD service area.
- I.3-10 *The commenter suggests that SMUD “require solar heat and electric installation in all new construction” to increase generating capacity and encourage conservation.*
- SMUD does not have the authority to change building codes. However, SMUD works closely with the local home building industry to design and construct energy efficient homes such as the energy efficient SMUD Advantage Homes and SMUD Solar Smart Homes. SMUD also provides financial incentives and technical assistance through the Savings by Design program to encourage energy efficient design of nonresidential facilities. The City of Roseville offers similar solar incentive programs to promote solar technology in new construction.
- I.3-11 *The commenter suggests that SMUD “require hook up impact fees to provide funding (for) new generation facilities”.*
- Although SMUD and Roseville do not collect “hook-up” fees that exceed the general cost of the service to fund new generation, SMUD and Roseville collect “Public Good” funds in their rates. These funds go towards funding energy efficiency programs and renewable energy projects.
- I.3-12 *The commenter suggests that SMUD “encourage use of more efficient night and security lighting”.*
- SMUD and Roseville have existing programs that make available low energy fluorescent lighting to its customers at local retail stores. SMUD has an existing security lighting program that partners with residential and business customers and law enforcement to install energy efficient night and security lighting. SMUD also provides incentives to business customers to replace existing lighting with energy efficient lighting.
- I.3-13 *The commenter suggests that SMUD “re-conductor existing lines; increase voltage; improve or reconstruct old existing lines”.*
- Upgrading the existing structures would not be feasible because the existing transmission structures would need to be rebuilt to accommodate at least three and sometimes four circuits (nine to twelve conductors) on each structure that would have significantly larger footprints than that of the monopole system. Clearance requirements to ensure safe distances between conductors would require the structures to be significantly taller than those of the proposed Project. Because the structures would need to be rebuilt, long-term outages of the transmission system would be required, significantly reducing the reliability of the entire transmission system during the outages.
- I.3-14 *The commenter suggests that SMUD “improve existing SMUD hydroelectric facilities” to increase local generating capacity.*
- SMUD regularly reviews new technology for the potential to increase the output of SMUD’s Upper American River Project (UARP) hydroelectric facilities. Since the UARP’s original construction in the late 50’s and early 60’s, new technologies and updating equipment has increased the output of the UARP.
- I.3-15 *The commenter suggests that SMUD “build natural gas fired peak back-up plants” to increase local generating capacity.*
- Roseville recently completed the construction of the 160 MW natural gas fired Roseville Energy Park in 2007. SMUD recently completed construction of the 500 MW natural gas-fired Cosumnes Power Plant (CPP) in 2006. CPP has the potential for expanding to a total of 1000 MW if approved by the SMUD Board of Directors and licensed by the California Energy Commission (CEC). Additional natural gas fired power plants are currently being proposed by energy producers to the CEC for construction in the northern California area. These power plants would require a transmission system that can reliably transport the power from the power plant to communities.
- I.3-16 *The commenter suggests that SMUD “re-activate Rancho Seco” to increase local generating capacity.*

In June of 1989, SMUD ratepayers voted through the referendum process to close Rancho Seco. Since that time, the Nuclear Regulatory Commission approved SMUD's plan for decommissioning the power plant. Currently the power plant equipment and components have been removed and the power plant structure is now currently being dismantled and removed.

- I.3-17 *The commenter suggests that SMUD "build Auburn Dam" to increase local generating capacity.*

The U.S. Bureau of Reclamation is not currently pursuing the Auburn Dam project. The Auburn Dam project would be an extremely controversial and costly project. Even if funding were approved by Congress next year, the project would take many years before energy would be available from the project. The proposed Project's purpose and need for maintaining transmission system voltage stability, reliability, and security of the greater Sacramento is more immediate.

- I.3-18 *The commenter states that the proposed Project "is to benefit the Sacramento and Roseville areas, therefore those areas should accept the environmental and economic impacts this project would cause rather than transferring the consequences to neighboring Sutter County".*

The greater Sacramento-area transmission system consists of the interconnected transmission facilities of several transmission system owners. These owners include Western, SMUD, Roseville, and Pacific Gas and Electric. Because the proposed Project would help maintain voltage stability, reliability, and security and provide additional power-importing capabilities for the greater Sacramento-area transmission system, the counties and cities in northern California including Sacramento, Placer, and Sutter Counties will directly benefit from the proposed Project.

The power system in the greater Sacramento area comprises a complex network of power supply (generation), transfer (transmission and distribution), and demand (use). One could compare it with a road system for a metropolitan area where people need to get from point A (supply) to point B (demand) by traveling along a highway (transfer). Western cannot state that all supply or demand comes from or travels to a single location. Rather, there are many locations where supply originates and demand terminates. Similarly, the power system relies on many sources of power within and outside of the greater Sacramento area to serve customers in many different locations.

Road systems have certain key hubs (interchanges and intersections) that handle large volumes of traffic. Smaller and smaller intersections provide more intricate networks to serve smaller and smaller volumes of traffic to specific destinations. In the case of the power system, there are certain key substations to manage a large amount of electricity as well as smaller and

smaller substations to serve more specific locations. The O'Banion, Elverta, and Natomas substations are key hubs for the power system in the greater Sacramento area even though these areas do not necessarily represent the final destination or demand for power.

## Response to Comment Set I.4

### Individual Commenter I.4

- I.4-1 *The commenter expresses very strong opposition to Western locating power lines through his property. The commenter states, "Alternatives [Segments] 2A1, 2A2, and 2A5 all will bring power lines within approximately 50 feet from our home."*

Comment noted. Western reviewed Alternatives A1, A2, and A5 and notes that the distance from centerline of the alternatives to the commenter's existing home is approximately 320 feet. Western makes every reasonable effort to locate alternatives away from existing residences and schools. Western recognizes, however, that in some cases, alternatives may pass near residences.

## Response to Comment Set I.5

### Individual Commenter I.5

- I.5-1 *The commenter states that the A alternatives, whether east or west of Highway 99, would require an easement from (their) ranch. The commenter expresses concern that the 2A segments would have a negative visual impact to all travelers along Highway 99.*

See response to comment C.4-5.

- I.5-2 *The commenter states that the 2A segments would have negative impacts to future improvements along Highway 99.*

See responses to comment set A.5.

- I.5-3 *The commenter states that the 2A segments would cause "an increased hazard for anyone leaving the highway during an accident and possibly coming to rest against a tower structure".*

The proposed 2A segments parallel to Highway 99 would be located away from the road shoulder. In general, there are existing agricultural ditches on the east and west sides of Highway 99 between the highway and the proposed alignment that would make collision with the monopoles less likely. It is possible that a vehicle could strike a transmission line structure during an accident scenario for any action alternative. To minimize risk, Western will coordinate with local and regional agencies and officials once a decision is issued, to ensure the proposed Project meets all applicable

- requirements and complies with applicable safety standards.
- I.5-4 *The commenter states that the 2A segments would “cause a hazard for life flight aircraft responding to an accident scene”.*  
See response to comment I.3-4.
- I.5-5 *The commenter states that the 2A segments would “cause interference for the signal from the cell tower at the intersection of Highway 99 and Howsley Road”.*  
Utilities commonly co-locate cellular equipment with transmission line structures. This practice has been done on several Western facilities. As such, it is not expected that interference would occur from siting the transmission line in close proximity to the cellular facility. As necessary, Western would coordinate with the owner/operator of the cellular facility to ensure minimal interference.
- I.5-6 *The commenter states that the 2A segments would “cause a hazard for the airplanes participating in agricultural practices in the area”.*  
See response to comment C.7-7.
- I.5-7 *The commenter states that the 2A segments would cause “a hazard for well and pump installations and maintenance both for the C. Morrison and the Natomas Mutual Water Company’s pumping plants”.*  
Overhead transmission line design is flexible to accommodate shifts in siting locations. Western would coordinate with affected pumping plant owners to ensure that pumping operations would not be precluded by the proposed transmission line.
- I.5-8 *The commenter states that the 2A segments would “cause a negative impact on the ground operations of our ranch and other agricultural operations along the route”.*  
See response to comment I.3-2.
- I.5-9 *The commenter states that the 2A segments would “require the further loss of acreage for farmers who were required to sell acreage to the State of California when Highway 99/70 was widened to four lanes”.*  
Unlike construction of a freeway, overhead transmission lines would not require loss of substantial acreage and would not preclude continued farming operations under the line. See also responses to comments I.1-6 and I.3-2.
- I.5-10 *The commenter states that Segment 2B would have the least impacts on agriculture because it would require less acreage for easements and would require the least amount of construction.*
- Comment noted.
- I.5-11 *The commenter states that the residents “of Sutter County will be required to suffer the impact of the added transmission system when Sacramento and Roseville are the recipients of the additional electricity. Sacramento and Roseville should provide additional electricity for their growth from within their boundaries...”.*  
See responses to comments I.3-18.

## Response to Comment Set I.6

### Individual Commenter I.6

- I.6-1 *The commenter states that Alternatives A3 and A5 will place power lines through their land. The commenter has concerns about the transmission line interfering with farming operations.*  
See response to comment C.5-1.
- I.6-2 *The commenter has concerns about the transmission line interfering with proposed future development and reducing developable acreage.*  
To the extent possible, Western sited alternatives to use existing roads and project perimeters to minimize land use and visual impacts. The proposed Project is compatible with proposed development in the study area. The proposed ROW can be used for open space, landscaping, trails, parks, ball fields, drainage basins, and other compatible uses required of most developments, as well as being compatible with highways and other linear infrastructure projects and installations.  
For any alternative selected, Western would acquire easements by providing compensation to the landowner based on the fair market value of the land. The highest and best use of the land is considered in the appraisal of the land and easement.
- I.6-3 *The commenter has concerns about the negative visual impacts.*  
See responses to comments C.4-5 and C.4-9.
- I.6-4 *The commenter believes the transmission line is not compatible with the proposed interchange at SR 99 and Elverta Road.*  
See responses to comment set A.5 and comment C.3-1.
- I.6-5 *The commenter requests that Alternative A5 be eliminated.*  
Comment noted. Western will retain all A, B, and C Alternatives through the SEIS and EIR process. Inclusion of these alternatives provides for a full, robust, comparative analysis with which Western may make an

informed decision. Based on the Draft SEIS and EIR, responses to public comments, corrections, additions, and modifications in the Final SEIS and EIR, Western has determined that the analysis complies with NEPA and CEQA.

## Response to Comment Set I.7

### Individual Commenter I.7

I.7-1 *The commenter referenced the July 2007 newsletter. The commenter states that there is no railroad ROW south of Baseline Road and the railroad ROW was sold to private parties.*

To clarify, Western's use of the word "abandoned" railroad ROW refers to the fact that there are no longer active rail operations. Western understands that there are multiple property owners who have purchased parcels along the abandoned railroad ROW.

I.7-2 *The commenter states that Segment E3 would divide the town of Riego. The commenter states that if E3 is chosen, "it will divide the town in half" The commenter further states that transmission lines "haven't been proven to be safe" and they would be "catastrophic to (the town's) future growth".*

As described in section A.3.3 in Appendix A of the Draft SEIS and EIR, Segment E3 was eliminated from further consideration due to engineering constraints. This is explained further in section 3.1.5 of the Final SEIS and EIR.

Overhead transmission lines do not divide communities. A variety of land uses associated with community growth and development are compatible with transmission line ROWs.

See response to comment A.8-3 regarding the public health risks of transmission lines.

## Response to Comment Set I.8

### Individual Commenter I.8

I.8-1 *The commenter states that Alternatives A1, A2, A3, A4, and A5 would go through their property. The commenter expresses strong opposition to locating lines through their property and next to their home. The commenter states intentions to develop much of their 58 acres for residential use but to keep the existing home and some acreage for horses. The commenter states that the lines "directly impact our home" and that they "cannot live with this intrusion."*

Western reviewed the Alternatives A1, A2, A3, A4, and A5 and calculated the distance from the transmission centerline to the commenter's home to be approximately 200 feet. Western has many transmission lines that

cross residential properties. Although Western makes every reasonable effort to locate alternatives away from existing residences, in some cases alternatives must pass near residences.

I.8-2 *The commenter believes transmission lines will interfere with development plans and reduce the value of their land.*

Regarding development potential, see response to comment I.6-2. Western acknowledges that the presence of transmission or distribution lines is one factor among many that may affect property values and planning. For any alternative selected, Western would acquire easements by providing just compensation to the landowner based on the fair market value of the land. The highest and best use of the land is considered in the appraisal of the land and easement.

## Response to Comment Set I.9

### Individual Commenter I.9

I.9-1 *The commenter states that she owns a portion of the abandoned railroad ROW through which she thinks Segment 2B would run.*

See response to comment I.7-1.

I.9-2 *The commenter states that visual impacts would compromise the quality of life for the residents on her property.*

See responses to comments C.4-5 and C.4-9.

I.9-3 *The commenter expressed concern that there may be potential health impacts and asks whether there is "documentation of cancer...from transmission lines so close to homes".*

See response to comment A.8-3.

I.9-4 *The commenter states that the presence of transmission lines would decrease her property value.*

See response to comment I.8-2.

I.9-5 *The commenter states that she would "entertain a fair offer" if Western wished to purchase her parcels.*

See response to comment I.1-6.

I.9-6 *The commenter states that she did not receive the invitation to the public forum. Additionally, the commenter expresses concern that there was not sufficient time to submit comments on the Draft SEIS and EIR.*

Per CEQA and NEPA, Western held a 45-day comment period, beginning July 13 and ending August 27, 2007. According to Western's database, all newsletters and

documents were mailed to the property owner on record, as required. The July 2007 newsletter, distributed by July 10, notified the public of the August 7 and 8 public comment forums and specified that comments would be accepted until August 27, 2007.

- I.9-7 *The commenter questions the reason for the hotline because the meeting dates had already passed when she called it. The commenter asks why a phone number was not provided.*

The hotline is intended to provide project information updates and an opportunity for the public to leave messages for Western representatives. Western provided multiple means of contact, including fax, e-mail, website, and the hotline.

- I.9-8 *The commenter requests to know whether Segment 2B traverses her property and expresses her opposition to it. Further, the commenter states that her property should be purchased at fair market value.*

With regard to the commenters' parcels, proposed Segment 2B would cross APN 023-170-007.

With regard to purchasing land rights, see response to comment I.1-6.

## Response to Comment Set I.10

### Individual Commenter I.10

- I.10-1 *The commenter opposes locating the proposed Project on their property.*

Comment noted.

- I.10-2 *The commenter would like to see the existing system revamped instead of building a new transmission line.*

See response to comment I.3-13.

- I.10-3 *The commenter has concerns about health risks associated with these transmission lines, stating "a few years ago, the government did a study and found that there was adverse health risks associated with these transmission systems."*

See responses to comments A.8-3 and C.4-17.

## Response to Comment Set I.11

### Individual Commenter I.11

- I.11-1 *The commenter owns 26 acres south of Elverta Road and expresses "very strong opposition" to Alternatives A1, A2, A3, and A5 "all of which will go through our property and will directly impact our home."*

Comment noted.

- I.11-2 *The commenter is concerned about "the very significant visual impacts on us and our home."*

See responses to comments C.4-5 and C.4-9 with regard to visual impacts.

- I.11-3 *The commenter is concerned about the loss of development potential and how this will affect the value of their property.*

See response to comment I.8-2.

- I.11-4 *The commenter requests that Western select an alternative that does not directly impact their home or the value of their property. The commenter suggests that there are "far fewer impacts" with Alternatives B and C and that one of these "should be selected instead of a route which has such damaging impacts on us and our neighbors."*

Comment noted.

## Response to Comment Set I.12

### Individual Commenter I.12

- I.12-1 *The commenter states that Segments 2A1, 2A2, 2A3, and 2A5 would reduce the value of his home and diminish the development potential of his property and that of his neighbors.*

See response to comment I.8-2.

- I.12-2 *The commenter states that the transmission lines would "go over my irrigation artery and would destroy the irrigation system as well as the use of my irrigation pump".*

Western is aware of potential impacts on farming operations (including irrigation) from the construction and operation of the proposed Project.

Overhead transmission line design is flexible to accommodate shifts in siting locations. Western would coordinate with affected land owners to ensure that irrigation operations would not be precluded and irrigation equipment would not be damaged by the proposed transmission line.

Utilities currently have numerous transmission lines operating within agricultural lands throughout California. Although farming operations may require adaption to the presence of monopoles, farming operations (including irrigation) are compatible with the presence of transmission lines.



## Response to Comment Set I.13

### Individual Commenter I.13

I.13-1 *The commenter states that Alternatives A3 and A5 go through his land. The commenter expresses “strong opposition” to “any alternative which locates overhead power lines along Elverta Road or through the north part of my land (Alternative [Segment] 2A5).”*

Comment noted.

I.13-2 *The commenter states that overhead power lines “inhibit access” to his land.*

See response to comment C.4-8.

I.13-3 *The commenter states that overhead power lines “reduce the value of the balance of the land.”*

For any alternative selected, Western would acquire easements by providing compensation to the landowner based on the fair market value of the land. The highest and best use of the land is considered in the appraisal of the land and easement.

I.13-4 *The commenter states that overhead power lines “have adverse visual impacts.”*

See responses to comments C.4-5 and C.4-9.

I.13-5 *The commenter states that overhead power lines “interfere with new infrastructure for development.”*

See response to comment C.4-3.

I.13-6 *The commenter requests that Alternatives A3 and A5 be eliminated from further consideration.*

Western will retain all A, B, and C Alternatives through the SEIS and EIR process. Inclusion of these alternatives provides for a full, robust, comparative analysis with which Western may make an informed decision.

I.13-7 *The commenter requests that Alternatives B or C be selected, stating that they have the same environmental impact but they do not affect property proposed for development.*

Comment noted. Each alternative has varying impacts to environmental resources and planned development. A comparison is provided in Table B-1 of the Final SEIS and EIR.

## Response to Comment Set I.14

### Individual Commenter I.14

I.14-1 *The commenter states that he owns approximately 59 acres south of Elverta Road at East Levee Road and “strongly” opposes power lines along the west and south boundaries of his property.*

Comment noted.

I.14-2 *The commenter is concerned about the amount of acreage that Western would want to acquire.*

Western describes the ROW needs of the proposed Project on page 3-18, section 3.4.2, Right-of-Way Requirements, in the Draft SEIS and EIR.

For any alternative selected, Western would acquire easements by providing compensation to the landowner based on the fair market value of the land. The highest and best use of the land is considered in the appraisal of the land and easement.

I.14-3 *The commenter is concerned about “the harm to the development potential of my property if it has power lines on two sides, whether on my property or not.”*

See response to comment I.6-2.

I.14-4 *The commenter states that “locating major new power lines in an area slated for new development makes for very poor planning.”*

Comment noted.

I.14-5 *The commenter is “very concerned” about access, given that East Main Drainage lies to the east of his property and Western proposes power lines on the west and south sides of his property.*

See response to comment C.4-8.

I.14-6 *The commenter states, “Any attempts to acquire my property will be resisted and will result in litigation.”*

Comment noted.

## Response to Comment Set I.15

### Individual Commenter I.15

I.15-1 *The commenter represents landowners with 306 acres on the north side of Elverta Road next to SR 70/99. The commenter states that the landowners are “strongly opposed to... power lines along Elverta Road and SR 70/99 and through the middle of their property.”*

Comment noted.

- I.15-2 *The commenter is concerned about “visual intrusions.”*  
See responses to comments C.4-5 and C.4-9.
- I.15-3 *The commenter is concerned about loss of easy access.*  
See response to comment C.4-8.
- I.15-4 *The commenter states, “If both the interchange and the power lines are placed on the [landowners’] property, the development potential of their property will be greatly reduced.”*  
  
See response to comment C.3-1 and responses in comment set C.6.
- I.15-5 *The commenter states, “No power lines should go through the middle of any property when other routes are available.”*  
  
To the extent possible, Western has sited the alternatives to minimize conflicts with planned and proposed development and infrastructure projects in the study area. To the extent possible, Western sited alternatives to use existing roads and project perimeters to minimize land use and visual impacts to property.
- I.15-6 *The commenter states, “For these reasons, right-of-way acquisition will be very expensive because of severance damages.”*  
  
Comment noted.
- I.15-7 *The commenter requests that Western select another route, such as Alternative B.*  
  
Comment noted.
- I.16-2 *The commenter is concerned about the long-term health impacts the proposed Project would have on his family.*  
  
See responses to comments A.8-3 and C.4-17.
- I.16-3 *The commenter states, “This will have a negative impact [on] our property’s value and its future ability for sale.”*  
  
See response to comment I.8-2.

## Response to Comment Set I.17

### Individual Commenter I.17

- I.17-1 *The commenter states that they own 499 acres on the north side of Elkhorn Boulevard, which “will be directly affected” by Western’s Alternative A4. The commenter states that the proposed Project would place two 230-kV power lines on the north side of Elkhorn Boulevard.*  
  
Western clarifies that the proposed Project would be to build one new, double-circuit transmission line.
- I.17-2 *The commenter expresses concerns about “limitations on access”.*  
  
See response to comment C.4-8.
- I.17-3 *The commenter expresses concerns about health effects from possible emissions.*  
  
See responses to comments A.8-3 and C.4-17.
- I.17-4 *The commenter expresses concerns about the “need to locate schools away from the power lines.”*  
  
See response to comment C.4-4.
- I.17-5 *The commenter expresses concerns about “interference with other infrastructure needed to serve future development.”*  
  
See response to comment C.4-3.
- I.17-6 *The commenter states, “These are very significant impacts and should be avoided where, as here, other alternatives are available.”*  
  
Western has determined that, with the exception of Alternative C (because it violates the Roseville General Plan Growth Management Growth Areas Policy 9), no direct, indirect, or cumulative impacts would result from any of the alternatives.
- I.16-1 *The commenter states, “It appears to us that you are using the old railway right of way as a means of avoiding the cost and trouble associated with the purchase of the best easement. The old railway seems to be convenient for your purposes.”*  
  
Western has considered a spectrum of environmental and land use impacts when selecting the alternative routes. To the extent possible, Western would site transmission lines in existing ROWs and along the perimeter of farmland areas. In many cases, this approach minimizes environmental and land use impacts because use of existing access roads can be optimized and these areas tend to act as natural transition areas. As described in Appendix A of the Draft SEIS and EIR, Western used SMUD’s criteria established in the Sacramento County Zoning Code, Section 301-11, for siting electrical transmission lines of 100-kV or greater. Western identified Alternative B as the Preferred

I.17-7 *The commenter requests that Western select Alternative C “and reduce the impacts on a major future development area for the City of Sacramento.”*

Comment noted.

## Response to Comment Set I.18

### Individual Commenter I.18

I.18-1 *The commenter states that Segment 2B “would go right over [their] new home”. The commenter requests an estimate of the timeline for building the proposed Project.*

Western has met with the property owners and the proposed transmission line would not pass above their house, but would require an easement through their parcel. Western expects to start construction of the proposed Project by 2009.

## Response to Comment Set I.19

### Individual Commenter I.19

I.19-1 *The commenters are landowners in the Project area. They request information regarding the location of the proposed Project and whether any proposed segments would traverse their property.*

Western contacted the commenters and described the location of the proposed Project in relation to the commenters’ property. No further comments were provided.

## Response to Comment Set I.20

### Individual Commenter I.20

I.20-1 *The commenters own 105 acres north of Elverta Road. They express “very strong opposition” to Western locating power lines “along the north side of Elverta Road or along the west side of the Natomas East Main Drain, on our property.”*

Comment noted.

I.20-2 *The commenters state that they are planning to develop their property and believe the transmission line would make it more difficult to plan and would reduce property values.*

See response to comment I.8-2.

I.20-3 *The commenters are concerned about how “unsightly” the line will be.*

See responses to comments C.4-5 and C.4-9.

I.20-4 *The commenters are concerned that transmission lines are “incompatible with new development.”*

See response to comment I.6-2.

I.20-5 *The commenters are concerned that the transmission line will interfere with the new freeway interchange at Elverta and Highway 99.*

See response to comments A.5-1 and C.4-3.

I.20-6 *The commenters request that Western eliminate Alternatives A1, A2, and A5 and any other alternative affecting their land. They request that Western consider Alternatives B and C.*

Comment noted. Also, see response to comment C.8-8.

## Response to Comment Set I.21

### Individual Commenter I.21

I.21-1 *The commenter states that the transmission lines hamper ground preparation activities such as plowing, disking, and planting. The commenter states that restricting tractor passes and driving around towers causes the land around towers to be less level. The commenter states that towers present a dangerous situation with large tractors and large tillage equipment because a collision “could cause a tower to fall and result in very destructive and possible lethal consequences.” Tractor work in fields with towers requires more highly skilled operators. The commenter states that there are problems associated with row crops and irrigation, with more intensive labor needed in these areas, as well as loss of planted rows during cultivation and the inability to plant in some areas. The commenter states concerns about the area under the towers, which cannot be cultivated and is a source of weeds.*

To the extent possible, Western would site transmission lines in existing ROWs and on the perimeter of farmland to limit conflicts with farming operations. Nevertheless, Western recognizes that farming practices may need to be altered to avoid facilities. When negotiating land acquisition with landowners, loss of use in the ROW and around the structures is taken into consideration. Even though landowners would be compensated for those areas removed from production, the landowners are allowed to continue farming under the conductors and around the structures as long as they can do so in a safe manner. Additionally, Western plans to use monopoles, which would eliminate the problem of weed growth often found between lattice structure legs.

I.21-2 *The commenter states that aerial application of seed, fertilizer, and chemicals is restricted by the presence of towers in fields, explaining that aerial applications are less accurate, especially on windy days as the planes*

have to fly higher over the towers and lines. The commenter references an instance where a field with transmission towers was not seeded with rice by air because of the windy conditions that day. The delay caused the soaked seed to develop a rice disease and “is present in this field, with a small yield effect.” The landowner states that “this disease organism can remain in the field and affect future rice crops.”

Analysis of aerial application of seed and pesticides is discussed on page 4-72, section 4.9.2.3, Impacts from Alternatives, in the Draft SEIS and EIR. This discussion provides details on the safety issues associated with crop-dusting operations near transmission lines. Utilities currently have numerous transmission lines operating within agricultural lands throughout California. Many of these lands currently use aerial spraying on a regular basis. Western would site transmission lines along roads, section lines, and adjacent to other features such as canals, levees, and utility ROWs to the extent possible.

- I.21-3 *The commenter states, “I have heard it said that landowners already impacted with transmission towers should have the new proposed lines located on their properties because they are ‘used to dealing with them.’ This concept is totally erroneous. I do not see how it is appropriate or fair for landowners already burdened by transmission towers to have additional transmission towers and lines placed on their properties.”*

Western does not support placing transmission lines on properties with existing lines because “landowners are used to dealing with them.” Western considered a spectrum of environmental and land use impacts when selecting the route alternatives. To the extent possible, Western would site transmission lines in existing ROWs and along the perimeter of farmland planning areas. In many cases this approach minimizes environmental and land use impacts because use of existing access roads can be optimized and these areas tend to act as natural transition areas.

- I.21-4 *The commenter states that “Alternative Route 2B, following the Pleasant Grove Creek Canal is the best alternative as it minimizes the impact on farming practices.”*

Comment noted.

- I.21-5 *The commenter states that he did not find in the Draft SEIS and EIR any discussion of the impacts on farming operations that he describes in his comments and he requests that the final report examine these issues.*

Western is aware of potential impacts on agricultural land uses and farming operations from the construction and operation of the proposed Project. During preparation of the Draft SEIS and EIR, staff thoroughly analyzed these impacts and developed EPMs to reduce the impacts to less-than-significant levels. See page 4-

72, section 4.9.2.3, of the Draft SEIS and EIR for a discussion of potential impacts on farming operations.

## 2.2.4 Public Forum Comments (Category PF)

### Response to Comment Set PF.1

#### Northern California Power Agency

- PF.1-1 *The Northern California Power Agency (NCPA) is an owner/member of the Transmission Agency of Northern California (TANC). NCPA states that TANC is evaluating a new transmission project, “Zeta,” which is proposed for the same vicinity and/or the same interconnection points as the proposed Project. NCPA requests that Western and its partners coordinate closely with TANC to site the proposed Project.*

TANC is in the early conceptual development stages of a project designated as “Zeta.” Potential participants in Zeta have yet to agree on terms for funding the development work, including engineering planning studies, environmental studies, and route selection. Feasibility work needs to be completed before it will be determined whether to pursue this project. Such feasibility work includes determining viability of routes. Final route selection is likely to be more than two years away; therefore, it would be premature and speculative to determine potential relative impacts or cumulative impacts of Western’s proposed Project and TANC’s Zeta project. In the event Zeta advances to a formal route selection stage, TANC, of which SMUD is a member organization, will conduct its routing efforts in recognition of the findings of and commitments made as part of Western’s proposed Project route selection process. SMUD has advised TANC to assure that the findings associated with the proposed Project are incorporated into the environmental review process for Zeta.

### Response to Comment Set PF.2

#### Individual Commenter PF.2

- PF.2-1 *The commenter asks, “Why can’t they hook on to the existing lines coming in from Shasta to the Elverta Substation?”*

See response to comment I.3-13.

- PF.2-2 *The commenter asks, “Why don’t you use land that isn’t good for farming, i.e., the old railroad line back on the drainage canal?”*

Alternative B includes the abandoned railroad ROW and is under consideration as one of the alternative routes analyzed in the SEIS and EIR.

- PF.2-3 *The commenter states that Alternatives A1, A2, and A3 will cross their land. Segment 2A5 will create a 90-*

degree corner on their land and make it impossible to fly seed and fertilizer. The commenter states, “This will greatly reduce our ability to farm—it will increase all the expenses of farming that ground.” The other A segments would also increase their costs.

Crop-dusting operations effectively occur in close proximity to transmission lines throughout California. Western understands that farming operations may need to change slightly as a result of transmission lines; however, transmission line siting will not prevent farming operations from taking place. Also refer to response to comment I.21-1 and page 4-72 of the Draft SEIS and EIR for a discussion of potential impacts to crop-dusting operations.

## Response to Comment Set PF.3

### Roseville Oral Public Comments

PF.3-1 *The commenter states that they take issue with Segments 2A1, 2A2, and 2A5. Segment 2A5 has a 90-degree angle and will “eliminate any chance of having airplanes fly.” The commenter states that it will increase their cost. The commenter clarifies the term “airplanes” to mean crop dusters to apply seed, fertilizer, and herbicides.*

See response to comment PF.2-3.

PF.3-2 *The commenter states that the transmission line will “decrease the value of our property... And it will definitely cost us part of our inheritance.”*

See response to comment I.8-2.

PF.3-3 *The commenter states, “I don’t understand why the other areas that do not have viable farm ground can’t be utilized rather than to come over ground that is already tillable.”*

Western analyzed the effects of the proposed Project relative to agricultural uses, including prime and unique farmland. A comparison of the alternatives is provided in Table B-1 of the Final SEIS and EIR. Each of the proposed alternatives would cross prime and unique farmland. Although Western sited proposed routes, to the extent possible, to follow boundaries, section lines, roads, and existing ROWs to minimize impacts to farming operations, no alternative would avoid agricultural lands entirely.

PF.3-4 *The commenter states that “Back in 1951 when they brought the power line down from Shasta down to Elverta Substation, they went through the property that we farmed; and from then on the airplanes would no longer fly that field, and it put us out of business.”*

See response to comment PF.2-3.

PF.3-5 *The commenter states that the transmission line was built in the middle of December and that ruts and railroad ties, used to remove tractors from the mud, were left on their ground. The commenter states, “...it destroyed the property pretty much and then we couldn’t farm under the lines anymore.”*

Western would implement several EPMs to prevent this type of damage from occurring. If damage does occur, Western would be responsible to repair damages or pay compensation according to the terms of the ROW agreement.

PF.3-6 *The commenter states that his property, on which he farms rice, would be affected by Segment 2C1. The commenter states that there are already “17 different transmission lines of some kind on our property” and that they have “already been put on notice by the tenant farmer and by the crop-dusting service that if they put any more towers on that property, they are not going to farm. It is too dangerous. They are already violating numerous FAA regulations because they have to fly under the wires.” The commenter states that seed can be applied from high up but chemicals must be applied “within 6 feet of the ground.”*

See response to comment PF.2-3. Page 4-72 of the Draft SEIS and EIR discusses in detail the potential impacts to crop-dusting operations. The Draft SEIS and EIR concludes that constructing and maintaining the proposed transmission lines would not preclude farming and are not expected to be significant impacts on farming practices because of the relatively small acreage involved.

PF.3-7 *The commenter states that “...the most correct route would be that [Segment] 2B. But in the [Draft SEIS and EIR] it says it’s been considered and rejected.” The commenter states his preference for Segment 2B because it goes along a canal where there are already transmission lines farther south, no houses farther north, and makes a straight line from Howsley Road down to Elverta.*

As described in Appendix A, section A.3.3, of the Draft SEIS and EIR, Alternative E3 consists of two components: 1) an alignment parallel to Segment 2B along the abandoned railroad ROW south of Sankey Road and 2) an alignment parallel to the existing active railroad ROW near the Natomas East Main Drainage Canal. Western engineers determined that the alignment along the existing active railroad ROW does not have adequate easement for a new 230-kV transmission line; however, Segment 2B, which includes the abandoned railroad ROW, remains under consideration as one of the alternative routes for the proposed Project.

PF.3-8 *The commenter asks why Western is sending the power to Elverta when “you are going to sell it to Roseville or some other place.” The commenter states that the power is from Yuba City. The commenter asks “Why*

*can't that power be sold to [Yuba City and Marysville] instead of putting these transmission lines down through farmers [lands], which is a pure headache out there?"*

As noted previously, Western sited proposed routes, to the extent possible, to avoid agricultural land. Even so, each alternative would affect farmland. A comparison of acres of disturbance by alternative is provided in Table B-1 of the Final SEIS and EIR

Also see response to comment I.3-18.

PF.3-9 *The commenter states, "Now we're going to fight you people over it because we have to carry, and this isn't enough, a million dollars' insurance in case someone hits one of them towers. You shouldn't put that liability on us."*

The United States is liable for losses arising from personal injury, death, or property damage caused by the negligent or wrongful act or omission of any United States employee while performing activities under the contract, in accordance with the Federal Tort Claims Act, as amended.

Western requires its contractors and agents to maintain sufficient insurance to cover liabilities for any claim for death, personal injury, or property damage caused by the contractors' and agents' activities under the contract.

Western will coordinate with landowners who would be affected by the acquisition of new ROW prior to construction. Western compensates landowners at the fair market value based on an independent appraisal.

PF.3-10 *The commenter states, "Now if you go through [a land owner's property] like you are going to, why can't you rent that property off of us instead of turning around, buying it and then giving it back to us?"*

As stated on page 4-81 in the Draft SEIS and EIR, in the event that business or residential structures would be displaced, Western would acquire land rights in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646), as amended. Western would purchase rights through negotiations with landowners at fair market value, based on independent appraisals. Landowners would retain title to the land and could continue to use the property in ways that would be compatible with the transmission line.

PF.3-11 *The commenter states, "You know what the expense is for us to keep the obnoxious weeds out from underneath the tower plus the liability we have? ... If you are going to go through us, why can't you rent that so at least we can have some money for the amount of insurance we have to carry, and a million dollars is nothing. We probably lose all of our property if some hired hand hit it."*

Western plans to use monopoles rather than lattice structures. Lattice structures allow for weeds to grow underneath, between the structure legs.

Western, as a Federal Agency, cannot obligate the government to payments beyond any given year of appropriations. Any annual rental payments would be contrary to the Antideficiency Act (31 U.S.C §§ 1341, *et seq.*).

Western acknowledges that the presence of transmission or distribution lines is one factor among many that may affect property values and planning. For any alternative selected, Western would acquire easements by providing just compensation to the landowner based on the fair market value of the land. The highest and best use of the land is considered in the appraisal of the land and easement

PF.3-12 *The commenter states, "And I think there is other means that you guys can do or other routes, and why put two – you are going to put two sets of towers on us, and it just ruins our property. And we sell it? You say you can use it. They can put houses. They can put parks up. You think those people are going to actually give us what they would if them towers wasn't there? ... I think there is other means or routes that you people can do instead of coming down. There is an old set of railroad tracks there..."*

To clarify, Western proposes to place a single transmission line carrying two circuits on one monopole structure. Western has developed three segments and seven alternatives to find a route with the least environmental impact.

PF.3-13 *The commenter states, "All of the rice farmers in Pleasant Grove that have been impacted by the towers that you erected 50 years ago are being hit again. It just seems very unfair that if you do have to go through farmland why are you hitting the same people again."*

Comment noted.

PF.3-14 *The commenter states, "Regarding segment one. You are going to parallel the existing line. Could you guys possibly use the existing power line and just run the wires double?"*

See response to comment I.3-13.

PF.3-15 *The commenter states, "In talking with a couple of [lawyers] about this issue about piling on to people who are already adversely affected. And the gist of the conversation was that it is not legal, that the government agencies have an obligation to spread the misery, and you can't keep piling on the same people just because somebody agreed back in 1900 to allow a right-of-way to come through, that you just keep piling on to those same people."*

To the extent possible, Western sited alternatives to use existing roads and project perimeters to minimize land use and visual impacts. In addition, Western used the Sacramento County Zoning Code (Section 301-11) as guidance to identify alternative routes throughout the study area. Refer to Appendix A of the Draft SEIS and EIR, which cites the Sacramento County Zoning Code (Sections 301-11) for siting electrical transmission lines of 100 kV or greater.

PF.3-16 *The commenter states, "I saw somewhere in the earlier environmental impact report when we went to another meeting like this in Pleasant Grove about a year ago. And there was published material that came out then that makes the incredible statement that as far as monetary remuneration to the people that are affected, and paraphrasing, basically said that they don't have to because they have already got the right-of-way from 1900."*

Western will coordinate with land owners who will be impacted by acquisition of new ROW prior to construction. Western will compensate the land owner at the fair market value of the property based on the determination of an independent appraiser. Portions of the proposed Project would be within existing ROW, for which compensation has been previously negotiated during the easement agreement process.

PF.3-17 *The commenter states, "And as far as visual effects to the area, basically what it said is you already got one ugly transmission line so two shouldn't make that much difference."*

Western is aware of the visual issues transmission lines may cause, as described in section 4.15, Visual Resources, of the Draft SEIS and EIR, and has developed EPM 97 to minimize these potential issues.

PF.3-18 *The commenter states, "You've got other alternative routes where there is no people, there is nothing there, no houses, no nothing. It is a straight line down to Elverta. Why zigzag through and pile on to the people that are already adversely being affected?"*

Comment noted.

## Response to Comment Set PF.4

### SMUD Oral Public Comments

PF.4-1 *The commenter states, "[Segment 2A5] will come across the entire southern part of our property where it will interfere with farming operations and also future development. I note that Alternative [Segment] 2A5 also comes through the middle of the parcel to the west of me and through the middle of the five parcels to the east... [Western] has identified at least two other locations. [Segment] 2B which runs along the Pleasant Grove Creek canal and over an abandoned railroad right-of-way and [Segment] 2C1 which runs over the existing right-of-way which will not effect property use,*

*property development or farming. According to the EIR, these alternatives have no additional impacts."*

Comment noted. Western recognizes challenges that may be faced when farming around transmission systems. These impacts are discussed in section 4.9 of the Draft SEIS and EIR. Efforts have been made to locate transmission towers where these impacts would be minimized. It is Western's determination that transmission lines are compatible with farming operations and will not limit access to the property. However, Western has developed EPMs (EPMs 74 through 83 in the Draft SEIS and EIR) to further reduce impacts.

To the extent possible, Western has sited the alternatives to minimize conflicts with planned projects in the study area. See Figure 4.9-3 of the Draft SEIS and EIR, which has been revised and is presented as Figure 3.3-1 in Chapter 3 of the Final SEIS and EIR.

PF.4-2 *The commenter states, "Along East Levee Road are all of our egress, go onto East Levee Road. So I know for a fact that you cannot build anything within 25 foot of that East Levee Road. So, from what I gather there is 125, a hundred-foot easement for that tower. So you add 25 or more ... to the 150, so you are getting away from the levee and that is where we built our homes... But what I am saying is encroachment on our property will ruin the integrity of our driveway and our lifestyle out there looking at towers, which would be, like, 50 foot from my bedroom window."*

Western has analyzed the potential impacts to property owners from construction and operation of transmission lines. Every effort has been made to locate transmission towers where these impacts would be minimized. Additionally, Western has developed EPMs to further reduce potential environmental impacts, including aesthetics. Please refer to Table C-1 of the Final SEIS and EIR for a list of EPMs.

The alignments analyzed in the Draft SEIS and EIR are considered preliminary for the purposes of environmental impact analysis. Exact alignment has not been determined and Western will make every reasonable effort to maximize the distance between the transmission line and existing homes, as much as the topography, existing infrastructure, and other factors allow. Western would not locate a transmission line centerline within 50 feet of an existing residence.

PF.4-3 *The commenter states, "And I recommend yes on C1 and yes on 2B, using the standards that Mr. Willey gave."*

Comment noted.

PF.4-4 *The commenter states, "One of those reasons that was told to us was because of Homeland Security. And if we look at the redundancy you are trying to create away*

from existing lines, sooner or later it comes back to the existing alignment before it gets up to the O'Banion Station. And you have most of this line still at risk. And any terrorist knows, okay, you don't attack this portion, but we do attack the place where they come back together on one side or the other."

See response to comment C.4-2.

PF.4-5 *The commenter states, "One of the things that came up through this process [Joint Vision Area], after we took a look at the alignment, the blueprint called for – the SACOG blueprint plan called for various areas as shown as development and open space. On your plan you've got [Segment] 2A5 shown at what has been called the community separator. The City adopted a map that said one mile of community separator. The County has not. There is not a full recognition of exactly one mile from the county line. I think that is where the K5 line came from."*

Comment noted. Please see responses to comments in comment set C.4 regarding regional planned development.

PF.4-6 *The commenter states, "Second of all, if you sit down and take a look at trying to incorporate the development, a number of these lines create conflicts with infrastructure, not the least of which is Elverta where it comes into contact with Highway 99. There will be a future interchange that CalTrans is currently reviewing for a study report and existing widening as it relates to Elverta Villages, and the County has those on record. I think you are going to be heading into future conflicts with those."*

Western has been in consultation with Caltrans and is aware of planned and proposed infrastructure projects. Western will continue to coordinate with Caltrans. It is Western's determination that the proposed Project is compatible with planned and proposed transportation improvement projects. See responses to Department of Transportation comments in comment set A.5.

PF.4-7 *The commenter states, "One of the items that comes into conflict is future drainage infrastructure. And as we know in the Natomas Basin, this is the number one issue in terms of how we deal with that. In particular, our group has sat down and has taken a look at a possible configuration for a drainage facility that provides a community separator that will include, primarily, a habitat north of the lake, and south of the lake we would have development. This would provide a buffer between human interaction and the habitat areas. [Segment]*

*2A5 runs right through the middle of that and would the[n] create future conflicts."*

See responses to comments in comment set C.4 regarding regional planned development.

PF.4-8 *The commenter states, "Potential school siting conflicts is another issue. Anytime that you get into development we start taking a look at the radius that you need to position both elementary, middle and high schools. And we've taken some representations and put those into our plan. As you can see, a number of the alignments you cut right through that school or near a school. That we know will be an issue."*

See responses to comments in comment set C.4 regarding regional planned development.

PF.4-9 *The commenter states, "Visual intrusion would be obvious, especially when you are looking at [Segments] 2A4, 2A3 and anywhere where the lines run parallel to [Highway] 99. This is a big issue to both the agencies involved and also from the landownership perspective, that this would be the first thing you see when you come into this area."*

See responses to comments in comment set C.4 regarding regional planned development.

PF. 4-10 *The commenter states, "I think a number of homeowners that are along the East Levee Road have already spoken. I am sure more will. That is another issue for the existing situation, separate from development interests, that it is creating an issue. In the meantime, all this will boil down to more cost and maybe what [Western] had planned on for this effort, trying to come through this development area, it would seem better to take maybe some of the other routes, [Segments] 2C1, 2B2, to avoid some of these impacts."*

Comment noted.

PF.4-11 *The commenter states, "... I think it would be better to sit down and take some of the information today and look at how to coordinate the alignment with the future development interests, future habitat and open space interests and try to minimize the impact on the existing homeowners in the area."*

Comment noted. Western will take into consideration all comments provided during the final decision-making process. Western has developed EPMS to minimize environmental impacts associated with the construction and operation of the proposed Project.





# 3.0 Modifications, Addenda, and Corrections

## CHAPTER 3.0 MODIFICATIONS, ADDENDA, AND CORRECTIONS

Information in this chapter addresses modifications, addenda, and corrections to the Draft SEIS and EIR.

### 3.1 MODIFICATIONS

#### 3.1.1 Modification to Draft SEIS and EIR Chapter 3, Alternatives, Section 3.2.2.6, Segment 2B – Cross Canal to Elverta Substation – Abandoned Railroad Right-of-Way Alignment

Western provides clarification on the location of Segment 2B along the abandoned railroad ROW. The proposed location would be within or immediately adjacent to the existing abandoned railroad ROW. It would be located along the East Levee Road, likely along the toe of the levee on either side. The northeast side is currently occupied by a distribution line owned and operated by Pacific Gas and Electric. Use of this side of the levee would require that this line either be relocated or be rebuilt underground. The southwest side of the levee is primarily owned and managed by Reclamation District 1000.

#### 3.1.2 Modification to Draft SEIS and EIR Chapter 3, Alternatives, Section 3.4.10, Structures

Western received feedback from the public that monopoles are preferable to steel lattice structures. Western plans to use monopole structures for the proposed Project. In certain circumstances, to accommodate unique or challenging terrain or soils, transmission design may require the occasional use of steel lattice structures. An example of this type of structure is shown in Figure 3.1-1.

#### 3.1.3 Modification to Draft SEIS and EIR Chapter 4, Affected Environment and Environmental Consequences, Section 4.3, Cultural Resources

In consultation with the California State Historic Preservation Office (SHPO), Western has determined that a programmatic agreement (PA) pursuant to 36 CFR Part 800, the implementing regulations for compliance with Section 106 of the National Historic Preservation Act, would be required to satisfy Western's obligations under Section 106. The PA will stipulate the process and procedures Western will follow prior to Project activities to identify and survey areas that were not accessible during the initial surveys and that might be affected by Project activities. The PA will require that Western, in consultation with the SHPO, the Advisory Council on Historic Preservation, affected tribes, the City of Roseville, and SMUD, make a reasonable and good-faith effort to identify all historic properties that could be affected by Project-related activities. The PA will stipulate procedures to determine which historic properties meet the eligibility criteria for listing in the National Register of Historic Places and will define mitigation measures to avoid or minimize any adverse effects to historic properties. The PA will stipulate Western's responsibilities regarding any future changes in the project area of potential effect, future survey requirements, inadvertent

discoveries, and future consultation. All references to traditional Section 106 consultations in the Draft SEIS and EIR are modified to comply with the PA process, procedures, and commitments.

#### 3.1.4 Modification to Draft SEIS and EIR, Chapter 4, Affected Environment and Environmental Consequences, Section 4.9, Land Use, Table 4.9-2, Existing and Proposed Specific Plans, Developments, and Sensitive Areas

In this table, the Placer Vineyards Specific Plan is updated to reflect the approval of the project by the Placer County Board of Supervisors on July 16, 2007. The table is not reprinted in its entirety in the Final SEIS and EIR; the revised portion is presented as Table 3.1-1 at the end of this chapter.

#### 3.1.5 Modification to Draft SEIS and EIR Appendix A, Alternatives Development, Section A.3.3 Segment E3 – Existing Railroad Corridor

A commenter had a question regarding whether Segment 2B was eliminated from full analysis in the Draft SEIS and EIR. Western provided clarification at each of the public forum hearings and sent out a mailer on August 22, 2007, to clarify. The following paragraph modifies section A.3.3 of the Draft SEIS and EIR as follows:

As described in Appendix A, section A.3.3, of the Draft SEIS and EIR, Alternative E3 consists of two components: 1) an alignment parallel to Segment 2B along the abandoned railroad ROW south of Sankey Road and 2) an alignment parallel to the existing active railroad ROW near the Natomas East Main Drainage Canal. Western engineers determined that the alignment along the existing active railroad ROW does not have adequate easement for a new 230-kV transmission line; however, Segment 2B, which includes the abandoned railroad ROW, remains under consideration as one of the alternative routes for the proposed Project.

#### 3.1.6 Modification to Draft SEIS and EIR Appendix B, Calculations of Disturbances for Each Segment and Alternative, Table B-1, Summary of New Disturbance and Impacts to Various Resources

Western received several comments on Table B-1 of the Draft SEIS and EIR. The table was interpreted in varying ways, primarily because the title led readers to believe that the total acres in the ROW would all be disturbed. Only acres depicted under "disturbance" headings would be affected for their respective resources. Western has modified the title of Table B-1 to "Summary of Proposed Project Specifications, Disturbances, and Impacts to Various Resources within the ROW" to clarify this.

The revised Draft SEIS and EIR Table B-1 is presented as Table B-1 in Appendix B of the Final SEIS and EIR. Footnotes have been changed to describe how the numbers were calculated. When calculating long- and short-term disturbances to different areas, such as rice fields, either a straight ratio of farmland acreage to total acreage was used or the ratios were modified as described in the footnotes in Table B-1 of Appendix B.

## 3.2 ADDENDA

### 3.2.1 Supplemental Information to Draft SEIS and EIR, Chapter 4, Affected Environment and Environmental Consequences, Section 4.1, Air Quality

The U.S. EPA recommended discussing the potential issues associated with PM<sub>2.5</sub> emissions. The following text responds to this recommendation:

In general, for every pound of PM<sub>10</sub> emissions created during construction, there are approximately 0.2 pounds of PM<sub>2.5</sub> emissions. There is generally a one to one relationship between PM<sub>10</sub> and tailpipe emissions from construction equipment. As described in Table 4.1-6 of the Draft SEIS and EIR, most of the alternatives would generate approximately 12 pounds per day of PM<sub>10</sub> emissions. As a result, Western would expect approximately 2.4 pounds per day of PM<sub>2.5</sub> emissions. EPMs 1 through 14 would minimize PM<sub>10</sub> and PM<sub>2.5</sub> emissions.

### 3.2.2 Supplemental Information to Draft SEIS and EIR, Appendix C, Table C-1, Environmental Protection Measures

Western has added supplemental EPMs to Table C-1 in response to comments received on the Draft SEIS and EIR. The new table with all EPMs can be found in Appendix C of the Final SEIS and EIR. Additional EPMs are provided below.

#### EPM 102

- Western would fence sensitive resources prior to construction activities. Limited construction periods may apply to those sensitive resources identified through section 7 consultation.

#### EPM 103

- In the event that prehistoric archaeological resources are discovered during ground-disturbing activities, all work in the vicinity of the find would be halted until such time that a qualified archaeologist could assess the significance of the find. Western would also contact interested tribe(s) as soon as possible. If the find were determined to be legally significant by the archaeologist, or to be culturally important to a tribal community, the project representative would meet with the archaeologist and interested tribe(s) to determine the appropriate course of action.

#### EPM 104

- If human remains are discovered, Western would immediately notify the county coroner to identify origin and disposition pursuant to California Public Resources Code Section 5097.98.

## 3.3 CORRECTIONS

The following sections describe corrections to the Draft SEIS and EIR. ~~Strikeout~~ indicates where wording is deleted and underline indicates where wording is added to correct the Draft SEIS and EIR.

### 3.3.1 Correction to Draft SEIS and EIR, Chapter 4, Affected Environment and Environmental Consequences, Section 4.2.2.5, Cumulative Impacts

The Natomas Basin Conservancy commented on the conclusions that were presented in section 4.2.2.5, Cumulative Impacts. The third and fifth paragraphs of this section have been corrected as follows:

#### 4.2.2.5 Cumulative Impacts

Fragmentation and loss of habitat have contributed to declines in these species' populations, principally as a result of urban development and conversion of native habitat to agriculture (Ehrlich 1988; Klute et al. 2003; USFWS 1999; Wilcox and Murphy 1985; Woodbridge 1998). ~~Consultation with the appropriate agencies would determine what mitigation may be required to offset impacts to threatened or endangered species habitat; therefore this project would not contribute to a loss of habitat.~~

Within the study area, the USFWS provides a mechanism for protecting special-status species and habitats through the development of HCPs. Part of the Project area lies within the boundaries of the NBHCP, as well as other HCPs that have yet to be finalized but are imminent. These plans provide for limited authorized development for Land Use Agency permittees. The NBHCP was established to promote biological conservation, along with agricultural and economic development, and is designed primarily to protect the Swainson's hawk and the giant garter snake, and, secondarily, a variety of wetland, upland, and vernal pool special-status species. ~~The expected planned growth within the Sacramento area would result in loss of habitat for special status species. By participating with consulting agencies, HCP, and other conservation and mitigation efforts, these losses would be reduced to less than significant.~~

### 3.3.2 Correction to Draft SEIS and EIR Chapter 4, Affected Environment and Environmental Consequences, Figure 4.9-3, Existing Proposed Plans, Developments, and Sensitive Areas

The Sierra Vista Specific Plan planning area identified in Figure 4.9-3 should extend an additional 250 feet to the west of the boundary shown in the Draft SEIS and EIR. Figure 4.9-3 has been revised to reflect this correction and is presented as Figure 3.3-1 in the Final SEIS and EIR.

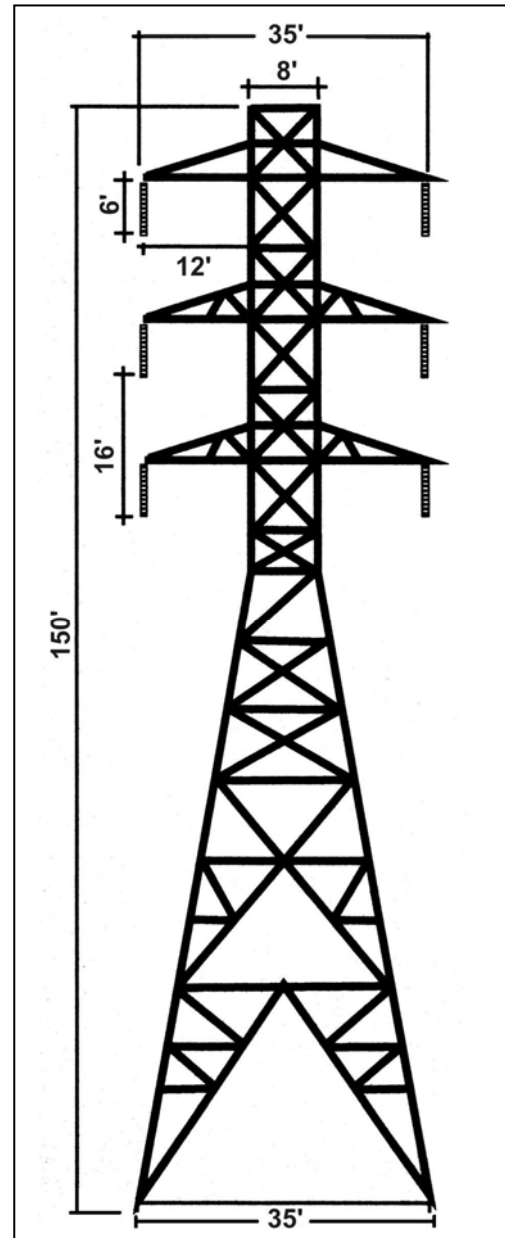
### 3.3.3 Correction to Draft SEIS and EIR Chapter 4, Affected Environment and Environmental Consequences, Section 4.17.2.6, Summary of Impacts

The U.S. EPA identified several discrepancies between the numbers presented in section 4.17.2.6 and the numbers presented in Table B-1 of the Draft SEIS and EIR. The numbers provided for wetlands in section 4.17.2.6 have been changed to reflect the correct acreages provided in Table B-1 of the Draft SEIS and EIR, as follows:

#### 4.17.2.6 Summary of Impacts

While minor differences occur among the levels of disturbance for wetlands, Western would consult with the appropriate agencies prior to beginning construction activities. Complying with EPMS and consultation would prevent the Project from causing significant direct, indirect, or cumulative impacts. ~~Table 4.17-3 presents impacts to wetlands from each alternative.~~ Alternative B would cross over the most wetlands (~~29.6~~ 19.5 acres) and would have the greatest direct impact (~~3.4~~ 2.4 acres long term). ~~Alternative A4 would cross over the fewest wetlands (11.5 acres) and would have 1.0 acres of long term impacts.~~ Each of the A Alternatives would cross approximately 8.1 acres of emergent wetlands and permanently disturb 1.0 acre.

Figure 3.1-1 Typical 230-kV Lattice Steel Tower

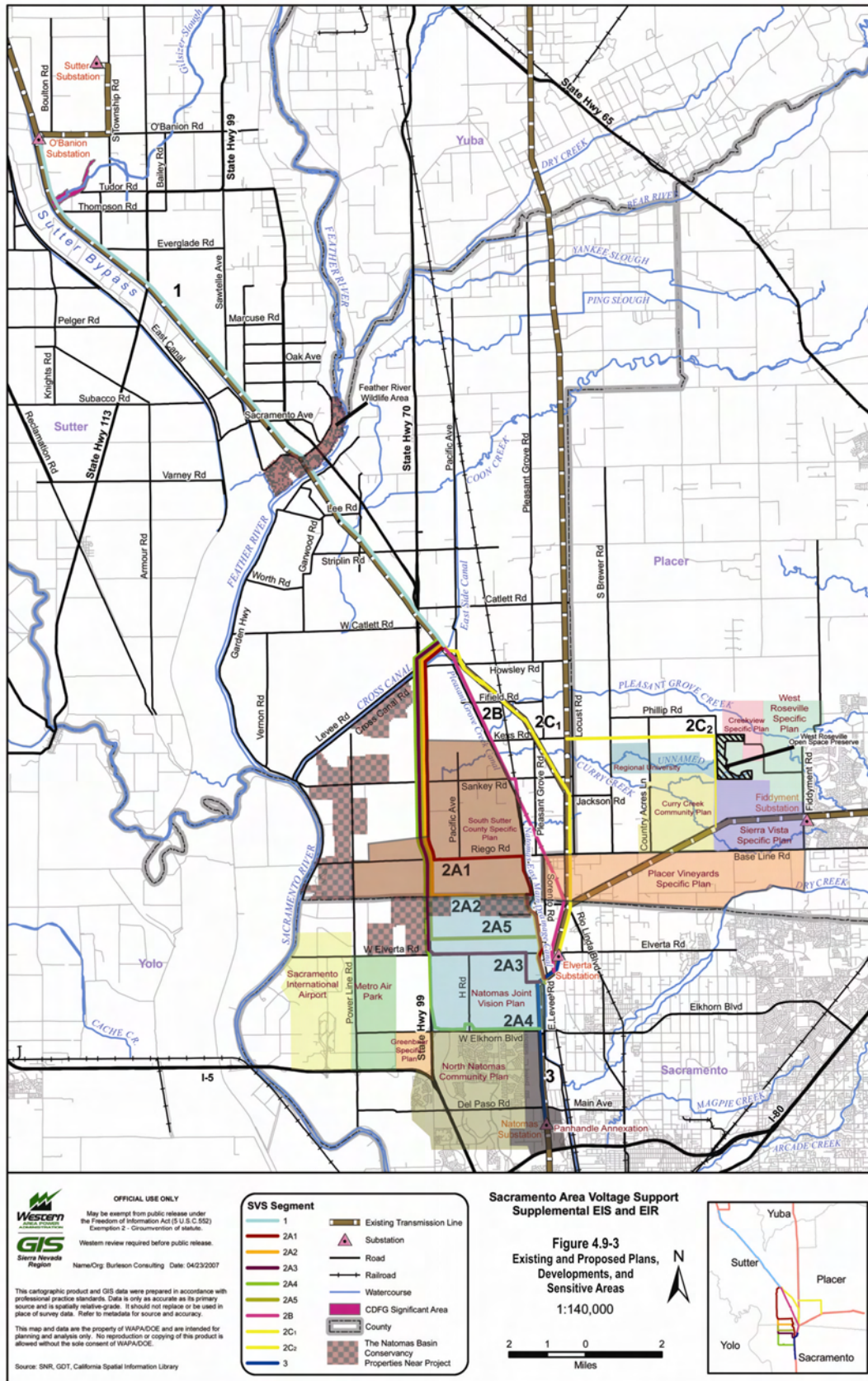


**Table 3.1-1 Existing and Proposed Specific Plans, Developments, and Sensitive Areas (Revised)**

**Table 4.9-2 Existing and Proposed Specific Plans, Developments, and Sensitive Areas**

<b>Plan/Proposed Development (reference)</b>	<b>Description</b>	<b>Status</b>	<b>Proximity to Study Area</b>
<p><b>Placer Vineyards Specific Plan (City of Roseville GIS 2007)</b></p>	<p>The Placer Vineyards Specific Plan project is a mixed-use master planned community with residential, employment, commercial, open space, recreational and public/quasi-public land uses. The plan provides for 14,132 homes in a range of housing types, styles, and densities.</p>	<p>The Placer County Board of Supervisors approved this project on July 16, 2007.</p>	<p>Segments 2B and 2C<sub>1</sub> would pass through this area. No utility corridors were identified that would conflict.</p>

Figure 3.3-1 Existing and Proposed Plans, Developments, and Sensitive Areas (Revised)





# 4.0 References

## CHAPTER 4.0 REFERENCES

In addition to the references listed in Chapter 9 of the Draft SEIS and EIR, the following references were identified for the Final SEIS and EIR.

- APLIC 2006..... “Suggested Practices for Raptor Protection on Powerlines: The State of the Art in 2006” Avian Powerline Interaction Committee. Edison Electric Institute, APLIC, and the California Energy Commission. Washington, DC and Sacramento, California.
- DHS 1999..... “Short Fact Sheet on EMF” Department of Health Services, Health and Human Services Agency, State of California, 1999.
- URS Corporation 2004..... “Mitigation Monitoring Report for the Solano County Health and Social Services Facility,” prepared for Solano County Division of Architectural Services, Fairfield, California, 2004.
- USFWS 2003..... “Intra-Service Biological and Conference Opinion on Issuance of a Section 10(a)(1)(B) Incidental Take Permit to the City of Sacramento and Sutter County for Urban Development in the Natomas Basin, Sacramento and Sutter County, California” Sacramento Fish & Wildlife Office, June 2003.
- Western 2007..... “Sacramento Area Voltage Support Draft Supplemental Environmental Impact Statement and Environmental Impact Report” Western Area Power Administration. Folsom, California. July, 2007.





## 5.0 Supplemental Impact Statement and Environmental Impact Report Recipients

## CHAPTER 5.0 SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT AND ENVIRONMENTAL IMPACT REPORT RECIPIENTS

The following matrices present a listing of the agencies, organizations, and individuals receiving the Sacramento Area Voltage Support Final Supplemental Environmental Impact Statement and Environmental Impact Report (SEIS and EIR).

### Final SEIS and EIR Recipients – Agencies

California Department of Fish and Game Eng, Larry 1416 Ninth Street Sacramento, CA 95814	California Department of Fish and Game Marr, Jenny C. 1100 Fortress Avenue, Suite 2 Chico, CA 95973	California Department of Fish and Game Smith, Kent 1701 Nimbus Road, Suite A Rancho Cordova, CA 95670
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California Department of Transportation, District 3 Office Of Transportation Planning East Sacramento Area Office Tinney, Marlo Venture Oaks - MS15 P.O. Box 942874 Sacramento, CA 94274-0001	California Department of Transportation, District 3 Office of Transportation Planning South Sacramento Area Office De Terra, Bruce Venture Oaks - MS15 P.O. Box 942874 Sacramento, CA 94274-0001	California Department of Transportation, District 3 Costa, Bill P.O. Box 942874 Sacramento, CA 94274-001
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<p>Grant Union High School District                  1333 Grand Avenue                  Sacramento, CA 95838</p>	<p>Grant Joint Union High School District                  Branum, Larry                  1333 Grand Avenue                  Sacramento, CA 95838</p>	<p>Grant Joint Union High School District                  Raymond, John                  1333 Grand Avenue                  Sacramento, CA 95838</p>
<p>Grant Joint Union High School District                  Facilities                  Herrington, Orrick                  777 S. Figuero Street, Suite 3200                  Los Angeles, CA 90017</p>	<p>Native American Heritage Commission                  Myers, Larry                  915 Capital Mall, Room 364                  Sacramento, CA 95814</p>	<p>Natomas Central Mutual Water Co.                  2601 W Elkhorn                  Rio Linda, CA 95673</p>
<p>Natomas Community Advisory Council                  Natomas Service Center                  3291 Truxel Road #26                  Sacramento, CA 95833</p>	<p>Natomas Unified School District                  1515 Sorts Drive #1                  Sacramento, CA 95834</p>	<p>Northern California Power Agency                  Engelbrite, Nannette                  180 Kirby Way                  Roseville, CA 95678</p>
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<p>Placer County Transportation Planning                  Agency                  299 Nevada Street                  Auburn, CA 95603</p>	<p>Reclamation District 1000                  Devereux, Paul                  1633 Garden Highway                  Sacramento, CA 95833-9706</p>	<p>Rio Linda Water District                  730 L Street                  Rio Linda, CA 95673</p>
<p>Sacramento and San Joaquin                  Drainage                  Reclamation Resource                  P. O. Box 942836                  Sacramento, CA 95814</p>	<p>Sacramento Area Flood Control                  Agency                  1007 7th Street, 7th Floor                  Sacramento, CA 95814</p>	<p>Sacramento Central Library                  828 I Street                  Sacramento, CA 95814-2508</p>
<p>Sacramento County Airport System                  6900 Airport Boulevard                  Sacramento, CA 95837</p>	<p>Sacramento County Department of                  Environmental Review and                  Assessment                  827 7th Street, Room 220                  Sacramento, CA 95814</p>	<p>Sacramento County Department of                  Transportation                  Werth, Scott                  906 G Street, Suite 510                  Sacramento, CA 95814</p>
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<p>Sacramento County Regional                  Sanitation District                  Arshad, Humera                  10545 Armstrong Avenue #101                  Sacramento, CA 95655</p>	<p>Sacramento Metropolitan Air Quality                  Management District                  Anderson, Charles                  777 12th Street, 3rd Floor                  Sacramento, CA 95814</p>	<p>Sacramento Metropolitan Air Quality                  Management District                  Borkenhagen, Jeane                  777 12th Street, 3rd Floor                  Sacramento, CA 95814</p>

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### Final SEIS and EIR Recipients – Organizations

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Marysville Appeal Democrat Kruger, Harold P.O. Box 431 Marysville, CA 95901	McDonough Holland & Allen Prock, Marnie 555 Capital Mall, 9th Floor Sacramento, CA 95814	MD Partnership & Dunmore Sidn 2150 Professional Drive Roseville, CA 95661

Morrison 2000 and Morrison C Ranch 3558 Howsley Road Pleasant Grove, CA 95668	Mourier Investments, LLC 1430 Blue Oaks Boulevard, Suite 190 Roseville, CA 95668	Native American Heritage Commission Myers, Larry 915 Capital Mall, Room 364 Sacramento, CA 95814
Natomas Basin Conservancy Roberts, John 2150 River Plaza Drive, Suite 460 Sacramento, CA 95833	Navigant Consulting, Incorporated Forman, John S. 3100 Zinfandel Drive, Suite 600 Rancho Cordova, CA 95670	Niegel Land and Development Corporation Niegel, Larry 4906 Pleasant Grove Road Pleasant Grove, CA 95668
Pacific Gas & Electric Environmental Affairs Program Manager Ross Leech, Diane Mail Code B24A P.O. Box 7640 San Francisco, CA 94120	Phillip N & DL Morrison Trust P.O. Box 632 Pleasant Grove, CA 95668	PL Roseville, LLC 4196 Douglas Boulevard, Suite 100 Granite Bay, CA 95746
Remy Thomas, Moose & Manley Adap-Parafina, Shalimar 455 Capital Mall, Suite 210 Sacramento, CA 95814	Remy Thomas, Moose & Manley Quinn, Megan 455 Capital Mall, Suite 210 Sacramento, CA 95814	Richland Planned Communities, Incorporated Chambers, Tom 2220 Douglas Boulevard, Suite 290 Roseville, CA 95661
Richland Planned Communities, Incorporated Kollen, Tom 2220 Douglas Boulevard, Suite 290 Roseville, CA 95661	Richter-Kazer 1993 IT 1993 3017 Douglas Boulevard, Suite 300 Roseville, CA 95661	Sandberg, Lo Duca & Aland, LLP Lo Duca, Marcus J. 3300 Douglas Boulevard # 365 Roseville, CA 95661
SCE Gurrola, Manuel 2244 Walnut Grove Avenue GO1 Quad 3A Rosemead, CA 91770	Scheidel and Osterli Land Company 1510 W. Catlett Road Pleasant Grove, CA 95668	Shaw, John CPA 2200 Douglas Boulevard #250-B Roseville, CA 95661
Shingle Springs Band of Miwok Indians Murray, Jeff P.O. Box 1340 Shingle Springs, CA 95682	Sills Farm General Partnership 5072 Pacific Avenue Pleasant Grove, CA 95668	South Sutter, LLC 1075 Creekside Ridge Drive, Suite 110 Roseville, CA 95678
Sutter Project, General Manager Royall, Steve 5029 S. Township Road Yuba City, CA 95993	Truong Capital Adventures, LLC 5412 Madison Avenue, Suite 180 Sacramento, CA 95841	URS Corporation Rushmore, Kathy 221 Main Street, Suite 600 San Francisco, CA 94105-1917
Valley Land Corporation Christie, John 7700 College Town Drive #101 Sacramento, CA 95826	Valley View Investors 7700 College Town Drive, Suite 101 Sacramento, CA 95826	Vaquero Land Holdings, LLC Heintz, Mark 4855 Ketcham Court Granite Bay, CA 95746
Westervelt Ecological Services, LLC 1400 Jack Warner Parkway NE Tuscaloosa, AL 35404	Wildlands Incorporated Mathews, Jeff 3855 Atherton Road Rocklin, CA 95765	

### Final SEIS and EIR Recipients – Private Individuals

Ahart, Louise Marysville, CA 95901	Akers, Sam & Jennifer Elverta, CA 95626	Allen, Wayne Nevada City, CA 95959
---------------------------------------	--	---------------------------------------

Ansbro, Eric Elverta, CA 95626	Arbios, Zachary & Gaelin Elverta, CA 95626	Artrip, Gregory and Shelley Elverta, CA 95626
Barosso, Hazel Pleasant Grove, CA 95668	Bianchi, Gertrude Elverta, CA 95626	Bianchi, John Pleasant Grove, CA 95668
Borgman, Melvin J. and Charlotte E. Pleasant Grove, CA 95668-0743	Borgman, Tina Pleasant Grove, CA 95668	Brooks, Elton & Patricia Elverta, CA 95626
Brown, Bill and Sharon Elverta, CA 95626	Brown, Judy Pleasant Grove, CA 95668	Burnsed, George and Betty Elverta, CA 95626
Burnsed, Shawn & Brandi Elverta, CA 95626	Jennifer Callan Daly City, CA 94015	Ken Cayocca Sacramento, CA 95834
Chon, Hank Pleasant Grove, CA 95668	Christie, Chris Elverta, CA 95626	Cleary, James & Janet Sacramento, CA 95835
Coburn, Roland & Yolanda Elverta, CA 95626	Compton, Lewis Delmar & Sara Elverta, CA 95626	James and Janice Crabtree Elverta, CA 95626
Dettling, Darrell J. Sacramento, CA 95864	Driggs, Richard and Judith Elverta, CA 95626	Enos, Rose Auburn, CA 95603
Fales, Michael & Michelle Staas-Fales Nicolaus, CA 95659	Franklin, Emma Sacramento, CA 95833	Frederick, James and Jean Elverta, CA 95626
Gardner, Robert and Rochelle Elverta, CA 95626	Gerolamy, Rob & Mary Elverta, CA 95626	Gianella, Elizabeth Yuba City, 95992
Gianella, Tom & Elizabeth Yuba City, CA 95991	Hanson, Eric St. Helena, CA 94574	Hart, James and Cheryl Elverta, CA 95626
Hendrix, Dik Elverta, CA 95626	Hendrix, Richard and Lois Elverta, CA 95626	Henton, Fred Pleasant Grove, CA 95668
Holzmeister, Rich Elverta, CA 95626	Hussain, Dr. Nihad A. Sacramento, CA 95825	James, Lauren Pleasant Grove, CA 95668
James, Norman Pleasant Grove, CA 95668	Jones, Jeff Roseville, CA 95661	Keenan, Wendall Pleasant Grove, CA 95668
Klasson, Mick Davis, CA 95616	Koo, Haesun Los Angeles, CA 90049	Krause, Gary El Dorado Hills, CA 95712
Krumenacher, Alice & Marie Rio Linda, CA 95673	Lamar, John and Sally Pleasant Grove, CA 95668	Lee, Jong-II Marcus Schereville, IN 46375
Lienert, Albert and Shirley Nicolaus, CA 95659	Linn, Leland Pleasant Grove, CA 95668	Logsdon, Robert & Deborah Elverta, CA 95626
Long, Marion Fair Oaks, CA 95628	Lutz, Aleta Pleasant Grove, CA 95608	Manich, Stephen Pleasant Grove, CA 95668
Marine, Joe Sacramento, CA 95822	Meyers, Barbara Elverta, CA 95626	Miller, Anthony Pleasant Grove, CA 95668
Moore, Sean and John Elverta, CA 95626	Morgan, Ernest Elverta, CA 95626	Niegel, Gregory Pleasant Grove, CA 95668
Ose, Doug Sacramento, CA 95865	Phifer, Delbert Homedale, ID 83628	Plancarte, Maria Rio Linda, CA 95673
Rai, David Yuba City, CA 95993	Renison, Dewayne and Joyce Elverta, CA 95626	Richie, Charles Huntington Beach, CA 92648

Ripchick, Anthony & Susan Elverta, CA 95626	Royer, Tina Rio Linda, CA 95673	Schiedel, La Verne Elverta, CA 95626
Scheidel, Silmer Pleasant Grove, CA 95668	Sharma, Ritu Pleasanton, CA 94588	Simangan, Ryman, Nyrna & Steve Sacramento, CA 95835
Stewart, Barbara Elverta, CA 95626	Stultz, Sue Elverta, CA 95626	Thao, Yee & Yang Elverta, CA 95626
Titone, John Sacramento, CA 95835	Toler, Lana Pleasant Grove, CA 95668	Tomich, Paul Auburn, CA 95603
Van Dyke, Gary Pleasant Grove, CA 95668	Viducich, Mark and Catherine Pleasant Grove, CA 95668	Vinci, Cari Lincoln, CA 95648
Wallace, Robert & Shirley Pleasant Grove, CA 95668	Wiley, Ed Sacramento, CA 95837	Willeford, Danny & Eloise Pleasant Grove, CA 95668





# Appendices



# Appendix A. Public and Agency Comments

**Comment Set A.1**  
**U.S. Department of the Interior**



**United States Department of the Interior**

OFFICE OF THE SECRETARY  
Washington, DC 20240



ER 07/611

July 27, 2007

Mr. Steve Tuggle  
Natural Resources Manager  
Western Area Power administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630

Mr. Tuggle:

This is in regard to the Department of the Interior's review of the Draft Supplemental Environmental Impact Statement for the Sacramento Area Voltage Support Project.

This is to inform you that the Department may have comments, but will be unable to reply within the allotted time because we received the copies of the DSEIS today only. Please consider this letter as a request for an extension of time in which to comment.

Our comments, if any, should be available by September 4, 2007

Sincerely,

A handwritten signature in black ink that reads "Vijai N. Rai".

Vijai N. Rai  
Team Leader, Natural Resources  
Management  
Office of Environmental Policy  
and Compliance

**Comment Set A.1, cont.**  
**U.S. Department of the Interior**



**United States Department of the Interior**

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Pacific Southwest Region  
1111 Jackson Street, Suite 520  
Oakland, California 94607

IN REPLY REFER TO:  
ER#07/611

*Filed Electronically*

September 7, 2007

Mr. Steve Tuggle, Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630  
svs-seis@wapa.gov

Subject: Review of Draft Supplemental Environmental Impact Statement (DSEIS) for the  
Sacramento Area Voltage Support Project, Sacramento, Sutter and Placer  
Counties, CA

Dear Mr. Tuggle:

The Department of the Interior has received and reviewed the subject document and has no  
comments to offer.

A.1-1

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port  
Regional Environmental Officer

cc:  
Director, OEPC  
FWS, CNO

**Comment Set A.2**  
**U.S. Environmental Protection Agency**



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

August 27, 2007

Steve Tuggle  
Natural Resources Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

Subject: Supplemental Draft Environmental Impact Statement (SDEIS) for Sacramento Area Voltage Support Project, California (CEQ Number: 20070284).

Dear Mr. Tuggle:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. This letter provides a summary of EPA's concerns. Our detailed comments are enclosed.

EPA reviewed the Draft EIS (DEIS) for the proposed Sacramento Area Voltage Support Project, and provided comments to the Western Area Power Administration (WAPA) on December 26, 2002. EPA also reviewed the Final EIS (FEIS) and provided comments to the Western Area Power Administration on October 20, 2003. In response to our comments, Western Area Power Administration provided additional information on measures to address air quality, wetlands impacts, and threatened and endangered species. The FEIS also clarified the coordination that would occur between WAPA and appropriate agencies in both planning and construction phases to assure the minimization of environmental impacts. We commend WAPA for its incorporation of construction emissions mitigation measures into the proposed project.

EPA has reviewed the additional information provided in the SDEIS and has concerns regarding potential impacts to air quality, water resources, and biological resources from the proposed alternatives. Due to these concerns, we have rated this SDEIS as EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). We recommend WAPA select a Preferred Alternative with the least environmental impacts. Specifically, we are concerned about potential impacts to air quality and aquatic resources from the Proposed Alternatives. Based on our review we recommend choosing Alternative A1, A2, A4, or A5 as the Preferred Alternative because they would have the least impacts to air quality

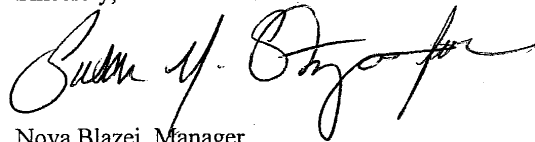
*Printed on Recycled Paper*

**Comment Set A.2, cont.**  
**U.S. Environmental Protection Agency**

and aquatic resources. We further recommend limiting operating periods and fencing sensitive resources, such as vernal pools, during construction.

We appreciate the opportunity to review this SDEIS, and we are available to discuss our recommendations. Please send two copies of the Supplemental Final EIS (SFEIS) to the address above (mail code: CMD-2) when it becomes available. If you have questions, please contact me at 415-972-3846, or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or [fujii.laura@epa.gov](mailto:fujii.laura@epa.gov).

Sincerely,



Nova Blazej, Manager  
Environmental Review Office  
Communities and Ecosystems Division

Enclosures: Summary of the EPA Rating System  
Detailed Comments

cc: Robert Eckart, Bureau of Reclamation  
Michael Jewell, US Army Corps of Engineers

**Comment Set A.2, cont.**  
**U.S. Environmental Protection Agency**

**SUMMARY OF EPA RATING DEFINITIONS**

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

**ENVIRONMENTAL IMPACT OF THE ACTION**

***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

**ADEQUACY OF THE IMPACT STATEMENT**

***Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

**Comment Set A.2, cont.**  
**U.S. Environmental Protection Agency**

EPA DETAILED COMMENTS ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR SACRAMENTO AREA VOLTAGE SUPPORT, CA, AUGUST 27, 2007.

**Alternatives**

Based on our review we note that Alternatives A1, A2, A4, and A5 appear to have the least environmental impacts, and Alternatives B, and C have comparatively greater air quality and aquatic impacts. While each of the Proposed Alternatives impact environmental resources, A1, A2, A4, and A5 Alternatives have the least environmental impacts as compared to the other alternatives. Alternative A3 could have significant environmental impacts due to right-of-way (ROW) crossings potentially affecting 9.2 acres of vernal pools. Further, this alternative has the potential to impact wetlands due to the installation of 6 structures in wetland areas (Table 3-4). The SDEIS identifies Alternative C as the alternative with the highest construction emissions based on the length of transmission lines and number of access roads (pg. 4-9). The SDEIS also identifies Alternative B as the alternative that would cross over 29.6 acres of wetlands and have the greatest direct impacts, permanently affecting 3.4 acres of wetlands (pg. 4-114). By comparison, Alternatives A1, A2, A4 and A5 have considerably fewer impacts to the environment. Due to current losses of wetlands and poor air quality in the Sacramento Area, we recommend against Alternatives B and C.

A.2-1

*Recommendation:*

EPA recommends that the Western Area Power Administration (WAPA) select one of the aforementioned "A" Alternatives as the Preferred Alternative. If WAPA concludes that Alternative A3, B or C is the Preferred Alternative, we recommend that the SFEIS identify the Environmentally Preferred Alternative, as well as the basis for the selection of the Preferred Alternative.

A.2-2

**Water Resources**

The proposed project could adversely affect jurisdictional waters and wetlands by crossing sensitive watersheds, such as the Cosumnes River. While WAPA commits to coordination with the U.S. Army Corps of Engineers and Regional Water Quality Control Board, if construction would occur within jurisdictional waters or wetlands (pg. 3-30, Environmental Protection Measure #98), impacts from each of the Proposed Alternatives to aquatic resources and waters of the U.S. should be included in the SFEIS.

*Recommendations:*

- The SFEIS should include information on the impacts of each of the proposed alternatives to aquatic resources. While this information was included in the previous FEIS (Table 4-1, pg. 4-3 FEIS), it is not included in the current document. We recommend that this information be displayed in a comparative, tabular format. In addition to this table, the text of the SFEIS should also detail potential impacts to wetlands. For instance, describe the potential effects of culverts, access roads, and new ROWs.

A.2-3



**Comment Set A.2, cont.**  
**U.S. Environmental Protection Agency**

- We recommend that WAPA commit to conduct detailed wetland surveys and wetland delineations upon selection of the preferred alternative and include this information in the SFEIS.

A.2-4

**Biological Resources**

Vernal pool habitats are important in the Central valley of California because they sustain plants and animals that have adapted to survive specifically in these habitats (pg. 4-14 and 4-15). The list of Environmental Protection Measures for biological resources does not appear to include seasonal or limited operating periods or protective fencing as means to avoid and minimize adverse impacts to such sensitive biological resources (pg. 3-24).

A.2-5

*Recommendation:*

We recommend WAPA limit operating periods and fence sensitive resources such as vernal pools and to include these procedures in SFEIS Environmental Protection Measures.

**Air Quality**

The project is located in a nonattainment area for particulate matter less than 10 microns in diameter (PM<sub>10</sub>). Additionally, the SDEIS states that air monitoring data currently shows that the project area is consistently in violation of air quality standards (pg. 4-5). Major construction, earth clearing, grading and traffic will occur due to the proposed action (pg. 4-5).

A.2-6

On October 17, 2006, EPA issued a final rule establishing changes to the PM<sub>2.5</sub> and PM<sub>10</sub> National Ambient Air Quality Standard (NAAQS), which was effective on December 18, 2006 (See 71 FR 61144). In this final rule, a new 24-hour standard for PM<sub>2.5</sub> of 35 micrograms per cubic meter (35 µg/m<sup>3</sup>) replaces the old standard of 65 µg/m<sup>3</sup>, and the annual PM<sub>10</sub> standard of 50 µg/m<sup>3</sup> has been revoked. The PM<sub>10</sub> 24-hour standard of 150 µg/m<sup>3</sup> has been retained. Conformity for the new 24-hour PM<sub>2.5</sub> standard of 35 µg/m<sup>3</sup> does not apply until one year after the effective date of nonattainment designations. While this is not currently the case for the project area, EPA believes that it is appropriate for the FEIS to address the newly amended "fine" particulate matter standard (PM<sub>2.5</sub>).

*Recommendation:*

For disclosure purposes, we recommend the SFEIS include a discussion of the implications of the amended PM<sub>2.5</sub> standards with respect to the execution of this project. The SFEIS should make the appropriate changes concerning the NAAQS PM<sub>2.5</sub> regulation and its new 24 hour standard, which was lowered to 35 µg/m<sup>3</sup>. EPA recognizes the serious health effects that "fine" particulates can cause, and, therefore, urges project proponents to reduce particulate emissions to the greatest extent possible. This is primarily important where management actions could affect sensitive receptors such as children and the elderly.

### Comment Set A.3

## U.S. Fish & Wildlife Service/California Department of Fish and Game



US Fish & Wildlife Service  
Sacramento Fish and Wildlife Office  
2800 Cottage Way, Room W-2605  
Sacramento, CA 95825  
(916) 414-6600  
FAX (916) 414-6712



Department of Fish and Game  
Sacramento Valley-Central  
Sierra Region  
1701 Nimbus Road, Suite A  
Rancho Cordova, CA 95670  
FAX (916) 358-2912

U.S Fish and Wildlife Service File # 1-1-07-TA-1487

**AUG 27 2007**

Mr. Steve Tuggle  
Natural Resources Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, California 95630-4710

Subject: Comments on the Draft Supplemental Environmental Impact Statement and Environmental Impact Report (SEIS/EIR) for the Sacramento Area Voltage Support Project in Sutter, Sacramento, and Placer Counties, California

Dear Mr. Tuggle:

The Department of Fish and Game (DFG) and the U.S. Fish and Wildlife Service (Service) have reviewed the Supplemental Draft Environmental Impact Statement and Environmental Impact Report (SEIS/EIR) for the proposed Sacramento Voltage Support Project (the project). The Western Area Power Administration (WAPA), Sacramento Municipal Utility District (SMUD), and the City of Roseville coordinated to prepare this SEIS/EIR. The SEIS/EIR addresses the following activities: (1) construction of from 26.2 to 33.2 miles of double-circuit 230-kilovolt (kV) electrical transmission line from the existing O'Banion substation to the existing Elverta substation; and (2) rebuilding approximately 4.8 miles of double-circuit 115-kV and 230-kV transmission line from the Elverta substation to the existing Natomas substation. The project would require ground disturbance for the placement of 150 to 180 support structures (monopoles), right-of-way (ROW) ranging from 100 to 125 feet in width, and 42.5 to 55.6 acres of permanent and temporary access roads, depending on the alternative chosen.

As trustee for the State's fish and wildlife resources, the DFG has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of such species. In that capacity, the DFG administers the California Endangered Species Act (CESA), the Native Plant Protection Act (NPPA), and other provisions of the California Fish and Game Code that affords protection to the State's fish and wildlife trust resources. The DFG also considers issues as related to the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. 703-712) (MBTA). The Service is providing comments in accordance with the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq.*) (ESA), and the MBTA. In this letter, DFG and the Service are collectively referred to as the Agencies.

A.3-1

**Comment Set A.3, cont.****U.S. Fish & Wildlife Service/California Department of Fish and Game**

Mr. Steve Tuggle

2

The Project Scope of Work (ES.7 in the Executive Summary section) states that modifications will be made on the O'Banion, Elverta, and Natomas substations. However, the Agencies could find no further mention of these modifications in the remainder of the SEIS/EIR. We request that WAPA describe these modifications and their potential to impact sensitive resources in a revised EIS/EIR.

A.3-2

Direct Effects

The Agencies believe that each of the proposed alternatives are likely to affect the federally and state-listed as threatened giant garter snake (*Thamnophis gigas*), the state-listed as threatened Swainson's hawk (*Buteo swainsoni*), the federally-listed as threatened vernal pool fairy shrimp (*Branchinecta lynchi*), and the federally-listed as endangered vernal pool tadpole shrimp (*Lepidurus packardii*).

The Agencies require more information to determine if the project may affect the federally and state-listed as endangered Sacramento Orcutt grass (*Orcuttia viscida*), the federally-listed as threatened and state-listed as endangered slender Orcutt grass (*Orcuttia tenuis*), the federally-listed as threatened Colusa grass (*Neostapfia colusana*), and the federally and state-listed as endangered Solano grass (*Tuctoria mucronata*). These species are currently not known to occur within the project alternative alignments, but the Agencies believe potential habitat may be present in this area. Focused rare plant surveys are often the best way to determine if these species occur in the project area. The Agencies should be contacted prior to beginning surveys for the latest guidance on rare plant surveys.

A.3-3

Temporary and permanent ground disturbance from the clearing of ROW, placement of monopoles, and future maintenance of poles and access roads are all activities of concern to the Agencies. Excavation activities may result in increased erosion, leading to siltation of wetlands and other receiving water features, including drainage and irrigation canals (habitat for giant garter snake), and vernal pool features (habitat for vernal pool fairy shrimp, vernal pool tadpole shrimp, and vernal pool plants).

A.3-4

Vernal pool species are threatened primarily by loss and fragmentation of existing habitat. Vernal pool complexes, which are mosaics of wetted pools which are hydrologically connected and include the associated upland habitat and local watersheds essential for the function of the pools, must be preserved on a landscape level to ensure the persistence of the species that inhabit them. Although dispersal of vernal pool crustaceans between complexes is and probably always has been relatively low, fragmentation of existing intact complexes could contribute to the loss of genetic diversity of vernal pool species, and reduce the likelihood of recolonization from other populations. Fragmentation by conversion or degradation of habitat may essentially serve as a barrier to dispersal. It is essential that large, contiguous areas of uninterrupted vernal pool habitat, including both wetted and upland components, be preserved across the range of each of the listed species to "buffer" against unforeseen stochastic events.

**Comment Set A.3, cont.**  
**U.S. Fish & Wildlife Service/California Department of Fish and Game**

Mr. Steve Tuggle

3

Construction of access roads or monopoles may serve to fragment existing vernal pool complexes by introducing impermeable or hardpacked surface which may disrupt the hydrology and mechanisms by which vernal pool species disperse. Vernal swales, which are sometimes present in vernal pool complexes and serve to “connect” pools, could be truncated by access roads or monopoles.

A.3-4, cont.

The Service is concerned about direct effects to vernal pool fairy shrimp and vernal pool tadpole shrimp from the project. Specifically, the following statement in Section 4.2.2.3 should be reconsidered:

A.3-5

“Vernal pools have been known to recover within one to four seasons following disturbance, as long as the hardpan in the soil is not penetrated. Soil disturbance from temporary roads and pulling site would not be deep enough to damage the impermeable layer.”

The SEIS/EIR provides no information in support of this statement. Placement of monopoles could permanently impact the hydrological regime of a vernal pool complex, and the associated ground disturbance may result in colonization by non-native plants, animals, and insects. Non-native species may outcompete with crustaceans and plants in vernal pools, prey directly on native vernal pool species, and outcompete or prey on species which pollinate vernal pool plants. In addition, depending on the local soil and geological conditions, the hardpan may be as little as a few inches below the surface, making installation of large monopoles into the ground almost certain to “break” the hardpan. Maintaining the hardpan is necessary to ensure surface and subsurface water contributions to the vernal pool features remain intact; otherwise, the inundation period of features, which is critical for the vernal pool crustaceans to complete their life cycle, may be irreparably disrupted. The Service encourages WAPA to strive to place monopoles in areas outside and as far away as possible from existing vernal pool complexes to prevent this from occurring.

Table 4.2-1 provides a breakdown of acres of habitat which could be impacted by each of the proposed alternatives. However, no explanation was provided as to how these acreages were calculated. For example, the Service believes that species that inhabit all vernal pools within 250 feet of ground disturbing activities could be indirectly affected by ground disturbing activities, depending on local topography and hydrology. The SEIS/EIR did not discern between vernal pool acreages which would be directly impacted and indirectly impacted by the project. The Service considers if any part of a vernal pool is directly impacted, then the entire pool is impacted. The Agencies request the SEIS/EIR be amended to provide a more thorough explanation of how the fields in this table were calculated.

A.3-6

Indirect and Cumulative Effects

CEQA guidelines require a discussion of the ways in which a project could potentially foster economic or population growth or the construction of additional housing in the surrounding environment. The SEIS/EIR states that the proposed project would not remove obstacles to

A.3-7

**Comment Set A.3, cont.**  
**U.S. Fish & Wildlife Service/California Department of Fish and Game**

Mr. Steve Tuggle

4

growth, yet provides no meaningful discussion regarding the potential for the project to contribute to economic or population growth or the construction of additional housing in the surrounding environment. The Agencies recommend that the SEIS/EIR provide the above discussion by examining the relationship between energy supply and land use planning for this project, and demonstrate how growth inducing impacts to fish and wildlife resources will be avoided or reduced to a level below significance.

A.3-7, cont.

The 2A segments appear to encroach on existing preserves established as mitigation for the Natomas Basin Habitat Conservation Plan (NBHCP). The NBHCP was established to minimize and mitigate for the loss of habitat from urban development and operation and maintenance of irrigation and drainage systems in the Natomas Basin. The giant garter snake and Swainson's hawk are focal species of the NBHCP, and the preserves are managed primarily to benefit these species, secondarily providing enhanced habitat for the other 20 species. The Agencies are concerned that the placement of structures and transmission lines in or adjacent to existing preserves will negatively impact the ability of The Natomas Basin Conservancy (TNBC) (the NBHCP implementor) to adequately manage these preserves for the benefit of the covered species. TNBC is required to perform certain management activities, such as aerial spraying of rice fields that could be dangerous or impossible with the presence of high voltage transmission lines.

A.3-8

The Agencies believe that transmission lines in or adjacent to these preserves where Swainson's hawks are concentrated may result in mortality to Swainson's hawks or other raptor species by collision with the monopoles or lines themselves. Although not protected by the ESA, Swainson's hawks are covered under the MBTA, of which the Service has authority, and CESA, of which DFG has authority.

A.3-9

The MBTA implements four treaties that provide for international protection of migratory birds. The MBTA prohibits taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Department of the Interior. Bald and golden eagles are afforded additional legal protection under the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d). Unlike the ESA, neither the MBTA nor its implementing regulations at 50 CFR Part 21, provide for permitting of incidental take of migratory birds.

Table 3-3 does not address the potential for raptor collisions with monopoles or power lines. This table should be amended to include the potential for this to occur, and provide "Environmental Protection Measures" to address collisions. Various raptorial species, such as eagles, hawks, owls, etc., frequently use power lines and support structures for perching and nesting. Standard techniques have been developed to prevent raptor electrocutions at electric distribution lines. The latest guidance is included in the publication, *Suggested Practices for Raptor Protection on Power Lines - The State of the Art in 2006*. Avian Power Line Interaction Committee, Edison Electric Institute/Raptor Research Foundation. Washington, D.C. (ordering information can be found at <http://www.aplic.org>). In conjunction with this guidance, the Agencies recommend that the April 2005, *Avian Protection Plan (APP) Guidelines, A Joint*

A.3-10

**Comment Set A.3, cont.**  
**U.S. Fish & Wildlife Service/California Department of Fish and Game**

Mr. Steve Tuggle

5

*Document Prepared by the Edison Electric Institute's Avian Power Line Interaction Committee and the U.S. Fish and Wildlife Service* ([http://www.eei.org/industry\\_issues/environment/land/wildlife\\_and\\_endangered\\_species/AvianProtectionPlanGuidelines.pdf](http://www.eei.org/industry_issues/environment/land/wildlife_and_endangered_species/AvianProtectionPlanGuidelines.pdf)) be used. The Agencies recommend that WAPA consider requiring power distributors to use these guidelines in designing the primary distribution lines to further reduce the likelihood of collision mortalities, as avian mortalities are more likely to occur on primary distribution lines than larger transmission lines.

A.3-10, cont.

The SEIS/EIR states in item 54 on page 4-22 that an on-site qualified raptor biologist would be assigned to the project if construction activities would cause nest abandonment or force out fledglings within 0.25 miles of the project area. In order to lower the project's impact on the Swainson's hawk below a level that is significant, the Agencies recommend that item 54 of the SEIS/EIR be revised to state that if nesting Swainson's hawks are identified during surveys and project related activities are expected to occur within 0.5 miles of an active nest, the project proponent will consult with the DFG, and if necessary, obtain an incidental take permit issued pursuant to Fish and Game Code section 2081. The SEIS/EIR does not provide a discussion of loss of foraging habitat for Swainson's hawks. The Agencies also recommend that the SEIS/EIR be revised to include a discussion of the potential loss of this foraging habitat, and provide adequate mitigation measures to lower the project's impact on Swainson's hawk to below a level that is significant.

A.3-11

A.3-12

Based upon the discussion in section 4.2.2.2 of the SEIS/EIR for giant garter snake, the potential for take of this species exists as a result of project related activities. Therefore, the Agencies recommend that the SEIS/EIR be revised to state that in addition to consulting with the Service under the authority of the ESA, as amended, the project proponent will consult with the DFG, and if necessary, obtain an incidental take permit issued pursuant to Fish and Game Code section 2081. The SEIS/EIR provides a discussion of loss of habitat for giant garter snake, but does not provide adequate measures to lower the project's impact on giant garter snake to below a level that is significant. The Agencies also recommend that the SEIS/EIR be revised to include a discussion of the potential loss of both aquatic and upland habitat, and provide adequate mitigation measures to lower the project's impact on giant garter snake to below a level that is significant.

A.3-13

A.3-14

The northern harrier (*Circus cyaneus*; NOHA) is listed in California as a Species of Special Concern, and is protected from take by Fish and Game Code section 3503.5. The SEIS/EIR does not provide a discussion of potential impacts to these ground nesting raptors, and does not consider avoidance or mitigation measures to avoid "take" or lessen potential impacts to below a level that is significant. The Agencies recommend that the SEIS/EIR provide a discussion of the project's potential to impact NOHA, and include measure to avoid take of these birds, and their nests and eggs.

A.3-15

The SEIS/EIR fails to adequately analyze how the project may affect implementation of the NBHCP. Successful implementation of the NBHCP is premised on all the area in the Natomas Basin outside of the permit areas remaining undeveloped for the benefit of the covered species.

A.3-16

**Comment Set A.3, cont.**  
**U.S. Fish & Wildlife Service/California Department of Fish and Game**

Mr. Steve Tuggle

6

The DFG and the Service consider all land in the Natomas Basin as habitat for one or more of the covered species. WAPA should consider what the effect of the loss of this habitat cumulatively with other projects in the unpermitted area will effect implementation of the NBHCP. Because of the potential for conflict with the NBHCP, the Agencies do not recommend selection of any of the section 2A segments.

A.3-16, cont.

The proposed Placer County Conservation Plan (PCCP) is currently being developed. It is designed to address the increasing demand for urban development in western Placer County, while establishing a conservation strategy designed to avoid, minimize, and compensate for the loss or modification of wetlands, waters, and species habitat. Although the PCCP is not yet approved, the Agencies encourage WAPA to coordinate with Placer County, the City of Lincoln, and the other PCCP proponents to design their project which would avoid selecting an alternative which would preclude the success of a future PCCP. The SEIS/EIR should be amended to address how Alternative C may conflict with a future PCCP conservation strategy.

A.3-17

The SEIS/EIR should consider and analyze whether implementation of the proposed project will result in reasonably foreseeable potentially significant impacts subject to regulation by the DFG under section 1600 et seq. of the Fish and Game Code. In general, such impacts result whenever a proposed project involves work undertaken in or near a river, stream, or lake that flows at least intermittently through a bed or channel, including ephemeral streams and water courses. Impacts triggering regulation by the DFG under these provisions of the Fish and Game Code typically result from activities that:

A.3-18

- Divert, obstruct, or change the natural flow or the bed, channel, or bank of any river, stream, or lake;
- Use material from a streambed; or
- Result in the disposal or deposition of debris, waste, or other material where it may pass into any river, stream, or lake.

In the event implementation of the proposed project involves such activities, and those activities will result in reasonably foreseeable substantial adverse effects on fish or wildlife, a Lake or Streambed Alteration Agreement (LSAA) will be required by the DFG. Because issuance of a LSAA is subject to review under the California Environmental Quality Act (CEQA), the SEIS/EIR should analyze whether the potentially feasible mitigation measures set forth below will avoid or substantially reduce impacts requiring a LSAA from the DFG.

This project will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency.

A.3-19

**Comment Set A.3, cont.**  
**U.S. Fish & Wildlife Service/California Department of Fish and Game**

Mr. Steve Tuggle

7

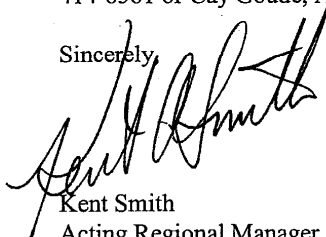
Conclusion

The Agencies believe Alternative B is the superior alternative because it appears to be the least detrimental to covered species and their habitats. However, this determination was made on incomplete information, as outlined in this letter. The SEIS/EIR should be revised and recirculated to include additional information on the concerns. We encourage WAPA to coordinate with the Agencies early in the planning stages to design a project that minimizes and avoids sensitive resources as much as possible.

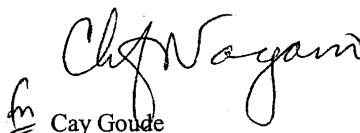
A.3-20

Thank you for the opportunity to review this project. If we can be of further assistance, at DFG please contact Mr. Todd Gardner at (209) 745-1968, or Mr. Jeff Drongesen at (916) 358-2919; and at the Service please contact Jana Milliken, Acting Sacramento Valley Branch Chief, at (916) 414-6561 or Cay Goude, Assistant Field Supervisor, at (916) 414-6600.

Sincerely,



Kent Smith  
Acting Regional Manager  
California Department of Fish and Game



Cay Goude  
Assistant Field Supervisor  
U. S. Fish and Wildlife Service

cc: Mr. Kent Smith  
Mr. Todd Gardner  
Department of Fish and Game  
Sacramento Valley-Central Sierra Region  
1701 Nimbus Road, Suite A  
Rancho Cordova, California 95670

Mr. Ken Sanchez  
Ms. Jana Milliken  
U.S. Fish and Wildlife Service  
2800 Cottage Way, Room W-2605  
Sacramento, California 95825-1846

Ms. Anna Sutton  
Ms. Andrea Jones  
U.S. Army Corps of Engineers  
Regulatory Branch  
1325 J Street, Room 1480  
Sacramento, California 95814-2922



**Comment Set A.3, cont.**  
**U.S. Fish & Wildlife Service/California Department of Fish and Game**

Mr. Steve Tuggle

8

Ms. Nancy Levin  
Ms. Erin Foresman  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street, CED-2  
San Francisco, California 94105-3901

Mr. John Roberts  
The Natomas Basin Conservancy  
2150 River Plaza Dr., Suite 460  
Sacramento, California 95833

Mr. Scot Mende  
City of Sacramento Planning Department  
915 I Street, 3<sup>rd</sup> Floor  
Sacramento, California 95814

State of California  
Office of Planning and Research  
P.O. Box 3044  
Sacramento, CA 95812-3044

## Comment Set A.4 California Department of Fish and Game



State of California - THE RESOURCES AGENCY  
**DEPARTMENT OF FISH AND GAME**  
<http://www.dfg.ca.gov>  
North Central Region  
1701 Nimbus Road, Suite A  
Rancho Cordova, CA 95670  
(916) 358-2900



August 28, 2007

Mr. Steve Tuggie  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

Dear Mr. Tuggie:

The Department of Fish and Game (DFG) has reviewed the draft Supplemental Environmental Impact Report (DSEIR) for the proposed Sacramento Area Voltage Support project (SCH#2006052119). The project consists of a plan to construct and operate 31 to 38 miles of new 230-kilovolt transmission line between O'Banion and Elverta, and to reconstruct 230-kilovolt transmission lines between Elverta and Natomas. The project is located in Sutter, Placer, and Sacramento counties.

Wildlife habitat resources along the project alignments include a variety of habitats ranging from natural areas to open farm fields. Significant natural resources include habitat for sensitive species, as well as, numerous streams, riparian corridors, and seasonal and perennial wetlands.

We find that the DSEIR fails to describe wildlife resources within the various project alignments, and similarly fails to address the project's impacts to wildlife. In our 2002 review of Western Area Power Administration's Voltage Support project, (O'Banion to Tracy) DFG raised concerns that we feel are relevant to the current proposal, namely:

A.4-1

1. Collisions (Bird strikes):

The project is located in an area of California's central valley that is important for migrant birds. Collision with electric transmission lines is an important source of mortality for migrant birds. Ducks, geese, sandhill cranes, shorebirds, raptors, and passerines move through, or spend the winter in habitats traversed by the proposed project. During the winter months fog obscures visibility in the central valley, thereby increasing the likelihood of bird collisions with electric transmission lines. Despite our previous attempts to raise the issue of bird collisions with the Western Area Power Administration, the DSEIR still fails to discuss this significant impact.

A.4-2

A.4-3

*Conserving California's Wildlife Since 1870*

**Comment Set A.4, cont.**  
**California Department of Fish and Game**

Mr. Tuggie  
 August 28, 2007  
 Page Two

We recommend that the DSEIR be revised to include a discussion of the project's affect on migrant birds. In particular, the DSEIR should assess the location of the various proposed alignment and their relative proximity to areas that are important winter habitat, concentration areas, roosts, etc. for waterfowl or other migratory species. The DSEIR should also contain an assessment of each alignment's potential for adverse impacts. We recommend that the project be designed so that it minimizes bird strikes. If the construction of the project will result in unavoidable bird mortalities, then the SDEIR should provide mitigation that reduces these impacts below a level that is significant.

A.4-4

A.4-5

2. Habitat Loss:

Almost all of the segments of the project traverse areas that are farmed in crops that are currently available as seasonally flooded agricultural habitat for a variety of migrant waterfowl (Sutter ByPass, area south of the Cross Canal, etc.) In addition to creating a collision hazard for migrant birds, construction of new transmission line will affect the habitat quality of the lands along the Right-of-Way (ROW). Waterfowl habitat use underneath newly constructed electrical transmission lines will decline significantly from its preconstruction value because of waterfowl's avoidance of electric transmission lines.

A.4-6

We recommend that the DSEIR be revised to address of the loss of habitat resulting from construction of new transmission lines. The EIS should provide mitigation that reduces these impacts to a level that is less than significant.

3. Nesting Birds:

Depending on the time of year when construction and maintenance is undertaken, modification of habitat along the ROW has the potential to impact nesting birds. Construction of new facilities, reconstruction of existing facilities, or the routine maintenance of the facility may result in the destruction of active bird nest, or cause their abandonment. We are particularly concerned with the project's potential for adverse impacts to nesting Swainson's hawks (*Buteo swainsonii*). The DSEIR fails to adequately address the potential for take of the State-listed threatened Swainson's hawk.

A.4-7

We recommend that the DSEIR be revised to include a requirement that pre-construction surveys designed to disclose the presence of nesting Swainson's hawk be conducted. If Swainson's hawks are discovered, then the applicant should be required to consult with DFG regarding the means of avoiding impacts to nesting Swainson's hawks.

**Comment Set A.4, cont.**  
**California Department of Fish and Game**

Mr. Tuggie  
August 28, 2007  
Page Three

4. Dual-listed Species:

The project has the potential to affect species that are listed under both the State and Federal Endangered Species Acts. Examples include the giant garter snake (*Thamnophis gigas*), and Chinook salmon (*Onchorhynchus tshawytscha*). The applicant should coordinate consultation with the U. S. Fish and Wildlife Service (FWS) and DFG when obtaining a federal Biological Opinion. The DFG will not issue a Consistency Determination for dual listed-species without proper notification.

A.4-8

The SDEIR should be revised to include a provision for coordinated FWS-DFG consultation regarding dual-listed species.

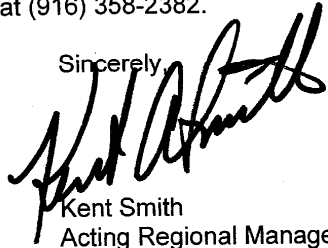
This project will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency.

A.4-9

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notifications should be directed to this office.

Thank you for the opportunity to review this project. If the DFG can be of further assistance, please contact Mr. Dan Gifford, Staff Environmental Scientist, at (209) 369-8851 or, Mr. Kent Smith, at (916) 358-2382.

Sincerely,



Kent Smith  
Acting Regional Manager

cc: Mr. Dan Gifford  
Department of Fish and Game  
1701 Nimbus Road, Suite A  
Rancho Cordova, CA 95670

Ms. Holly Herod  
U.S. Fish and Wildlife Service  
2800 Cottage Way, Room W2605

**Comment Set A.5**  
**California Department of Transportation**

(2/26/2008) SVS-SEIS - Sacramento Voltage Support Project Draft EIS/EIR Comments

Page

**From:** <brian\_goldman@dot.ca.gov>  
**To:** <svs-seis@wapa.gov>  
**Date:** 8/22/2007 1:25 PM  
**Subject:** Sacramento Voltage Support Project Draft EIS/EIR Comments

Comments on the Sacramento Area Voltage Support Draft SEIS/EIR

To whom it may concern,

I work for the Department of Transportation and am commenting on behalf of the Utility Branch. I wanted to send you my comments on the WAPA IGR report for Sutter County (07SUT0027). My supervisor and I discussed this and we feel that the only comments that should be documented on our behalf are as follows:

- 1) SMUD should consider the future growth of Highway 99 in their plans.
- 2) SMUD should also take into consideration the two interchange projects along Highway 99. Riego Road Interchange (EA: 40660) and Elverta Road Interchange (EA: 37150).
- 3) SMUD should follow all Caltrans requirements for overhead utilities when designing the alignment of the power lines.

A.5-1

A.5-2

A.5-3

Contact me if you have any questions about my comments.

Thank you,

Brian Goldman  
 Utility Coordinator  
 Right of Way, Marysville  
 Department of Transportation  
 530-741-7145

Contact Information

Subscription: Send me newsletters by post.  
 Name: Brian Goldman  
 Organization: State of California, Caltrans  
 Daytime Phone: 530-741-71  
 Email: brian\_goldman@dot.ca.gov  
 Mailing Address:  
 720 Yuba Street, PO Box 911  
 Marysville, CA 95901

**Comment Set A.6**  
**Department of Transportation**

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 3  
703 B STREET  
P. O. BOX 911  
MARYSVILLE, CA 95901-0911  
PHONE (530) 741-5151  
FAX (530) 741-5346  
TTY (530) 741-4509



*Flex your power!  
Be energy efficient!*

August 28, 2007

07SUT0027  
03-SUT-099, P.M.: 0.95  
Western Area Power Administration  
SEIS

Steve Tuggle, Natural Resources Manager  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

Dear Mr. Tuggle:

Thank you for the opportunity to review and provide comments on the Draft Supplemental Environmental Impact Statement (SEIS) for the reconstruction of existing 230-kV/115-kV transmission lines between SMUD's Elverta and Natomas substations. Our comments are as follows:

- SMUD should take into consideration future development along the State Route 99 (SR-99) corridor. Planned growth in the area west of SR-99/Riego Road (EA: 40660) and south of SR-99/Elverta Road (EA: 37150) are requiring intersection improvements.
- SMUD should provide for all Caltrans requirements for overhead utilities, when designing the alignment of the power lines.

A.6-1

A.6-2

Please send a copy of the conditions of the project approval, when available. If you have any questions contact Randy Evans, Local Development/Intergovernmental Review Coordinator, at (530) 634-7616 or email: randy\_evans@dot.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Sukhvinder Takhar".

Sukhvinder (Sue) Takhar, INTERIM CHIEF  
Office of Transportation Planning-North

*"Caltrans improves mobility across California"*

**Comment Set A.7**  
**Department of Water Resources**

STATE OF CALIFORNIA - THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

**DEPARTMENT OF WATER RESOURCES**

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 942360001  
(916) 653-5791



July 24, 2007

Ronald Scott  
Sacramento Municipal Utility District  
Post Office Box 15830 MS B203  
Sacramento, California 95852-1830

**RECEIVED**  
AUG 08 2007  
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8/27/07  
e

Sacramento Area Voltage Support Draft Supplemental Environmental Impact Statement and Environmental Impact Report  
State Clearinghouse (SCH) Number: 2006052119

The project corresponding to the subject SCH identification number has come to our attention. The limited project description suggests your project may be an encroachment on the State Adopted Plan of Flood Control. You may refer to the California Code of Regulations, Title 23 and Designated Floodway maps at <http://recbd.ca.gov/>. Please be advised that your county office also has copies of the Board's designated floodways for your review. If indeed your project encroaches on an adopted food control plan, you will need to obtain an encroachment permit from the Reclamation Board prior to initiating any activities. The attached Fact Sheet explains the permitting process. Please note that the permitting process may take as much as 45 to 60 days to process. Also note that a condition of the permit requires the securing all of the appropriate additional permits before initiating work. This information is provided so that you may plan accordingly.

A.7-1

If after careful evaluation, it is your assessment that your project is not within the authority of the Reclamation Board, you may disregard this notice. For further information, please contact me at (916) 574-1249.

Sincerely,

Christopher Huitt  
Staff Environmental Scientist  
Floodway Protection Section

cc: Governor's Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street, Room 121  
Sacramento, CA 95814

**Comment Set A.7, cont.**  
**Department of Water Resources**

**Encroachment Permits Fact Sheet**

**Basis for Authority**

State law (Water Code Sections 8534, 8608, 8609, and 8710 – 8723) tasks the Reclamation Board with enforcing appropriate standards for the construction, maintenance, and protection of adopted flood control plans. Regulations implementing these directives are found in California Code of Regulations (CCR) Title 23, Division 1.

**Area of Reclamation Board Jurisdiction**

The adopted plan of flood control under the jurisdiction and authority of the Reclamation Board includes the Sacramento and San Joaquin Rivers and their tributaries and distributaries and the designated floodways.

Streams regulated by the Reclamation Board can be found in Title 23 Section 112. Information on designated floodways can be found on the Reclamation Board's website at [http://recbd.ca.gov/designated\\_floodway/](http://recbd.ca.gov/designated_floodway/) and CCR Title 23 Sections 101 - 107.

**Regulatory Process**

The Reclamation Board ensures the integrity of the flood control system through a permit process (Water Code Section 8710). A permit must be obtained prior to initiating any activity, including excavation and construction, removal or planting of landscaping within floodways, levees, and 10 feet landward of the landside levee toes. Additionally, activities located outside of the adopted plan of flood control but which may foreseeable interfere with the functioning or operation of the plan of flood control is also subject to a permit of the Reclamation Board.

Details regarding the permitting process and the regulations can be found on the Reclamation Board's website at <http://recbd.ca.gov/> under "Frequently Asked Questions" and "Regulations," respectively. The application form and the accompanying environmental questionnaire can be found on the Reclamation Board's website at <http://recbd.ca.gov/forms.cfm>.

**Application Review Process**

Applications when deemed complete will undergo technical and environmental review by Reclamation Board and/or Department of Water Resources staff.

Technical Review

A technical review is conducted of the application to ensure consistency with the regulatory standards designed to ensure the function and structural integrity of the adopted plan of flood control for the protection of public welfare and safety. Standards and permitted uses of designated floodways are found in CCR Title 23 Sections 107 and Article 8 (Sections 111 to 137). The permit contains 12 standard conditions and additional special conditions may be placed on the permit as the situation warrants. Special conditions, for example, may include mitigation for the hydraulic impacts of the project by reducing or eliminating the additional flood risk to third parties that may caused by the project.

Additional information may be requested in support of the technical review of



**Comment Set A.7, cont.**  
**Department of Water Resources**

your application pursuant to CCR Title 23 Section 8(b)(4). This information may include but not limited to geotechnical exploration, soil testing, hydraulic or sediment transport studies, and other analyses may be required at any time prior to a determination on the application.

Environmental Review

A determination on an encroachment application is a discretionary action by the Reclamation Board and its staff and subject to the provisions of the California Environmental Quality Act (CEQA) (Public Resources Code 21000 et seq.). Additional environmental considerations are placed on the issuance of the encroachment permit by Water Code Section 8608 and the corresponding implementing regulations (California Code of Regulations – CCR Title 23 Sections 10 and 16).

In most cases, the Reclamation Board will be assuming the role of a “responsible agency” within the meaning of CEQA. In these situations, the application must include a certified CEQA document by the “lead agency” [CCR Title 23 Section 8(b)(2)]. We emphasize that such a document must include within its project description and environmental assessment of the activities for which are being considered under the permit.

Encroachment applications will also undergo a review by an interagency Environmental Review Committee (ERC) pursuant to CCR Title 23 Section 10. Review of your application will be facilitated by providing as much additional environmental information as pertinent and available to the applicant at the time of submission of the encroachment application.

These additional documentations may include the following documentation:

- California Department of Fish and Game Streambed Alteration Notification (<http://www.dfg.ca.gov/1600/>),
- Clean Water Act Section 404 applications, and Rivers and Harbors Section 10 application (US Army Corp of Engineers),
- Clean Water Act Section 401 Water Quality Certification, and
- corresponding determinations by the respective regulatory agencies to the aforementioned applications, including Biological Opinions, if available at the time of submission of your application.

The submission of this information, if pertinent to your application, will expedite review and prevent overlapping requirements. This information should be made available as a supplement to your application as it becomes available. Transmittal information should reference the application number provided by the Reclamation Board.

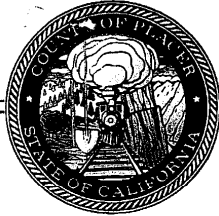
In some limited situations, such as for minor projects, there may be no other agency with approval authority over the project, other than the encroachment permit by Reclamation Board. In these limited instances, the Reclamation Board

**Comment Set A.7, cont.**  
**Department of Water Resources**

may choose to serve as the "lead agency" within the meaning of CEQA and in most cases the projects are of such a nature that a categorical or statutory exemption will apply. The Reclamation Board cannot invest staff resources to prepare complex environmental documentation.

Additional information may be requested in support of the environmental review of your application pursuant to CCR Title 23 Section 8(b)(4). This information may include biological surveys or other environmental surveys and may be required at anytime prior to a determination on the application.

**Comment Set A.8  
County of Placer**



**COUNTY OF PLACER  
Community Development Resource Agency**

John Marin, Agency Director

**PLANNING**

Michael J. Johnson, AICP  
Director of Planning

SENT VIA E-MAIL / ORIGINAL SENT VIA UNITED STATES POSTAL SERVICE

August 27, 2007

Steve Tuggle  
Natural Resources Manager  
Western Area Power Administration  
114 Parkshore Drive  
Folsom, CA 95630-4710

**SUBJECT: Comments on the Sacramento Area Voltage Support Draft Supplemental EIR/EIS**

Dear Mr. Tuggle:

Thank you for providing Placer County the opportunity to review the Draft Supplemental EIR/EIS for the Sacramento Area Voltage Support project. As you are aware, many of the proposed improvements associated with this project are located in the southwestern section of Placer County, and Placer County remains concerned with the impacts some of the proposed segment alignments may have on the implementation of the County's General Plan for this area of the County. Based upon its review of the Draft Supplemental EIR/EIS, Placer County provides the following comments for your consideration:

Proposed Segment 2C2: As shown in the EIR/EIS, the north/south transect of proposed line Segment 2C2 bifurcates the County's Future Study Area, and the east/west transect bifurcates the Regional University project site, for which the County is currently processing a development application. As identified in the County's General Plan, and consistent with the Sacramento Area Council of Governments "Blueprint" project, the most appropriate location for the County's (and the region's) future growth is this portion of Placer County. Accordingly, placing high-power transmission lines through this area is inconsistent with the County's, and the region's, possible long-term plans for this area. Additionally, placement of high-power transmission lines in this area is inconsistent with the Regional University project that is currently proposed for this area, as the placement of high-power transmission lines in this area would be in proximity to proposed residential and school/university land uses.

A.8-1

A.8-2

3091 County Center Drive / Suite 140 / Auburn, California 95603 / (530) 745-3000 / Fax (530) 745-3080  
Internet Address: <http://www.placer.ca.gov/planning> / email: [planning@placer.ca.gov](mailto:planning@placer.ca.gov)

**Comment Set A.8, cont.**  
**County of Placer**

Steve Tuggle  
August 27, 2007  
Page 2

As you are well aware, some research has found that exposure to elevated levels of extremely low frequency (ELF) magnetic fields such as those originating from electric power transmission lines may be implicated in a number of adverse health effects. These adverse health effects may include, but are not limited to, childhood Leukemia, adult Leukemia, breast cancer, neurodegenerative diseases (such as amyotrophic lateral sclerosis), miscarriage and clinical depression. Accordingly, the County cannot support any of the project proposals or alternatives that include Segment 2C2, as this section of line bifurcates a current development proposal being considered by the County, as well as the area considered by the County for possible future growth. Additionally, Segment 2C2 is directly adjacent to proposed residential and school developments within the City of Roseville, and the proposed impacts to existing and proposed projects within the City of Roseville would be similar to those impacts described above.

A.8-3


Alternatively, as the County realizes the importance of the proposed project, the County can support any of the alternative Segments (i.e., Segment 1, Segment 2A, Segment 2B, Segment 2C1, Segment 3), which still allow the placement of electric power transmission lines within the project area without bifurcating and impacting existing and proposed regional development areas.

A.8-4

With regard to the proposed project alternatives, the County cannot support Alternative C, as this alternative includes Segment 2C2. As noted above, the County cannot support any project proposal or alternative that includes Segment 2C2.

Thank you for providing the opportunity to review and comment on this Draft Supplemental EIR/EIS. Please be sure to include me in any future correspondences regarding this proposed project. Should you have any questions regarding the information contained in this letter, please call me at (530) 745-3000.

Sincerely,

  
MICHAEL J. JOHNSON, AICP  
Director of Planning

cc: Tom Miller, County Executive Officer  
Tony LaBouff, County Counsel  
Scott Finley, Deputy County Counsel  
Rob Sandman, Deputy County Counsel  
Rocky Rockholm, Supervisor for District 1  
Robert Weygandt, Supervisor for District 2  
Linda Brown, Aide to Supervisor Rockholm  
Jennifer Perriera, Aide to Supervisor Weygandt  
John Marin, CDRA Director

**Comment Set A.9**  
**Sacramento Metropolitan Air Quality Management District**



Larry Greene  
AIR POLLUTION CONTROL OFFICER

27 August 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
114 Parkshore Drive  
Folsom CA 95630

**RE: SACRAMENTO AREA VOLTAGE SUPPORT DRAFT SUPPLEMENTAL EIS/EIR**

Dear Mr. Tuggle:

Thank you for the opportunity to comment on the above referenced project. As described in the SEIS/EIR, a portion of the proposed project is located within the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). The following comments are based on CEQA guidance administered specifically by SMAQMD, and other air districts may submit additional comments based on their guidance.

Tables 4.1-6 and 4.1-7 identify construction related NOx emissions that exceed the SMAQMD adopted CEQA threshold of significance. The mitigation proposed as "environmental protection measures" in section 4.1.2.2 appropriately includes measures that are consistent with SMAQMD guidance for significant construction impacts, including EPM #14 which reduces NOx emissions from construction equipment by 20 percent. However, based on emissions summarized in Table 4.1-7, construction related NOx emissions after implementing mitigation remain significant during months 2, 3 and 4.

To reduce NOx emissions to a less than significant level, SMAQMD recommends payment of an off-site mitigation fee. Funds received by SMAQMD are used to implement projects that reduce NOx emissions elsewhere within the Sacramento Federal Ozone Nonattainment Area. The off-site mitigation fee program has been in place since October 2005. The table below provides an example calculation of the mitigation fee necessary to reduce significant NOx emissions based on the data from Table 4.1-7. This example assumes that the maximum allowable emissions that would be less than significant is 1,870 pounds of NOx per month (85 lbs/day significance level x 22 construction days/month = 1,870 lbs NOx).

A.9-1

777 12th Street, 3rd Floor ■ Sacramento, CA 95814-1908  
916/874-4800 ■ 916/874-4899 fax  
www.airquality.org

**Comment Set A.9, cont.  
Sacramento Metropolitan Air Quality Management District**

A.9-1, cont.

<b>Off-Site Mitigation Fee Calculation</b>			
Construction Phase	Total NOx (from Table 4.1-7) in lbs	Maximum NOx considered less than significant	Significant NOx (lbs) <small>(total minus maximum)</small>
Month 1	296	1870	0
Month 2	2661	1870	791
Month 3	2957	1870	1087
Month 4	2767	1870	887
Month 5	1626	1870	0
Month 6	1003	1870	0
O'Benion Substation	524	1870/mo	0
Elverta/Natomas Substation	327	1870/mo	0
<b>TOTAL SIGNIFICANT NOx (lbs)</b>			<b>2765</b>
<b>TOTAL SIGNIFICANT NOx (tons)</b>			<b>1.38</b>
<b>MITIGATION FEE (\$14,300 per ton)</b>			<b>\$19,770</b>
<b>ADMINISTRATIVE COST-RECOVERY (5%)</b>			<b>\$988</b>
<b>TOTAL FEE</b>			<b>\$20,758</b>

The total fee necessary to reduce significant NOx impacts during construction is \$20,758. The fee, including a requirement that the fee must be paid prior to commencement of construction activities, should be included as an additional mitigation measure in the Final SEIS/EIR.

If you have any questions regarding these comments, please contact me at 916.874.4886.

Sincerely



Peter Christensen  
Strategic Planning Division

SAC200600951

**Comment Set A.10  
Sacramento Regional County Sanitation District**



**10545 Armstrong Avenue  
Mather, CA 95655**  
**tele: [916] 876-6000**  
**fax: [916] 876-6160**  
**Website: www.srscsd.com**

August 30, 2007

Mr. Steve Tuggle  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630

**Board of Directors**  
Representing:

- County of Sacramento
- County of Yolo
- City of Citrus Heights
- City of Elk Grove
- City of Folsom
- City of Rancho Cordova
- City of Sacramento
- City of West Sacramento

Dear Mr. Tuggle

**Subject: Comments to the Draft Supplemental Environmental Impact Statement (EIS) and Environmental Impact Report (EIR)**

Sacramento Regional County Sanitation District (SRCS D) has reviewed the subject document and has the following comments:

The Upper Northwest Interceptor (UNWI) is being constructed in close proximity to the proposed project. All design and construction activities shall be coordinated with SRCS D to ensure that minimal conflicts occur.

If you have any questions regarding these comments you may contact me at (916) 876-6130 [arshadh@saccounty.net](mailto:arshadh@saccounty.net).

Mary K. Snyder  
District Engineer  
Stan R. Dean  
Plant Manager  
Wendell H. Kido  
District Manager  
Marcia Maurer  
Chief Financial Officer

Sincerely yours,

Humera Arshad  
Assistant Engineer  
Sacramento Regional County Sanitation District

HA:ha (ha)

cc: SRCS D Development Services (55-101)  
CSD-1 Development Services (55-101)  
Rigoberto Guizar (128-102)  
John Wong (128-102)  
Dajuana Gaines (99-003)

Technology in balance with

A.10-1

Sacramento Regional County Sanitation District

**Comment Set A.11**  
**City of Roseville**



**Community Development**

311 Vernon Street  
Roseville, California 95678-2649  
August 27, 2007

Mr. Steve Tuggle, Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**Subject: Comments on the Sacramento Area Voltage Support Project (SAVSP) Draft Supplemental Environmental Impact Statement and Environmental Impact Report (EIS/EIR)**

Dear Mr. Tuggle:

Thank you for the opportunity to review and provide comment on the draft EIS/EIR for the SAVSP. The City of Roseville understands the need for this project and supports the efforts of the Western Area Power Administration (WAPA) and the Sacramento Municipal Utility District (SMUD) to upgrade and increase the reliability of the regional electric distribution system. However, the City of Roseville strongly opposes the Alternative 2C2 alignment due to conflicts with the City's ongoing planning efforts and General Plan policy as described below.

**Land Use Impacts**

The Roseville City Council directed City staff to process two proposed specific plans: the Sierra Vista Specific Plan (SVSP); and, Creek View Specific Plan (CSP). Both plan areas are proposed for annexation to the City of Roseville and are nearly entirely located within the City's adopted sphere of influence. It should be noted that both plans are also located within development areas recommended under the "Blueprint" plan approved by the Sacramento Area Council of Government (SACOG). Proposed Alternative 2C2 would pose significant constraints the City's ongoing efforts to complete these specific plans as described below.

*Sierra Vista Specific Plan*

The SVSP encompasses approximately 2,000 acres and could ultimately include approximately 11,000 residential dwelling units, commercial, open space, parks, and schools. The City is in the process of finalizing a land use plan for this project and will soon release a Notice of Preparation for a draft Environmental Impact Report.

The SVSP planning area is identified in Figure 4.9-3 of draft EIS/EIR. However the planning area actually extends an additional 250 feet west of the western boundary shown in Figure 4.9-3. As such, Alternative 2C2 would actually pass through the SVSP planning area rather than adjacent to it as shown in Figure 4.9-3. As part of the specific plan, Watt Avenue, a six-lane arterial with right-of-way to accommodate bus rapid transit, would extend north of Baseline Road through the plan area and potentially within the right-of-way needed to accommodate Alternative 2C2. While the precise future alignment of Watt Avenue has not been determined, it is ultimately envisioned to connect north of the plan area with the proposed Placer County Regional University project and to the proposed Placer Parkway, both important regional transportation facilities. The Alternative 2C2 alignment makes the City's planning efforts more difficult by imposing constraints for sensitive land uses related to power line setback requirements and reducing available developable land. It also complicates planning efforts related to important regional transportation facilities.

A.11-1



## Comment Set A.11, cont.

### City of Roseville

Mr. Steve Tuggle, Natural Resource Manager  
SAVSP EIR/EIS Comments

August 27, 2007  
Page 2 of 3

It should also be noted that an existing Western & SMUD power line corridor is already located in the SVSP, and transects the plan area with an east-west alignment. This feature divides the specific plan in two. Given the size of the towers and the extent of the easement, this is a difficult existing feature to plan around. The proposed Alternative 2C2 north-south alignment would again divide the SVSP area, creating a disproportionate impact to the Sierra Vista Landowner Group and the proposed specific plan.

A.11-1, cont.

#### *Creekview Specific Plan*

The CSP is located northeast of Alternative 2C2. The City is simultaneously processing a land use plan for this project which is also located within the City's Sphere of Influence and includes a 570-acre planning area. The CSP is expected to accommodate approximately 3,000 residential units, a mixed use commercial area, elementary school, parks and open space.

While the CSP is more removed from the Alternative 2C2 alignment compared to the SVSP, the City of Roseville also owns the adjoining 1,700 acre Reason Farms property. Land use planning for CSP and southern pan handle of the Reason Farms property (located immediately adjacent to and west of the CSP) is being approached comprehensively by the City. It is expected that the Reason Farms panhandle will accommodate similar densities and land use patterns to that proposed within the CSP. The panhandle site is also being considered for a university use. While Alternative 2C2 would not cross this planning area, it would be immediately adjacent to the southwest corner of the City's panhandle property and therefore would impact westerly views from the plan area as well as impose constraints for sensitive land uses related to power line setback requirements potentially reducing available developable land.

#### **General Plan Policy Impacts**

The proposed SVSP if approved would define the City's western edge, the treatment of which is subject to City General Plan Policy. According to Roseville General Plan Growth Management - Growth Areas Policy 9, the City's vision is to establish and maintain an edge along the City's western boundary, which includes, among other features, view preservation and aesthetic benefits. The Alternative 2C2 alignment would run in a north-south direction parallel to and within approximately 250 feet of the SVSP's western boundary. As identified in the draft EIS/EIR, implementation of the 2C2 alignment would be inconsistent with this existing City policy. As stated in draft EIS/EIR Table ES-2 (page ES-15), "Segment 2C2 would conflict with the City of Roseville's visual resource policy and result in significant indirect and cumulative impacts." It should be noted that this is the only alternative alignment with an identified significant visual impact.

#### **Biological Impacts**

A portion of Alternative 2C2 runs immediately adjacent to the City's West Roseville Specific Plan Open Space Preserve (as shown in draft EIS/EIR Figure 4.9-3). This open space area includes vernal pool habitat and is protected in perpetuity by a conservation easement. The City has concerns regarding any direct or indirect impacts to this preserve area. The EIR did analyze vegetation and wildlife impacts to this preserve area and found that with protection measures there would not be an adverse impact on biological resources. However given the proximity of the project to the preserve, indirect impact mitigation will likely be required by the USFWS due to the proximity of construction activities. Further, higher than normal mitigation ratios and related costs can be expected because of the areas status as a protected "Preserve."

A.11-2

#### **Preferred Alternative**

The project should minimize the potential for service disruptions during construction and strong consideration should be given to the most direct route that also accomplishes project objectives. In the City's view, Alternative 2A has the least impact to the existing lines during construction, would not result in a significant visual impact, and for technical and environmental reasons should be considered the preferred alignment. The City of Roseville supports selection of Alternative 2A as the preferred route.

A.11-3

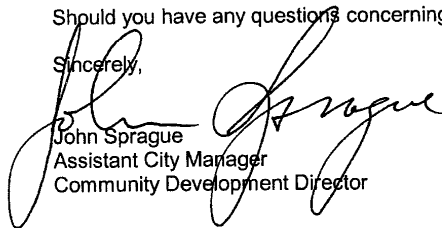
**Comment Set A.11, cont.  
City of Roseville**

Mr. Steve Tuggle, Natural Resource Manager  
SAVSP EIR/EIS Comments

August 27, 2007  
Page 3 of 3

Should you have any questions concerning this letter, please feel free to contact me at 774-5334.






Sincerely,



John Sprague  
Assistant City Manager  
Community Development Director

cc: Paul Richardson  
Nela Luken  
Kathy Pease  
Terri Shirhall  
Mark Morse  
Kam Hung

**Comment Set A.12  
United Auburn Indian Community of the Auburn Rancheria**

					
MIWOK MAIDU	United Auburn Indian Community of the Auburn Rancheria				
	JESSICA TAVARES CHAIRPERSON	KIM DUBACH VICE CHAIR	DAVID KEYSER SECRETARY	DOLLY SUEHEAD TREASURER	GENE WHITEHOUSE COUNCIL MEMBER

August 15, 2007

Western Area Power Administration  
Sierra Nevada Region  
Cherie Johnston-Waldear  
Archaeologist/Native American Liaison  
114 Parkshore Dr.  
Folsom, CA 95630-4710

Subject: Sacramento Area Voltage Support, Draft Supplemental Environmental Impact Statement and Environmental Impact Report

Dear Ms. Waldear:

Thank you for providing a copy of the above referenced document. The United Auburn Indian Community (UAIC) is comprised of Miwok and Maidu people whose traditional homelands include Placer and Nevada Counties, as well as some surrounding areas. The Tribe is concerned about development projects in ancestral territory that have potential to impact culturally important sites and landscapes. We appreciate the opportunity to comment on the proposed project.

Based on the information contained in the Sacramento Area Voltage Support, Draft Supplemental Environmental Impact Statement (SEIS) and Environmental Impact Report (EIR), the UAIC understands that no prehistoric cultural resources have been observed within the study area, nor were any identified as part of the records search process. However, the Tribe would like to express concern regarding the possibility for discovery of previously unidentified cultural resources and/or subsurface remains, particularly in the case of ground disturbing activities such as those proposed.

An inadvertent discovery could potentially have a significant effect on cultural resources, including possible human remains. As a proposed mitigation measure, we suggest that the following language or similar language be added to the Final SEIS and EIR to ensure proper consideration of potential effects to cultural resources during project implementation:

- In the event that prehistoric archaeological resources are discovered during ground disturbing activities, all work in the vicinity of the find shall be halted until such time that a qualified archaeologist is called to the site to assess the significance of the find. The UAIC also wishes to be contacted immediately. If the find is determined to be legally significant by the archaeologist, or culturally important to the Tribal community, project representative shall meet

A.12-1

**Comment Set A.12, cont.**

**United Auburn Indian Community of the Auburn Rancheria**

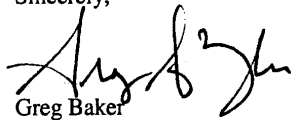
with the archaeologist and the Tribe to determine the appropriate course of action.

- If human remains are discovered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the coroner determines that the remains are of Native American origin, the coroner will notify the Native American Heritage Commission, which will notify a Most Likely Descendant (MLD). The MLD shall be responsible for recommending the appropriate disposition of the remains and any graves goods at that time.

A.12-1, cont.

We would like to thank you in advance for taking these matters into consideration, and for involving the UAIC in the planning process. We look forward to receiving the Final SEIS and EIR. Please contact Shelley McGinnis, Analytical Environmental Services at (916) 447-3479 should you have any questions.

Sincerely,



Greg Baker  
Tribal Administrator

CC: Shelley McGinnis, AES

**Comment Set C.1**  
**Brookfield California Land Holdings, LLC**

**Brookfield California Land  
Holdings, LLC**

August 27, 2007

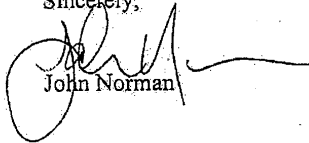
Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

Re: SVC Comments

Dear Mr. Tuggle:

Please find the attached letter signed on behalf of the joint owners of Assessor's Parcel Numbers 35-080-021, and 35-080-12 located in Sutter County, California. As the day to day manager relating to this property I offer up our contact information as shown at the bottom of this letter. Please feel free to contact me if you have any questions regarding the attached letter.

Sincerely,

  
John Norman

C: J. Richter

2271 Lava Ridge Court, Suite 220, Roseville, CA 95661  
916-783-1177 Fax: 916-783-1161

**Comment Set C.1, cont.  
Brookfield California Land Holdings, LLC**

August 7, 2007

[SVS-EIS@wapa.gov](mailto:SVS-EIS@wapa.gov)

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVC Comments**

Dear Mr. Tuggle:

The J Rise Richter Farms Trust, The Richter Kazer 1993 Irrevocable Trust, and Brookfield California Land Holdings LLC, are the owners of 397 acres of land (the "Howsley property") located on Howsley Road in Sutter County (Assessor's Parcel Numbers 35-080-021 and 35-080-12). WAPA's Alternative 2B appears to run through portions of the Howsley property.

C.1-1

This land has been purchased for the primary purpose of habitat mitigation, and we are concerned that the power lines and related improvements will preclude use of portions of the land for habitat purposes, and thus result in economic loss to the owners who must then acquire more expensive habitat land to replace what is lost. The land is being actively farmed and any loss of farmable acreage is of great concern as well.

In order for us to determine the potential impacts, we need to know precisely where any pole lines would be placed, the distance between the pole lines, the width of the land that WAPA would seek to acquire, and whether WAPA would require special access to the property, whether over an existing road or otherwise. We also need to know what concerns resource agencies have about mitigation land impacted with power lines and whether full mitigation credit will be given, notwithstanding the power lines.

C.1-2

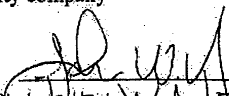
C.1-3

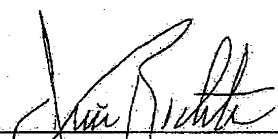
Accordingly, we would appreciate receiving the following information as soon as possible: (i) a detailed map showing the precise location where WAPA proposes to place power lines on the Howsley property; (ii) the spacing, width, height, and footprint of the power poles; (iii) the location of any access to the Howsley property which WAPA would require, including dimensions; (iv) a description of the potential impacts on habitat values at this location; and (v) WAPA's assessment as to whether resource agencies will give habitat credit for land beneath, in and around the power lines.

**Comment Set C.1, cont.**  
**Brookfield California Land Holdings, LLC**

Thank you for your assistance.

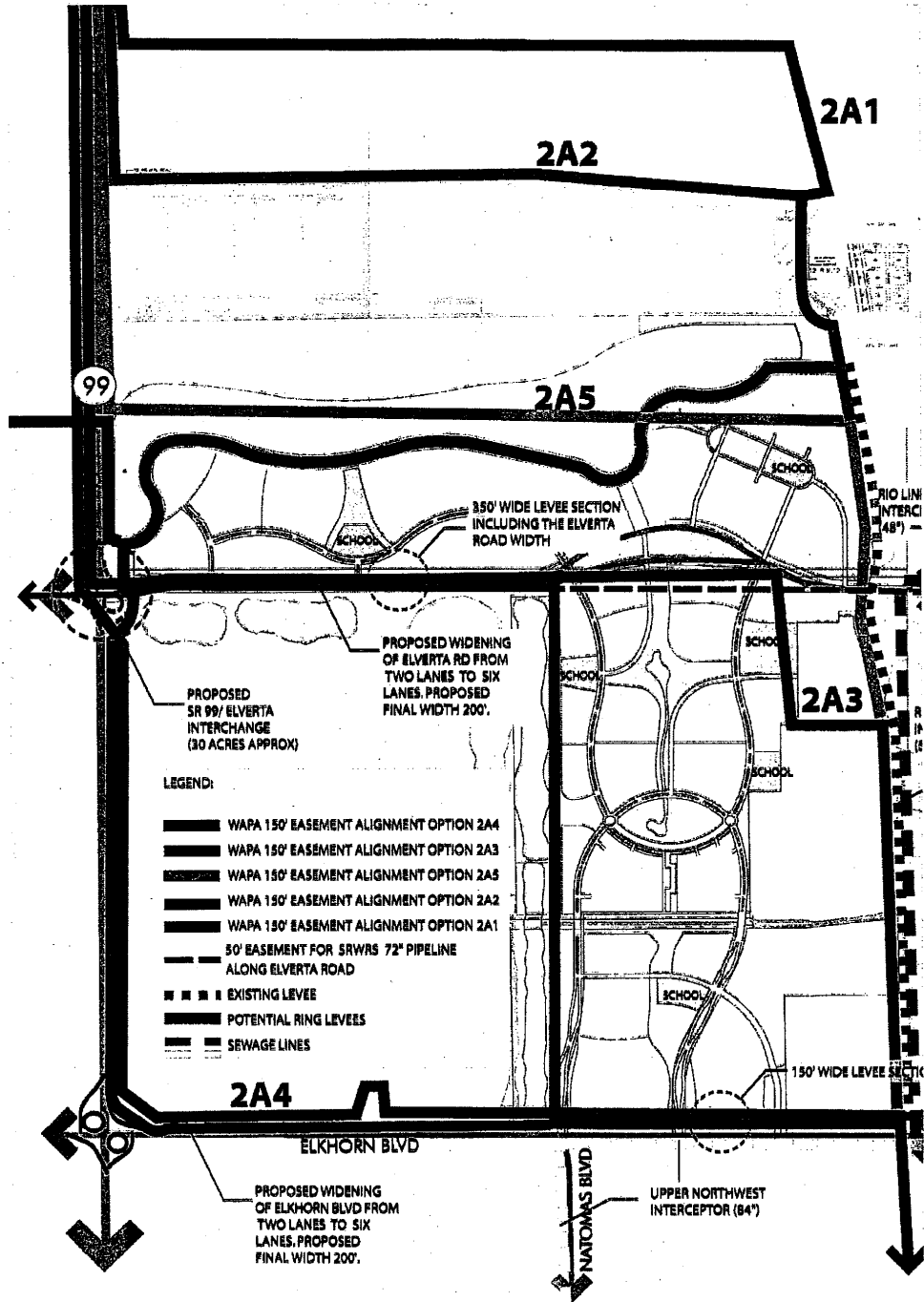
BROOKFIELD CALIFORNIA LAND  
HOLDINGS LLC, a Delaware limited  
liability company

By:   
Name: JOHN W. JOHNSON  
Its: CEO

  
J RISE RICHTER, TRUSTEE OF  
THE J RISE RICHTER FARMS  
TRUST

~~By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Its: \_\_\_\_\_~~

**Comment Set C.1, cont.**  
**Brookfield California Land Holdings, LLC**



PROPOSED SR 99/ ELVERTA INTERCHANGE (30 ACRES APPROX)

PROPOSED WIDENING OF ELVERTA RD FROM TWO LANES TO SIX LANES. PROPOSED FINAL WIDTH 200'.

**LEGEND:**

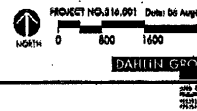
- ▬ WAPA 150' EASEMENT ALIGNMENT OPTION 2A4
- ▬ WAPA 150' EASEMENT ALIGNMENT OPTION 2A3
- ▬ WAPA 150' EASEMENT ALIGNMENT OPTION 2A5
- ▬ WAPA 150' EASEMENT ALIGNMENT OPTION 2A2
- ▬ WAPA 150' EASEMENT ALIGNMENT OPTION 2A1
- ▬ 50' EASEMENT FOR SRWRS 72" PIPELINE ALONG ELVERTA ROAD
- ▬ EXISTING LEVEE
- ▬ POTENTIAL RING LEVEES
- ▬ SEWAGE LINES

EXHIBIT "A"

**NORTH NATOMAS**  
 BROOKFIELD LAND

SACRAMENTO, CALIFORNIA

**WAPA ROUTE SEGMENT I**





**Comment Set C.2**  
**California Indian Heritage Council**

**From:** Randy Yonemura [honortraditions@mail.com]  
**Sent:** Monday, August 27, 2007 10:51 AM  
**To:** waldear@wapa.gov  
**Subject:** WAPA Transmission line - Oroville to Sacramento

Dear Ms Waldear:

The California Indian Heritage Council (representing tribes located within the WAPA project area), sends this email as an official communication to express our concern for the above stated WAPA project. The CIHC holds great concern regarding impact of this project on cultural resource areas within the project APE. We ask to enter into formal consultation regarding project process and the need to develop an administrative plan and site survey parameters to identify potential site and TCP areas prior to construction as well as construction planning and methodologies that will be employed.

I can be reached to discuss this correspondence at 916-533-6336 or 916-421-1600 (my residence if after normal work hours).

We look forward to establishing a line of communication that will allow for our input as well as a positive outcome to your agencies project.

Respectfully,

Randy Yonemura, Principle Agent

CIHC

--

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Get a **FREE** E-mail Account Today - Choose From 100+ Domains

C.2-1

[http://xeonspensacto:8008/Shared%20Documents/Projects/Current Projects/1118-3%20W...](http://xeonspensacto:8008/Shared%20Documents/Projects/Current%20Projects/1118-3%20W...) 9/7/2007

**Comment Set C.3**  
**CEEL Land Corporation**

**CEEL LAND CORPORATION**  
**501 SANTA MONICA BLVD., SUITE 501**  
**SANTA MONICA, CA 90401**

August 7, 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

[SVS-EIS@wapa.gov](mailto:SVS-EIS@wapa.gov)

**RE: SVS Comments**

Dear Mr. Tuggle:

I am writing this letter on behalf of Ceel Land Corporation, which owns a total of 216 acres south of Elverta Road. The Assessor's Parcel Numbers of the land are 201-0080-017, 201-0190-046 and 201-0200-029.

Ceel wishes to register its strong opposition to WAPA's location of overhead power lines along Elverta Road, where they will severely impact the development of the Natomas Joint Vision area by reducing developable acreage, creating negative visual impacts and interfering with the proposed interchange at Highway 99 and Elverta Road. This interchange is necessary to serve all of the growth in the area and seems completely incompatible with major power lines at the same location.

C.3-1

Please eliminate Alternative 2A3 and any other alternative which will impede development in Natomas.

Very truly yours,

**CEEL LAND CORP.**

By:   
Warren Chang, Manager

**Comment Set C.4  
Diepenbrock Harrison**



JOHN V. "JACK" DIEPENBROCK  
KAREN L. DIEPENBROCK  
KEITH W. McBRIDE  
BRADLEY J. ELKIN  
EILEEN M. DIEPENBROCK  
MARK D. HARRISON  
GENE K. CHEEVER  
MICHAEL V. BRADY  
LAWRENCE B. GARCIA  
SUSAN E. KIRKGAARD  
ANDREA A. MATARAZZO  
JOEL PATRICK ERB  
JON D. RUBIN  
MICHAEL E. VINDING  
JENNIFER L. DAUER  
JEFFREY K. DORSO

JEFFREY L. ANDERSON  
SEAN K. HUNGERFORD  
LEONOR Y. DICICAN  
CHRIS A. McCANDLESS  
DAN M. SILVERBOARD  
ANDREW P. TAURIAINEN  
LAMONT T. KING, JR.  
DANIEL J. WHITNEY  
VALERIE C. KINCAID  
BLAIR W. WILL  
KRISTA J. DUNZWEILER  
DAVID R. RICE  
JENNIFER D. BECHTOLD  
SARAH R. HARTMANN  
MARK E. PETERSON


R. JAMES DIEPENBROCK  
(1929 - 2002)

August 9, 2007

[SVS-EIS@wapa.gov](mailto:SVS-EIS@wapa.gov)

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

Re: WAPA Hearing  
Our File No. 2847-002

 Dear Steve:

Thank you for your courtesy and assistance last evening at the WAPA hearing. Please thank Jonathan for me as well.

As to the development schedule for the Natomas Joint Vision, I enclose a copy of my letter of May 18, 2007 to Heidi Miller, which sets out the planning schedule in some detail. Please call me if I can provide any further information.

Very truly yours,

DIEPENBROCK HARRISON  
A Professional Corporation



By: Karen L. Diepenbrock

KLD/gpf  
Enclosure

I:\KLD\2847.002.Brookfield.North Natomas\354.ltr.Steve Tuggle from KLD [08-09-07].doc

400 CAPITOL MALL  
SUITE 1800  
SACRAMENTO, CA 95814  
[WWW.DIEPENBROCK.COM](http://WWW.DIEPENBROCK.COM) 916 492.5000  
FAX: 916 446.4535

**Comment Set C.4, cont.  
Diepenbrock Harrison**



JOHN V. "JACK" DIEPENBROCK  
KAREN L. DIEPENBROCK  
KEITH W. McBRIDE  
BRADLEY J. ELKIN  
EILEEN M. DIEPENBROCK  
MARK D. HARRISON  
GENE K. CHEEVER  
MICHAEL V. BRADY  
LAWRENCE B. GARCIA  
SUSAN E. KIRKGAARD  
ANDREA A. MATARAZZO  
JOEL PATRICK ERB  
JON D. RUBIN  
MICHAEL E. VINDING  
JENNIFER L. DAUER  
JEFFREY K. DORSO

JEFFREY L. ANDERSON  
MATTHEW R. BERRIEN  
SEAN K. HUNGERFORD  
LEONOR Y. DICICAN  
CHRIS A. McCANDLESS  
DAN M. SILVERBOARD  
ANDREW P. TAURIJAINEN  
VALERIE C. KINCAID  
BLAIR W. WILL  
KRISTA J. DUNZWEILER  
DAVID R. RICE  
JENNIFER D. BECHTOLD  
SARAH R. HARTMANN  
MARK E. PETERSON

R. JAMES DIEPENBROCK  
(1929 - 2002)

May 18, 2007

**Via U.S. Mail and E-mail to: [hmiller@wapa.gov](mailto:hmiller@wapa.gov)**

Ms. Heidi Miller  
Western Area Power Administration  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: Sacramento Voltage Support ("SVS") Project  
Proposed "2A" Alignment**

Dear Heidi:

The purpose of this letter is to give the Western Area Power Administration ("WAPA") an update on the status of development of the Joint Vision area. The Joint Vision area is located in the unincorporated area of the County of Sacramento and proposed to be annexed to the City of Sacramento.

As you know, we believe development in the Joint Vision area will be **severely adversely** impacted if WAPA adopts the "2A" alignment and installs two 230 KV lines along Elverta Road within the Joint Vision area and within the proposed alignment of the new Elverta/SR 70/99 Exchange. I also enclose an update regarding the new interchange at Elverta Road and SR 70/99. We believe the interchange and the WAPA lines are incompatible.

We ask that you incorporate this information within the EIS/EIR for the SVS project so that decision-makers will have access to this critical information.

I. **Status of Joint Vision Planning Efforts.** Phase 1 of the Natomas Joint Vision implementation process has been completed. This phase consisted of adoption of the Memorandum of Understanding by the City of Sacramento and the County of Sacramento and agreement between the City and County on basic principles of land use and economic development relative to development within the Natomas Joint Vision area.

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SUITE 1800  
SACRAMENTO, CA 95814  
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**Comment Set C.4, cont.  
Diepenbrock Harrison**

**IEPENBROCK HARRISON**

Ms. Heidi Miller  
May 18, 2007  
Page 2

Phase 2 is now in process. Phase 2 consists of the following tasks:

1. **Development of an Open Space program.** This is currently under way, on schedule, and expected to be completed in the winter of 2007.
2. **Project framework report to the City Council and the Board of Supervisors.** This report is on track to go to the City and County in the winter of 2007.
3. **General Plan Amendment.** The General Plan Amendment for the Joint Vision development is expected to be adopted in the winter of 2008.
4. **Environmental Impact Report.** The Environmental Impact Report is expected to be complete in the winter of 2008.
5. **Municipal Services Review.** The Municipal Services Review is expected to be completed by the winter of 2008. RBF Consulting has been hired to prepare the Municipal Services Review and the Environmental Impact Report.
6. **Sphere of Influence Amendment.** The Sphere of Influence Amendment is expected to be before the Local Agency Formation Commission in December 2008.
7. **Natomas Basin Habitat Conservation Plan Effects Analysis.** The Natomas Basin Habitat Conservation Plan Effects Analysis is linked to the Open Space Study and is expected to commence shortly.
8. **Flood protection project design and funding.** Flood protection project design and funding will be completed by the Sacramento Area Flood Control Agency ("SAFCA"). The community-wide assessment for flood control improvements was approved by voters in April 2007, with an 81% "yes" vote. Project design will be completed in 2007.

Phase 3 will begin following completion of the Phase 2 tasks and will include development of the community plan and annexation of the Joint Vision area to the City of Sacramento.

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**Comment Set C.4, cont.  
Diepenbrock Harrison**

**DIEPENBROCK HARRISON**

Ms. Heidi Miller  
May 18, 2007  
Page 3

II. **Status of the new interchange at Elverta Road and SR 70/99.** We are informed that the County of Sacramento is the lead agency for the planning and development of the new interchange at Elverta Road and SR 70/99. The Project Study Report ("PSR") is expected to begin in July, 2007 and be completed in 2009. The Plans, Specifications and Estimates ("PS&E") will be completed in 2010 with actual construction beginning March, 2011 and completed in the winter of 2012-13.

Thank you for the opportunity to provide this information.

Very truly yours,

Diepenbrock Harrison  
A Professional Corporation



By: Karen L. Diepenbrock

KLD/nvl

Comment Set C.4, cont.  
Diepenbrock Harrison



JOHN V. "JACK" DIEPENBROCK	JEFFREY L. ANDERSON
KAREN L. DIEPENBROCK	SEAN K. HUNGERFORD
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	R. JAMES DIEPENBROCK (1929 - 2002)

August 27, 2007

[SVS-SEIS@wapa.gov](mailto:SVS-SEIS@wapa.gov)

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

Re: SVS Comments

Dear Mr. Tuggle:

These comments are submitted on behalf of Brookfield Land Company and the owners of more than 2,600 acres in the Natomas Basin. The purpose of this letter is to comment on your Alternatives 2A3, 2A4 and 2A5. We ask that WAPA delete Alignments 2A3, 2A4 and 2A5 from further consideration for the reasons set forth below. C.4-1

1. **HOMELAND SECURITY.** We understand homeland security has been identified as a reason for separating these new power lines from the existing right-of-way. Given the great distances over which the lines converge, persons seeking to disrupt service can easily focus on the main segments where all lines will be affected and will seek to disrupt the "weakest link". For this reason, we do not believe homeland security will be improved if one of the longer, more impactful routes is selected. We believe the alternatives that utilize existing right-of-way should be the preferred alternatives. C.4-2

2. **INFRASTRUCTURE CONFLICTS.** Alternatives 2A3 and 2A5 conflict significantly with infrastructure planned by the City of Sacramento, the County of Sacramento, and Brookfield Land for proposed development in the Natomas Joint Vision area. They also conflict with existing CalTrans right-of-way and a proposed new interchange which is currently being studied. Please see the map attached as Exhibit A which visually illustrates these issues. C.4-3

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**Comment Set C.4, cont.  
Diepenbrock Harrison**

**DIEPENBROCK HARRISON**

August 27, 2007  
Page 2

Please consider the following conflicts with existing and proposed infrastructure:

- Alternative 2A3 (as it extends along the north side of Elverta Road) conflicts with the currently planned widening of Elverta Road from two lanes to six lanes.
- Alternative 2A3 conflicts with a currently planned 50-foot easement for a 72-inch water pipeline, which runs along Elverta Road.
- Alternative 2A3 conflicts with existing levees along the north side of Elverta Road. Additional flood protection levees are being analyzed along Elverta Road, which would result in additional constraints. This is a very serious conflict.
- Alternative 2A3 conflicts with the proposed six-lane overpass, two-lane on-off ramp interchange at Elverta Road, which CalTrans and the County of Sacramento are in the process of designing, and which will be under construction in March 2011. Alignment 2A3 conflicts with the proposed interchange location.
- Alternatives 2A3 and 2A5 parallel and cross CalTrans right-of-way and create potential conflicts and constraints all along SR 70/99.
- All this infrastructure needs to be maintained, expanded and replaced over time. The power lines will make this far more costly and complicated.

C.4-3, cont.

3. **CONFLICTS WITH SCHOOLS.** California state law requires that parcels containing school sites be set back substantially from high power lines. The attached map, which shows a conflict between Route A-3 and a proposed school site, illustrates the problem. School siting is always challenging; adding the additional complication of needing to avoid two 230 KV lines only makes this process more complicated and potentially detrimental to the schoolchildren as optimal locations are discarded because of power line impacts. The school districts will need flexibility in locating facilities relative to future surrounding land uses. The power lines will be a excessively limiting constraint in that process.

C.4-4

4. **VISUAL CONFLICTS.** Please consider the following visual intrusions:

- Alternative 2A3 will (i) run down SR70/99 next to the new development, then (ii) will run almost the whole length of new development north of Elverta Road and (iii) will swing south and bisect the northeast quadrant of the new development south of Elverta Road.
- Alternative 2A4 runs down SR 70/99 where it will impact the community separator and new development next to SR 70/99.
- Alternative 2A5 runs along and through the entire northern edge of development.

C.4-5



**Comment Set C.4, cont.**  
**Diepenbrock Harrison**

**DIEPENBROCK HARRISON**

August 27, 2007  
Page 3

Homes in every part of these new developments will be up against power lines, which citizens find unsightly and highly objectionable.

C.4-5, cont.

WAPA has cited the visual conflicts that exist relative to Alternative 2C2; similarly, the visual intrusions into projected new and existing development caused by Alternatives 2A3, 2A4 and 2A5 should receive the same deference.

**5. CONFLICTS WITH PLANNING PRINCIPLES AND WITH SACOG'S "BLUEPRINT".**

C.4-6

The City of Sacramento (as well as most urban planners) is a strong advocate for "smart growth", encouraging compact, mixed use development near urban cores, served by transit as well as roadways, with higher densities, and, in the case of Natomas, protected from flooding by strong stable levees. Smart growth principles guided the Sacramento Area Council of Government's "Blueprint" for urban development adopted in December 2004; the "Blueprint" includes the Natomas Joint Vision area as a future growth area. Placing two 230 KV lines through the Joint Vision will have a major adverse effect on new development as follows:

- There will be much less land for development close to the urban core, thereby reducing densities. C.4-7
- Access to new development will be restricted and impaired by power lines along SR70/99, along Elverta Road and through development south of Elverta Road. C.4-8
- Power lines will impact views and diminish the appeal of the new communities. C.4-9
- Power lines will conflict with new infrastructure such as roadways, levees, water lines, schools, etc. See the more complete discussion above. C.4-10
- Power lines will negatively impact open space by infringing on views and diminishing available acreage for these uses. C.4-11

"Blueprint" communities are viewed as highly beneficial areas for development and should be favored and protected from power line encroachment. C.4-12

**6. CONFLICTS WITH COMMUNITY SEPARATOR.** Alternatives 2A3, 2A4 and 2A5 conflict with the planned community separator approximately one mile long and two and one-half miles wide at the Sacramento/Sutter County line as follows: C.4-13

- Brookfield proposes an almost **400 acre lake** at this location. The power lines would run through the middle of the lake. See map attached as Exhibit "A". C.4-14
- The power lines will place a **visual intrusion** along SR 70/99, next to the separator, and in the case of Alternative 2A5, through the separator and next to new development on the south for over two and one-half miles.

**Comment Set C.4, cont.  
Diepenbrock Harrison**

**DIEPENBROCK HARRISON**

August 27, 2007  
Page 4

- The value of the community separator as a community visual amenity will be diminished. The community separator is intended to be a vital part of the Sacramento landscape and create a visual open space corridor at the northern entrance to the City of Sacramento for the benefit of the entire Sacramento community. C.4-14, cont.
  - Alternative 2A5 will **conflict with land uses** on both sides of the alignment, which uses include habitat and open space to the north; and a lake and homes to the south. C.4-15
  - **The exact configuration of the community separator is not yet known** and is being determined in the planning process with input from all concerned. Alternative 2A5 assumes the location of the separator is already set, and will not be varied in any way. C.4-16
7. **HEALTH CONCERNS.** Many citizens are seriously concerned about potential health hazards from emissions from high power lines. These perceived health risks cause community unrest and reduce property values for all nearby property, as many people refuse to live next to power lines. Placing commercial uses along Elverta Road is **not** a solution: good planning principles argue for locating shopping toward the interior of development where it is accessible to residents by foot and bicycle. C.4-17
8. **POWER LINES SHOULD NOT BISECT EXISTING LAND OWNERSHIP.** Alternative 2A5 will: C.4-18
- go through the **middle** of APN 201-0120-035 (adjacent to SR 70/99) owned by the Lim, Yee and Chang families;
  - **pass through** the Willey and Haesun Koo properties;
  - go through the **middle** of the 320-acre parcel owned by Lechan Land Corp. (APN 021-0110-023);
  - go through the **middle** of APN 201-0110-022;
  - go through the **middle** of the DeWit Farms property, and then
  - **run along the north side** and the **entire eastern side** of the 105-acre Scheidel parcel (APN 201-0110-020).

Where alternate routes exist, good planning principles suggest that no owner's parcel should be cut in half by power lines, nor should power lines run along two sides of an owner's property as occurs with the Scheidel parcel and the Lim/Yee/Chang parcel next to SR 70/99 (if Alternative 2A3 is selected). All of the parcels just named are farmed,

**Comment Set C.4, cont.  
Diepenbrock Harrison**

**DIEPENBROCK HARRISON**

August 27, 2007  
Page 5

and power lines through the middle of the properties, with a requirement for access roads, will also interfere with crop land and farming.

C.4-18, cont.

9. **IMPACTS ON EXISTING HOMES.** Alternative 2A5 will negatively impact existing homes located off of East Levee Road and, in at least one instance, will place high power lines within 50 feet of a resident's bedroom. Alternative 2A3 does the same at Elverta Road.

C.4-19

10. **NO ENVIRONMENTAL VARIATIONS AMONG ALTERNATIVES.** The EIS/EIR says that there is little environmental variation among the alternatives. Given this, **alternatives along existing rights-of-way make the most sense** and will have the least impact on those living near and in the vicinity of a proposed alignment.

C.4-20

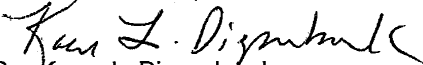
We urge WAPA to select an alternative which will not adversely impact existing and future residents or interfere with significant planned infrastructure. Please delete Alternatives 2A3, 2A4 and 2A5 from further consideration.

C.4-21

Thank you for your consideration.

Very truly yours,

DIEPENBROCK HARRISON  
A Professional Corporation

  
By: Karen L. Diepenbrock

KLD/gpf

**Comment Set C.5**  
**Lechan Land Corporation**

**LECHAN LAND CORPORATION**  
501 Santa Monica Blvd. Ste 501  
Santa Monica, CA 90401

August 7, 2007

**SVS-EIS@wapa.gov**

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVS Comments**

Dear Mr. Tuggle:

I am writing this letter on behalf of Lechan Land Corporation, which owns a total of 320 acres on the north side of Elverta Road. The Assessor's Parcel No. is 201-0110-023. We oppose any power lines through this land. Your Alternative 2A3 goes over the entire southern portion of this parcel next to Elverta Road and your Alternative 2A5 cuts through the middle of this land and will impact farming operations.

C.5-1

Lechan strongly objects to power lines through the middle of its land.

Lechan objects to the visual intrusions, the reduction in developable land, the limitations on access, and the greater difficulty in developing.

C.5-2

We understand that WAPA reopened the environmental process because of conflicts with proposed new development. Please do not move the lines to another new development area.

Very truly yours,

**LECHAN LAND CORP.**

By: 

Warren Chang, Manager

**Comment Set C.6**  
**Measure M Owner's Group (represented by George M. Carpenter, Jr., Attorney at Law)**

**GEORGE M. CARPENTER, JR.**  
ATTORNEY AT LAW  
141 Morella Court · Roseville · California 95747  
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August 27, 2007

**Via Electronic Mail**  
**First Class Mail**

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
114 Parkshore Drive  
Folsom, California 95630

**Re: Sacramento Area Voltage Support Draft Supplemental Environmental Impact Statement (SEIS) and Environmental Impact Report (EIR)**

Dear Mr. Tuggle:

I am writing to provide comments on the Draft SEIS and EIR for the Sacramento Area Voltage Support project ("Project"). I represent the Measure M Owner's Group which is developing the 7500-acre Sutter Pointe Specific Plan in south Sutter County.

Sutter Pointe Background.

The Sutter Pointe development is centered around the intersection of Riego Road and State Route 99/70. Sutter Pointe is implementation of Measure M, an advisory measure approved in November 2004 by the voters of Sutter County. Sutter Pointe will be master-planned community with approximately 47,000 new residents in 17,500 dwelling units and 3,600 acres of employment uses. In January 2006, the Measure M Group submitted to Sutter County a general plan amendment application. In July 2006, the Measure M Group submitted a specific plan application. We anticipate the draft environment impact report to be circulated for public comment in December of this year.

Comments on the Draft SEIS and EIR.

1. SVS Segments 2A1, 2A2, 2A3, 2A4, and 2A5 run through the heart of our plan area. SVS Segment 2B runs along the eastern boundary of our plan area. We would strongly encourage the selection of alignment 2C1 or 2C2 to avoid land use conflicts, conflicts with proposed transportation facilities, and potential significant aesthetic impacts to the proposed Sutter Pointe plan area.

C.6-1

2. The Draft SEIS and EIR fails to properly characterize the status of the south Sutter County land uses. Currently, the Sutter Pointe area is used primarily for agriculture and it has a general plan designation of "South Sutter County Industrial/Commercial Reserve"

C.6-2

**Comment Set C.6, cont.**

**Measure M Owner's Group (represented by George M. Carpenter, Jr., Attorney at Law)**

Mr. Steve Tuggle  
Western Area Power Administration  
August 27, 2007  
Page 2

("SSCI/C"). However, in November 2004, the voters of Sutter County approved Measure M, an advisory measure with specific land uses, acreages and location. Specifically, Measure M told the Board of Supervisors of Sutter County to plan for a 7,500-acre mixed use community containing at least 3,600 acres of employment uses, at least 1,000 acres of parks, open spaces, schools and community facilities, and no more than 2,900 acres of residential uses, with no more than 17,500 new dwelling units. The Draft SEIS and EIR characterizes the area as industrial and agricultural. This characterization fails to recognize the clear direction of the voters of Sutter County and the efforts of the County and landowners since the ballot measure was approved. Sutter Pointe is more than just a speculative land development project; it has voter approval and specific land uses already set forth. The entire impact analysis of the Draft SEIS and EIR should be redone to reflect accurately the future planned land uses in south Sutter County. The impacts of SVS Segments 2A1, 2A2, 2A3, 2A4, 2A5, and 2B have potentially significant and unavoidable impacts to planned residential land uses in south Sutter County.

C.6-2 cont.

3. We have spent the last 2 ½ years working on a land use plan that would be significantly impacted by SVS Segments 2A1, 2A2, 2A3, 2A4, and 2A5. The Sutter Pointe Town Center is going to be a walkable, mixed-use, area of the Sutter Pointe community. It will be located near the southeast corner of State Route 99 and Riego Road. We have also located a major residential village north of Riego Road, between State Route 99 and Pacific Avenue. SVS Segments 2A1, 2A2, 2A3, 2A4, and 2A5, with their setbacks, conflicts with residential and commercial land uses and visual impacts would compel changes to our land use plan, which would in turn compel changes to all of our nearly complete master infrastructure planning. The potential impacts of these segments to our planned land uses should be evaluated in the Draft SEIS and EIR.

C.6-3

4. There is currently an approved Project Report for an interchange at State Route 99 and Riego Road. With the passage of Proposition 1B, state bond funds will be available to construct this facility, with an estimated start of construction date in 2011. Currently, Sutter County is preparing a Supplement Project Report to reflect current traffic estimates. The Draft SEIS and EIR should evaluate the impacts of SVS Segments 2A1, 2A2, 2A3, 2A4, and 2A5 to be sure that they do not conflict with the interchange facility.

C.6-4

5. The Sutter Pointe land plan identifies residential land uses on the east side of the plan area where SVS Segment 2B crosses Sankey Road. The impacts of Segment 2B on the planned residential land uses should also be evaluated in the Draft SEIS and EIR.

C.6-5

6. In the draft Sutter Pointe Specific Plan, we have proposed policies which would specifically prohibit SVS Segments 2A1, 2A2, 2A3, 2A4, and 2A5 from being located as shown in the Draft SEIS and EIR. The Draft SEIS and EIR should evaluate the Project's consistency with such policies. A copy of the policies is attached to this letter.

C.6-6

**Comment Set C.6, cont.**  
**Measure M Owner's Group (represented by George M. Carpenter, Jr., Attorney at Law)**

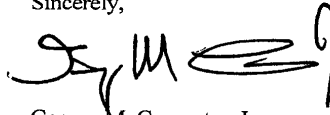
Mr. Steve Tuggle  
Western Area Power Administration  
August 27, 2007  
Page 3

We look forward to working with you on the resolution of these issues. Please feel free to contact our civil engineer, Mr. Ken Giberson, PE, if you need additional information. His contact information is as follows:

Ken Giberson, PE  
MacKay & Soms Civil Engineers, Inc.  
1771 Tribute Road, Suite E  
Sacramento, CA 95815  
916-929-6092

Thank you for allowing us to provide comments on the proposed project.

Sincerely,



George M. Carpenter, Jr.

cc: Doug Libby, Sutter County Community Services Department  
Ken Giberson, MacKay and Soms

Comment Set C.6, cont.

Measure M Owner's Group (represented by George M. Carpenter, Jr., Attorney at Law)

INFRASTRUCTURE

9.5.6 SITING OF ENERGY AND COMMUNICATIONS FACILITIES

Good planning practices will assist in minimizing potential land use conflicts, reducing visual impacts, preserving existing land uses, avoiding biological and cultural resources, and minimizing the health, safety, environmental, and aesthetic impacts of the proposed facilities.

*Policy 9.5-2: The siting and design of energy facilities within Sutter Pointe shall ensure the provision of safe, reliable, efficient and economical utility service.*

**ELECTRICAL TRANSMISSION AND DISTRIBUTION FACILITY SITING POLICIES**

More than one utility company should share existing and future transmission corridors. Transmission facilities should be located in a manner that maximizes the screening potential of topography and vegetation. Preference will be given to the location of transmission lines first within existing transmission rights of way; and secondly adjacent to railroads.

*Policy 9.5-3: Electrical transmission and distribution facilities less than 100,000 volts may be located in any land use zone and will be located underground in easements or rights of way that permit access for maintenance with minimal disruption of surrounding properties.*

*Policy 9.5-4: Electrical transmission facilities of 100,000 volts and greater may be located in easements or rights of way that permit access for maintenance with minimal disruption of surrounding properties. Siting transmission facilities shall avoid existing or planned urban areas.*

*Policy 9.5-5: Siting of transmission lines of 100,000 volts or greater capacity through established or planned residential areas shall be prohibited. The location and design of new transmission towers near urban areas shall be done in a manner that minimizes visual and environmental impacts, including impacts to view sheds. Where feasible, utilize existing transmission poles to accommodate new overhead transmission lines.*

*Policy 9.5-6: Monopole construction, where practicable, shall be used for new transmission facilities to reduce the visual impact on a corridor's middle and distant views.*

ADMINISTRATIVE CHART - FOR PROJECT TEAM REVIEW ONLY



**Comment Set C.7**  
**Natomas Basin Conservancy**

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phone: 916.649.3331  
fax: 916.649.3322

August 27, 2007



Steve Tuggle  
Natural Resource Manager  
Department of Energy  
Western Area Power Administration  
114 Parkshore Drive  
Folsom, CA 95630-4710

Re: Comments on Sacramento Area Voltage Support Draft  
Supplemental Environmental Impact Statement and Environmental Impact  
Report

Dear Mr. Tuggle:

The Natomas Basin Conservancy (the "Conservancy") appreciates the opportunity to comment on the Draft Supplemental Environmental Impact Statement and Environmental Impact Report (the "DEIS/DEIR") on the Sacramento Voltage Support Project (the "Project"). We have separately communicated to your office our concerns regarding certain elements of the Project itself (as distinct from the environmental document), and plan to remain active as the process for Project planning moves forward. The Conservancy has particular concerns regarding the analysis of Alternatives A-1, A-2, A-3, A-4 and A-5 (sometimes referred to collectively as "Alternative A"). These alternatives include transmission line segments which would traverse land owned by the Conservancy and managed by the Conservancy pursuant to the Natomas Basin Habitat Conservation Plan ("NBHCP"). The construction of facilities as contemplated in Alternative A and the maintenance of those facilities into the indefinite future will have immediate as well as long-term adverse impact upon Conservancy property and Conservancy operations.

In the Conservancy's view, the DEIS/DEIR fails to consider adequately the potential environmental impacts of the Project, and particularly the impacts of Alternative A of the Project. Our principal concerns may be summarized as follows:

A. The DEIS/DEIR fails to take into consideration the relative impact upon Biological Resources (particularly upon the Giant Garter Snake and the Swainson's Hawk) of Alternative A as compared to Alternatives B and C.

C.7-1

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*executive Director*

## Comment Set C.7, cont. Natomas Basin Conservancy

Western Area Power Administration  
August 27, 2007  
Page 2



As noted above, and as described generally in the DEIS/DEIR, Alternative A will substantially disturb Conservancy lands and operations. As the Plan Operator for the NBHCP the Conservancy's fundamental mission is the preservation and enhancement of covered species, including notably the Giant Garter Snake and the Swainson's Hawk. The DEIS/DEIR considers three sets of alternatives: Alternative A, which affects Conservancy land, and Alternatives B and C, which do not. Alternative A will militate against, and possibly compromise the Conservancy's protective operations; Alternatives B and C will not. Western should specifically discuss and analyze the species-protective role of the Conservancy to afford the public and the decision-makers the opportunity to make the most prudent selection among the available alternatives.

C.7-2

In a similar vein, the Conservancy notes that pursuant to the relevant resource agency environmental documents,<sup>1</sup> all of the approximately 54,000 acres in the Natomas Basin which are not permitted for present or eventual urban uses are deemed to be available as potential mitigation land to offset the impacts of such urban development on covered species. Accordingly, use of land for Alternative A, which land is inside the Basin, would inevitably reduce available mitigation opportunities (and mandated mitigation ratios) relative to Alternatives B and C.

C.7-3

In this context we note that the Conservancy was incorporated in 1994. The NBHCP, pursuant to which Incidental Take Permits were issued to co-permittees the City of Sacramento, the County of Sutter, the U.S. Fish & Wildlife Service and the California Department of Fish & Game, was finalized in 2003. Since that date, the Conservancy has served as Plan Operator for the co-permittees. Among its responsibilities as Plan Operator are the acquisition and maintenance of rice fields for the benefit of the Giant Garter Snake (together with other terrestrial species of concern) and the acquisition and management of nesting and foraging habitat for the Swainson's Hawk (among other avian species of concern). These responsibilities are detailed in the NBHCP, the Biological Opinion, the Record of Decision and other publicly-available documents and have been discussed with representatives of Western during consultations referenced very briefly in the DEIS/DEIR. These documents, together with a summary of consultations should be described and analyzed in detail in the

C.7-4

<sup>1</sup> See Record of Decision for the Proposed Issuance of Section 10(a)(1)(B) Incidental Take Permits Associated with the Natomas Basin Habitat Conservation Plan (U.S. Fish & Wildlife Service, 2003) (the "ROD"); Biological Opinion (U.S. Fish & Wildlife Service, June 24, 2003) (the "Biological Opinion").

**Comment Set C.7, cont.**  
**Natomas Basin Conservancy**

Western Area Power Administration  
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 Page 3



DEIS/DEIR, as such discussion and analysis should inform selection of the preferred alternative route.

C.7-4, cont.

B. The DEIS/DEIR fails to consider publicly-available information produced by the Conservancy which could further mitigate impacts on the Giant Garter Snake.

The analysis of the Alternative A routes, which traverse rice fields owned and managed by the Conservancy may impact the Giant Garter Snake to a greater extent than discussed in the DEIS/DEIR. Moreover, extensive materials prepared by the Conservancy through its Technical Advisory Committee and its consultants, and approved by its Board following public comment have apparently not been reviewed by Western during the preparation of the DEIS/DEIR. Such materials build upon the voluminous Biological Opinion and Record of Decision referenced above. If such materials have been reviewed, those materials have not been discussed in the environmental document and are not cited in the references section of the document. Such resources include the Annual Reports of the Conservancy as well as interim biological and site specific studies prepared by the Conservancy and made available to the public.

C.7-5

As reflected in such materials, the Conservancy has gone to great lengths to develop land use methodologies (particularly rice field land use methodologies) which mitigate impacts upon the Giant Garter Snake and other terrestrial species of concern. We believe that these methodologies provide more comprehensive, and hence superior, mitigation of impacts upon the Snake which will occur as a result of the Project. These methodologies should have been studied and the potential mitigations which they yield should have been considered for adoption.

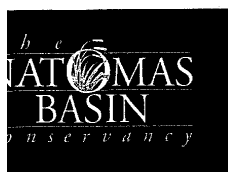
C. The DEIS/DEIR may understate a potential harm to the Swainson's Hawk.

The Conservancy has gone to great lengths to preserve and enhance nesting and foraging habitat for the Swainson's Hawk. The DEIS/DEIR does not adequately consider the potential impact of the structures to be constructed as elements of the Project (including lines and cables) upon the Swainson's Hawk, which is a soaring forager. Based on the Conservancy's twelve years of experience, we believe that conflicts between the hawk and the physical facilities which make up the Project will be more significant than is described and analyzed in the DEIS/DEIR. Again, the extensive reports and analyses prepared in conjunction with the Conservancy's

C.7-6

**Comment Set C.7, cont.**  
**Natomas Basin Conservancy**

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Page 4



Annual Reports would be of help to Western and the public in understanding the Project and mitigating its potential impacts.

C.7-6, cont.

D. The DEIS/DEIR may understate the risks of the Project to aerial operations in support of agriculture.

C.7-7

The Health & Safety section should include complete information and analysis regarding the potential impact of the Project upon aerial applications of seed and crop protection on the rice fields it will traverse. Although the Conservancy (operating primarily through farm lease arrangements) is not unique in using aerial applications extensively, we do want to make sure that the increased risk to the operations, as presented by the siting of additional high tension lines and support structures on rice lands, is adequately analyzed, and that appropriate mitigation measures are imposed.

We also note in this context that if the Conservancy is obliged to substitute ground applications for aerial applications due to safety considerations, the potential adverse budgetary impacts could be substantial. This, in turn could undermine the Conservancy's long-term Finance Model, creating a threat to the viability of the NBHCP itself.

E. The cumulative impacts conclusions may not be well-founded.

We must question the accuracy of two of the comments set forth in the cumulative impacts subsection of the Biological Resources section of the DEIS/DEIR (p. 4.27).

The DEIS/DEIR recites that:

"Consultation with the appropriate agencies would determine what mitigation may be required to offset impacts to threatened or endangered species habitat; therefore, this project would not contribute to a loss of habitat."

C.7-8

We consider this to be flatly incorrect. As outlined above, we do not think it is reasonable to conclude that Alternative A would result in no loss of habitat.

Also, on p. 4.27 the DEIS/DEIR concludes that:

"The expected planned growth within the Sacramento area would result in loss of habitat for special-status species. By participating

C.7-9

**Comment Set C.7, cont.  
Natomas Basin Conservancy**

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with consulting agencies, HCP, and other conservation and mitigation efforts, these losses would be reduced to less than significant."

C.7-9, cont.



We believe that to the extent the conclusion is based on the assumption that there will effectively be no loss of habitat, it is flawed. Moreover, given our experience that Western has failed to consult constructively with this organization, the NBHCP Plan Operator, we do not think that it is prudent or appropriate to assume that its future unspecified consultations with resource agencies will result in effective biological mitigation for the Project.

C.7-10

Thank you for the opportunity to comment.

Very truly yours,

THE NATOMAS BASIN CONSERVANCY

A handwritten signature in black ink, appearing to read 'John R. Roberts', is placed below the printed name.

John R. Roberts  
Executive Director

cc: City of Sacramento  
County of Sutter  
Conservancy Board of Directors  
U.S. Fish & Wildlife Service  
Calif. Dept. of Fish & Game

**Comment Set C.8**

**Regional University Specific Plan (represented by Remy, Thomas, Moose, and Manley, LLP)**

**REMY, THOMAS, MOOSE and MANLEY, LLP**

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August 27, 2007

Mr. Steve Tuggle  
Natural Resources Manager  
Western Area Power Administration, Sierra Nevada Region  
114 Parkshore Drive  
Folsom, California 95630-4710

Re: Draft Supplemental Environmental Impact Statement and Environmental Impact Report (“SEIS/EIR”) for the Sacramento Area Voltage Support Transmission Project

Dear Mr. Tuggle:

These comments are submitted on behalf of the applicants of the proposed Regional University Specific Plan (“RUSP”). The proposed RUSP project site encompasses approximately 1,136 acres in unincorporated west Placer County. While generally supportive of municipal utilities and their efforts to provide adequate infrastructure to meet the region’s growing electricity needs, the applicants of the proposed RUSP object to the inclusion of Alternative 2C2 in the above referenced SEIS/EIR, and request deletion of Alternative 2C2 from further consideration in the SEIS/EIR.

Alternative 2C2 traverses an area that has been designated by local planning agencies for urban development since 1994. Specifically, Alternative 2C2 bisects an area projected for urban development in the 1994 Placer County General Plan, as part of the Future Study Area west of Fiddymont Road, north of Baseline Road, and south of Pleasant Grove Creek all the way to the County line.

C.8-1

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**Comment Set C.8, cont.****Regional University Specific Plan (represented by Remy, Thomas, Moose, and Manley, LLP)**

Mr. Steve Tuggle

Aug. 27, 2007

Page 2

The RUSP project site is within an area designated as a Future Study Area in the Placer County General Plan. The Future Study Area is bounded by Baseline Road to the south, the County line to the west, Fiddymont Road to the east (generally), and Pleasant Grove Creek to the north (generally). The General Plan states that future growth may occur in the unincorporated area or in areas annexed to an adjacent city. Thus, Placer County has planned for urban development on the RUSP project site since the 1994 General Plan.

C.8-1, cont.

Southwest Placer County is considered one of the prime locations for dense development in Sacramento Area Council of Government (SACOG)'s Blueprint project, as it is located in the center of the Roseville/Rocklin-Airport-McClellan job triangle and is close enough to Sacramento to allow for integration into a regional transit network. The RUSP project is proposed at densities and mix of uses supportive of the Blueprint project. Alternative Alignment 2C2 undermines implementation of the SACOG Blueprint project in western Placer County, and undermines the last decade's worth of land use planning for this portion of Placer County. As illustrated in Figure 4.9-3 of the Draft SEIS/EIR, Alignment 2C2 follows the northern boundary of the RUSP and will affect planned residential development, as well as planned roadways, in the RUSP.

A review of the Draft SEIS/EIR compared to these existing and future urban land uses indicates significant adverse environmental impacts in a broad range of impact areas. A brief summary of such impacts follows:

1. Air Quality

Compared to the other six alternatives analyzed in the Draft SEIS/EIR, Alternative C (which includes Alignment 2C2) would have the highest emissions of ROG, NOx and PM<sub>10</sub>, based on length of the transmission line and access roads. (Draft SEIS/EIR, p. 4-9.) Moreover, by affecting land uses in the RUSP area, Alternative 2C2 could force additional growth westward, thereby creating more severe air quality impacts than would otherwise occur with the long-planned growth in the County's Future Study Area and in the RUSP area. One of the primary goals of SACOG's Blueprint Plan is to help the region to reduce overall air emissions given the same regional population growth because it is designed to decrease the length of vehicle trips and increase use of public transit. Development consistent with the Blueprint Plan will result in higher transit use than lower density development because Blueprint development provides higher residential densities in close proximity to transit hubs.

C.8-2

{00018686.DOC; 1}

**Comment Set C.8, cont.**

**Regional University Specific Plan (represented by Remy, Thomas, Moose, and Manley, LLP)**

Mr. Steve Tuggle

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2. Land Use

It appears from Figure 4.9-1 and Table 4.9-2 that no other alternative has near the potential land use impacts of Alternative 2C2, which will affect planned residential uses in the RUSP. Alignment 2C2 is located within or closely adjacent to the following plans/proposed developments: RUSP, Sierra Vista Specific Plan (“SVSP”), Creekview Specific Plan, West Roseville Specific Plan, and the Curry Creek Community Plan.

C.8-3

The status of the Placer Vineyards Specific Plan in Table 4.9-2 should be updated to reflect the project’s approval by the Placer County Board of Supervisors on July 16, 2007.

C.8-4

3. Noise

The Draft SEIS/EIR fails to recognize that the immediate adjacency of Alignment 2C2 to residential uses to the south of the alignment may result in significant noise impacts to those adjacent residential uses within the RUSP area.

C.8-5

4. Traffic

Alignment 2C2 could necessitate complete re-alignment of planned roadways in the SVSP and the RUSP, potentially affecting regional and sub-regional traffic and circulation in all of southwestern Placer County. This would constitute a significant but as-yet-unstudied adverse impact on the transportation network in southwestern Placer County. If this Alignment continues to be considered for possible approval, substantial additional analysis would be required before the Alignment legally could be approved, as recirculation of the environmental document would be necessary to disclose this additional analysis of the new adverse impact to the public.

C.8-6

An important objective of the RUSP project is to locate the university and community to be able to connect to the future regional transportation and infrastructure system (Watt Avenue, Pleasant Grove Boulevard, Base Line Road, and Placer Parkway at Watt Avenue). Alignment 2C2 could force re-alignment of these roadways and undermine both regional and sub-regional traffic and circulation plans.

5. Wetlands

As noted above, Alignment 2C2 would cause potentially significant adverse impacts to wetlands, resulting in significant mitigation costs to member agencies in the proposed project. (Draft SEIS/EIR, p. 4-111.) These costs could be avoided if Alignment 2C2 is rejected.

C.8-7

{00018686.DOC; 1}



**Comment Set C.8, cont.**

**Regional University Specific Plan (represented by Remy, Thomas, Moose, and Manley, LLP)**

Mr. Steve Tuggle

Aug. 27, 2007

Page 4

For all of the reasons stated above, the applicants of the RUSP respectfully request that Alignment 2C2 be eliminated from further consideration in the SEIS/EIR. If it is retained for further consideration, substantial additional analysis would be required before the environmental documentation could be considered legally adequate.

C.8-8

Very truly yours,



Megan M. Quinn

cc: Julie Hanson  
Marcus Lo Duca

{00018686.DOC; 1}

**Comment Set C.9**  
**Richland Planned Communities, Inc.**



August 30, 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
114 Parkshore Drive  
Folsom, CA 95630

**RE: Sacramento Area Voltage Support Draft Supplemental Environmental Impact Statement (SEIS) and Environmental Impact Report (EIR);  
DOE-0323S1 / SCH# 2006052119**

Dear Mr. Tuggle:

Richland Planned Communities, Inc. represents Warm Springs Investments, Ltd., owners of approximately 419 acres located at the northeast corner of State Highway 99 and Elkhorn Boulevard in the County of Sacramento, California. We are writing to comment on the Sacramento Area Voltage Support Draft Supplemental Environmental Impact Statement (SEIS) and Environmental Impact Report (EIR). We understand that the subject documents analyze the environmental effects of the Sacramento Municipal Utility District (SMUD) and Western Area Power Administration (Western) proposed construction and operation of approximately 31 to 38 miles of new, double circuit, 230-kilovolt (kV) transmission line between Western's O'Banion Substation and the area just south of SMUD's Elverta Substation and the reconstruction of SMUD's existing 230-kV/115-kV transmission line between SMUD's Elverta and Natomas substations. Our property is directly affected by the proposed alignment of the Segment 2A4 on the north side of Elkhorn Boulevard east of State Highway 99 as presented in the subject SEIS / EIR.

We believe that the alignment of Segment 2A4 is not the environmentally superior alternative for Segment 2A for the following reasons.

1. Visual Resources – The Segment 2A4 alternative is located directly north of a significant amount of existing residential homes. Construction of a 230 kV transmission line with 125-foot tall monopoles would result in visual impacts for the existing residents in this area. A more reasonable solution is to select an alternative alignment of Segment 2A further to the north away from these existing residents. The planning of future development would then be able to include this alternative alignment as an existing constraint, thus allowing land planning efforts to better incorporate this regional utility facility.
2. Noise – Construction noise associated with constructing the 230 kV transmission line will impact the existing residents located directly south of alignment 2A4. A more reasonable solution is to select an alternative alignment of Segment 2A further to the north, away from these existing residents, thus resulting in less construction impacts to existing land uses.

C.9-1

C.9-2

**Comment Set C.9, cont.  
Richland Planned Communities, Inc.**

- 3. Air Quality – Dust and vehicle emissions generated during construction of the 230 kV transmission line will impact existing residents directly south of alignment 2A4. A more reasonable solution is to select an alternative alignment of Segment 2A further to the north, away from these existing residents, thus resulting in less air quality impacts to existing land uses. C.9-3
- 4. Traffic and Transportation – It is stated in the subject document that the widening of Elkhorn Blvd to four lanes from Rio Linda Blvd to SR 99 is a planned transportation project for 2010 in the Segment 2A4 area. Construction traffic and the movement of heavy equipment on Elkhorn Blvd during construction of the proposed facility would potentially interfere with the planned widening of Elkhorn Blvd. A more reasonable solution is to select an alternative alignment of Segment 2A further to the north that would not interfere with transportation projects planned during construction of the 230 kV transmission line, resulting in less impacts on the local transportation network. C.9-4
- 5. Land Use – The proposed alignment of Segment 2A4 includes curving the 230 kV transmission line to the north of and around existing land uses (Natomas Mutual Water Company facilities) located on the north side of Elkhorn Blvd approximately ½ mile east of SR 99. This results in an impact on this existing land use as the facility would separate, or create a barrier between, this existing land use from future unplanned land uses. A more reasonable solution is to select an alternative alignment of Segment 2A further to the north that results in a more efficient use of the proposed right of way and less conflicts with existing land uses. C.9-5

Any one of the four alternative Segment 2A alignments to the north of Segment 2A4 would avoid the potential impacts described above. Moreover, with the exception of the potential impacts noted above that are specifically associated with the Segment 2A4 alignment, all of the Segment 2A alignments have otherwise comparable environmental impacts. For these reasons, the four Segment 2A alignment alternatives to the north of Segment 2A4 are environmentally superior alternatives to the Segment 2A4 alignment and the environmental documents should be revised to reflect this conclusion. C.9-6

Sincerely,



Todd Chambers  
Richland Planned Communities, Inc.

Cc: Steve Thurtle, Richland Planned Communities, Inc.  
Don Troppmann, Richland Planned Communities, Inc.

**Comment Set C.10**  
**Sierra Vista Specific Plan**  
**(represented by Remy, Thomas, Moose, and Manley, LLP)**

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August 27, 2007

Mr. Steve Tuggle  
Natural Resources Manager  
Western Area Power Administration, Sierra Nevada Region  
114 Parkshore Drive  
Folsom, California 95630-4710

Re: Draft Supplemental Environmental Impact Statement and Environmental Impact Report (“SEIS/EIR”) for the Sacramento Area Voltage Support Transmission Project

Dear Mr. Tuggle:

These comments are submitted on behalf of a group of property owners who own roughly 2,170 acres in the southern portion of the City of Roseville’s adopted sphere of influence, which area is commonly known as the proposed Sierra Vista Specific Plan (“SVSP”). While generally supportive of municipal utilities and their efforts to provide adequate infrastructure to meet the region’s growing electricity needs, the SVSP owners’ group objects to the inclusion of Alternative 2C2 in the above referenced SEIS/EIR, and requests deletion of Alternative 2C2 from further consideration in the SEIS/EIR.

Alternative 2C2 traverses an area that has been designated by local planning agencies for urban development since 1994. Specifically, Alternative 2C2 bisects an area projected for urban development in the 1994 Placer County General Plan, as part of the Future Study Area west of Fiddymont Road, north of Baseline Road, and south of Pleasant Grove Creek all the way to the County line. Since 1997, both Placer County and the City of Roseville have anticipated urban development of the eastern portion of the Future Study Area as part of a memorandum of understanding (“MOU”) between the two agencies, which agreement foresaw future development of that area either as a future annexation to the City or as part of a new planning area in unincorporated Placer County.

C.10-1

{00018502.DOC; 1}

**Comment Set C.10, cont.**  
**Sierra Vista Specific Plan**  
**(represented by Remy, Thomas, Moose, and Manley, LLP)**

Mr. Steve Tuggle  
 August 27, 2007  
 Page 2

In 2004, the City of Roseville approved a roughly 3,100-acre specific plan, the West Roseville Specific Plan (“WRSP”), in the northern portion of the MOU area, immediately adjacent to the SVSP area. Later that year, the Placer County Local Agency Formation Commission (“Placer LAFCO”) approved the annexation of the WRSP to Roseville, and expansion of the City’s sphere of influence to encompass the remainder of the MOU area, which includes nearly all of the proposed SVSP. The SVSP and the entire MOU area are also contained in the Sacramento Area Council of Governments’ (“SACOG’s”) “Blueprint Preferred Scenario,” and land uses have been assumed for the MOU area in the certified EIR for the WRSP. The preliminary land plan for the SVSP, a copy of which is enclosed, is consistent with SACOG Blueprint Planning Principles, and contains vital east-west and north-south transportation links that will serve all of southwest Placer County.

C.10-1, cont.

Alternative Alignment 2C2 threatens the future urbanization of the City of Roseville’s adopted sphere of influence, implementation of the SACOG Blueprint project in western Placer County, and undermines the last decade’s worth of land use planning for this portion of Placer County. As can be seen from the enclosed land use plan, Alignment 2C2 threatens not only the SVSP in the southern portion of the City’s MOU area, but also the City’s existing Reason Farms environmental preserve and the existing wetland preserve in the WRSP.

A review of the Draft SEIS/EIR compared to these existing and future urban land uses indicates significant adverse environmental impacts in a broad range of impact areas. A brief summary of such impacts follows:

1. Air Quality

Compared to the other six alternatives analyzed in the Draft SEIS/EIR, Alternative C (which includes Alignment 2C2) would have the highest emissions of ROG, NO<sub>x</sub> and PM<sub>10</sub>, based on length of the transmission line and access roads. (Draft SEIS/EIR, p. 4-9.) Moreover, by severely affecting land uses in the SVSP area, Alternative 2C2 could force additional growth westward, thereby creating more severe air quality impacts than would otherwise occur with the long-planned growth in the MOU area, including the SVSP area. One of the primary goals of SACOG’s Blueprint Plan is to help the region to reduce overall air emissions given the same regional population growth because it is designed to decrease the length of vehicle trips and increase use of public transit. Development consistent with the Blueprint Plan will result in higher transit use than lower density development because Blueprint development provides higher residential densities in close proximity to transit hubs.

C.10-2

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**Comment Set C.10, cont.  
Sierra Vista Specific Plan  
(represented by Remy, Thomas, Moose, and Manley, LLP)**

Mr. Steve Tuggle  
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Page 3

2. Biological Resources

In this impact area alone, Alternative Alignment 2C2 will have significant adverse environmental effects that should compel the project applicant to withdraw this alternative. Specifically, Alignment 2C2 will have significant and unavoidable adverse impacts on biological resources within: (1) the Reason Farms Environmental Preserve, (2) the WRSP Open Space Preserve, and (3) the wetlands at the far northwest corner of the SVSP. (See Draft SEIS/EIR, pp. 4-17 to 4-18.) The WRSP Open Space Preserve consists of several habitat types, including non-native grasslands, vernal pools, and riparian/oak woodland corridors. At MP 5.5, the entire ROW consists of non-native grasslands with isolated vernal pools and seasonal wetlands, including a high density of vernal pools just before the alignment intersects the existing transmission line. The vernal pools provide suitable habitat for vernal pool fairy shrimp and California linderiella. (Draft SEIS/EIR, p. 4-18.)

C.10-3

The significant and unavoidable adverse biological impacts of Alignment 2C2 alone justify the rejection of Alignment 2C2 from further consideration.

3. Land Use

The boundaries of the SVSP are incorrectly identified in Figure 4.9-3 of the Draft SEIS/EIR. The SVSP actually extends an additional 250 feet west of the western boundary shown in Figure 4.9-3. As such, Alternative 2C2 would actually pass through the SVSP, rather than adjacent to it, as shown in Figure 4.9-3. As a result of the Draft SEIS/EIR's failure to accurately identify the boundaries of the SVSP, the Draft SEIS/EIR fails to adequately analyze the project's impacts on the SVSP. The document must, therefore, be substantially revised before it is legally adequate.

C.10-4

It appears from Figure 4.9-1 and Table 4.9-2 that no other alternative has near the potential land use impacts of Alternative 2C2, which will also affect planned residential uses in the Regional University Specific Plan ("RUSP") area proposed in unincorporated Placer County adjacent to the WRSP. (Draft SEIS/EIR, pp. 4-59 to 4-62.) Alignment 2C2 is located within or closely adjacent to the following plans/proposed developments: RUSP, SVSP, Creekview Specific Plan, West Roseville Specific Plan, and the Curry Creek Community Plan.

C.10-5

Further, Alternative C, which includes Alignment 2C2, would traverse the western boundary of the City of Roseville's sphere of influence. A goal of the City of Roseville's General Plan is to preserve visual quality along the City's western boundary; transmission lines could substantially defeat this goal. (Draft SEIS/EIR, p. 4-57.)

C.10-6

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**Comment Set C.10, cont.**  
**Sierra Vista Specific Plan**  
**(represented by Remy, Thomas, Moose, and Manley, LLP)**

Mr. Steve Tuggle  
 August 27, 2007  
 Page 4

The status of the Placer Vineyards Specific Plan in Table 4.9-2 should be updated to reflect the project's approval by the Placer County Board of Supervisors on July 16, 2007. C.10-7

4. Noise

The Draft SEIS/EIR fails to recognize that the immediate adjacency of Alignment 2C2 to residential uses to the east and west of the north-south portion of the alignment would result in significant noise impacts to those adjacent residential uses, including high density residential uses planned along the future northerly extension of Watt Avenue in the SVSP, as promoted by the SACOG Blueprint project. C.10-8

5. Traffic

Alignment 2C2 could necessitate complete re-alignment of planned roadways in the SVSP and the RUSP, potentially affecting regional and sub-regional traffic and circulation in all of southwestern Placer County. This would constitute a significant but as-yet-unstudied adverse impact on the transportation network in southwestern Placer County. If this Alignment continues to be considered for possible approval, substantial additional analysis would be required before the Alignment legally could be approved, as recirculation of the environmental document would be necessary to disclose this additional analysis of the new adverse impact to the public. C.10-9

6. Visual Resources

Alignment 2C2 would construct a new transmission line located adjacent to West Roseville Preserve that is part of the City of Roseville's western boundary. The City of Roseville General Plan Growth Management Element contains a visual quality policy goal for new development west of Fiddyment Road to be consistent with the City's desire to establish view preservation corridors that provide an aesthetic and recreational resource for residents along the western boundary of the City. The policy states that growth should be managed in such a way to ensure that significant open-space areas will be preserved (Roseville 2004b). Under Roseville's interpretation, the placement of a new transmission line located immediately adjacent and parallel to the City of Roseville's western boundary conflicts with its visual quality policy. (Draft SEIS/EIR, pp. 4-99 to 4-100.) C.10-10

7. Wetlands

As noted above, Alignment 2C2 would cause potentially significant adverse impacts to wetlands, resulting in significant mitigation costs to member agencies in the proposed project. (Draft SEIS/EIR, p. 4-111.) These costs could be avoided if Alignment 2C2 is rejected. C.10-11

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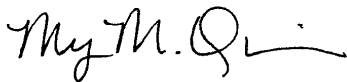
**Comment Set C.10, cont.**  
**Sierra Vista Specific Plan**  
**(represented by Remy, Thomas, Moose, and Manley, LLP)**

Mr. Steve Tuggle  
August 27, 2007  
Page 5

For all of the reasons stated above, the SVSP owners' group respectfully requests that Alignment 2C2 be eliminated from further consideration in the SEIS/EIR. If it is retained for further consideration, substantial additional analysis would be required before the environmental documentation could be considered legally adequate.

C.10-12

Very truly yours,



Megan M. Quinn

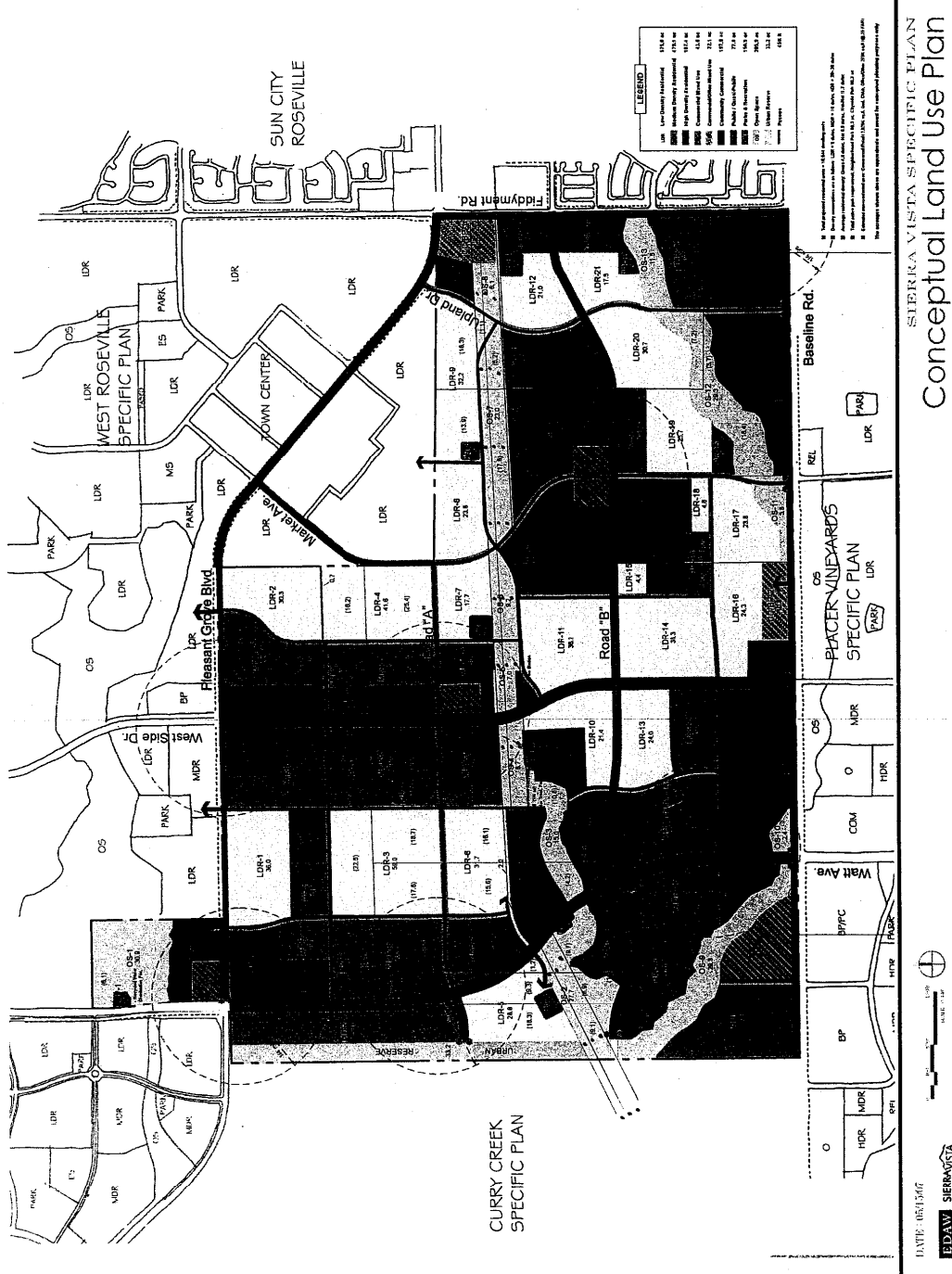
Enclosure

cc: SVSP Owners Group  
Marcus Lo Duca  
Kathy Pease, City of Roseville

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**Comment Set C.10, cont.  
Sierra Vista Specific Plan  
(represented by Remy, Thomas, Moose, and Manley, LLP)**



**Comment Set C.10, cont.  
Sierra Vista Specific Plan  
(represented by Remy, Thomas, Moose, and Manley, LLP)**

5/15/2007

Parcel ID	Area*	Density Assumption (units/acre)	Residential Percentage**	Number of Units	Unit Types***
HDR-1	15.5	20	100%	310	
HDR-2	10.0	20	100%	200	Examples: - Courtyard townhomes/condos
HDR-3	15.6	20	100%	312	- Garden style apartments
HDR-4	10.5	20	100%	210	- Podium design apartments/condos
HDR-5	13.2	20	100%	264	
HDR-6	6.7	20	100%	134	
HDR-7	10.8	20	100%	216	
HDR-8	25.1	30	100%	753	
<b>SUMMARY (HDR)</b>	<b>107.4</b>	<b>20-30</b>	<b>100%</b>	<b>2339</b>	<b>Attached</b>
CMU-1	5.4	20	60%	64	
CMU-2	6.0	20	50%	60	
CMU-3	5.0	20	50%	50	Examples: - Horizontal / vertical mixed use
CMU-4	5.0	20	50%	50	
CMU-5	21.6	20	60%	259	
<b>SUMMARY (CMU)</b>	<b>43.0</b>	<b>20</b>	<b>50-60%</b>	<b>483</b>	<b>Attached</b>
<b>TOTAL</b>	<b>1204.3</b>			<b>10544</b>	

\* The averages are approximate and meant for conceptual planning purposes only  
 \*\* For CMU parcels, the residential percentages are assumptions only and subject to change  
 \*\*\* Largely undetermined at this point. May include, but not limited to, dwelling types shown in this column

■ Total detached units: 7662 Total attached units: 2882 (Assumes 100% detached for MDR parcels)  
 ■ Average residential density: Gross 4.8 du/ac, Net: 8.8 du/ac, Net-Acc: 11.7 du/ac

SIERRA VISTA RESIDENTIAL BREAKDOWN BY SCHOOL DISTRICT

Unit Type	Roseville School District (dwelling units)	Center School District (dwelling units)
LDR	836	2,045
MDR****	1,169	3,622
HDR	522	1,877
CMU	483	483
<b>TOTAL</b>	<b>2,517</b>	<b>8,027</b>
		5,697 Detached
		2,360 Attached

\*\*\*\* Assumes 100% detached for MDR parcels

Prepared by EDW/lec

SIERRA VISTA RESIDENTIAL BREAKDOWN BY PARCEL

Parcel ID	Area*	Density Assumption (units/acre)	Residential Percentage**	Number of Units	Unit Types***
LDR-1	36.0	5	100%	180	
LDR-2	30.3	5	100%	151	
LDR-3	59.0	5	100%	295	
LDR-4	41.6	5	100%	208	
LDR-5	28.8	5	100%	144	
LDR-6	31.7	5	100%	158	
LDR-7	17.7	5	100%	88	
LDR-8	23.8	5	100%	119	
LDR-9	32.2	5	100%	161	Examples: - Standard lot SFD (4,500-6,000 sq.ft. typical) - May include larger SFD lots over 10,000 sq.ft.
LDR-10	21.4	5	100%	107	
LDR-11	38.2	5	100%	191	
LDR-12	21.0	5	100%	105	
LDR-13	24.0	5	100%	120	
LDR-14	38.3	5	100%	191	
LDR-15	4.4	5	100%	22	
LDR-16	24.3	5	100%	121	
LDR-17	23.8	5	100%	119	
LDR-18	4.6	5	100%	23	
LDR-19	25.7	5	100%	128	
LDR-20	30.7	5	100%	153	
LDR-21	17.5	5	100%	87	
<b>SUMMARY (LDR)</b>	<b>575.0</b>	<b>5</b>	<b>100%</b>	<b>2871</b>	<b>Detached</b>
MDR-1	9.7	10	100%	97	
MDR-2	27.6	10	100%	276	
MDR-3	26.2	10	100%	262	
MDR-4	39.0	10	100%	390	
MDR-5	36.4	10	100%	364	
MDR-6	40.6	10	100%	406	
MDR-7	26.5	10	100%	265	Examples: - Small lot detached housing (< 50 ft. width lots) - Detached cluster housing - Zero lot line / Zipper lot housing - Dual housing - Detached townhomes
MDR-8	19.2	10	100%	192	
MDR-9	20.0	10	100%	200	
MDR-10	11.9	10	100%	119	
MDR-11	18.8	10	100%	188	
MDR-12	19.7	10	100%	197	
MDR-13	52.0	10	100%	520	
MDR-14	9.0	10	100%	90	
MDR-15	24.7	10	100%	247	
MDR-16	37.5	10	100%	375	
MDR-17	19.1	10	100%	191	
MDR-18	13.1	10	100%	131	
MDR-19	12.4	10	100%	124	
MDR-20	18.7	10	100%	187	
<b>SUMMARY (MDR)</b>	<b>479.1</b>	<b>10</b>	<b>100%</b>	<b>4791</b>	<b>Detached</b>

**Comment Set C.10, cont.  
Sierra Vista Specific Plan  
(represented by Remy, Thomas, Moose, and Manley, LLP)**

SIERRA VISTA NON-RESIDENTIAL BREAKDOWN BY PARCEL										5/15/2007
Parcel ID	Area**	Category/Type	Retail Percentage	Retail Acreage	Retail FAR**	Retail sq.ft	Office/Other*** Percentage	Office/Other Acreage	Office/Other FAR	Office/Other sq.ft
PR-1	10.0	Neighborhood Park	40%	2.2	0.27	25,404	0%	0.0	0.35	0
PR-2	7.0	Neighborhood Park	20%	1.2	0.4	20,969	30%	1.8	0.35	27,443
PR-3	3.0	Neighborhood Park	20%	1.0	0.4	17,424	30%	1.5	0.35	22,889
PR-4	3.0	Neighborhood Park	20%	1.0	0.4	17,424	30%	1.5	0.35	22,889
PR-5	3.0	Neighborhood Park	40%	8.6	0.23	86,582	0%	0.0	0.35	0
PR-6	3.0	Neighborhood Park		14.0		167,223		4.8		73,181
PR-7	3.0	Neighborhood Park	100%	18.0	0.27	211,702				
PR-8	2.0	Neighborhood Park	100%	12.0	0.27	141,124				
PR-9	5.8	Neighborhood Park	100%	5.0	0.27	58,886				
PR-10	12.2	Neighborhood Park	0%	0.0						
PR-11	8.2	Neighborhood Park	100%	0.8	0.23	8,015				
PR-12	3.0	Neighborhood Park	100%	56.1	0.22	528,024				
PR-13	3.0	Neighborhood Park	100%	7.5	0.23	75,141				
PR-14	8.0	Neighborhood Park	100%	41.1	0.22	393,870				
PR-15	4.7	Neighborhood Park	100%	36.8	0.22	352,882				
PR-16	2.0	Neighborhood Park		176.3		1,789,364				
SUBTOTAL	80.9									
PR-17	40.0	Citywide Park	40%	4.5	0.23	45,285	60%	6.8	0.35	102,368
PR-18	30.0	Citywide Park	40%	4.3	0.23	43,281	60%	6.5	0.35	99,794
SUBTOTAL	70.0			8.8		88,566	13.3			202,162
TOTAL	283.0			199.1		2,029,653	18.1			275,343

\*\* This acreage is approximate and meant for conceptual planning purposes only  
 \*\*\* Per EIPs retail analysis  
 \*\*\* "Other" refers to community facilities or civic/institutional uses such as a church, fire/police station etc. (only applies to CMU)  
 The retail, office percentages shown above are assumptions and subject to change

Prepared by ED&W Inc

SIERRA VISTA PARKS, OPEN SPACE, & POP BREAKDOWN BY PARCEL										5/15/2007
Parcel ID	Area**	Category/Type	Retail Percentage	Retail Acreage	Retail FAR**	Retail sq.ft	Office/Other*** Percentage	Office/Other Acreage	Office/Other FAR	Office/Other sq.ft
POP-1	1.5	Recycled Water Distribution Facility								
POP-2	10.0	Elementary School (Rosabelle School District)								
POP-3	0.3	1/4 ac Well Site (Not a Part of Neighborhood Park)								
POP-4	1.2	Electric Substation								
POP-5	3.8	Includes 3 ac Water Treatment Facility, 1/4 ac Solid Waste Recycling, & 1/4 ac Well Site								
POP-6	3.0	Fire Station (1 ac under powerline easement)								
POP-7	12.0	Elementary School (Center School District)								
POP-8	21.6	Middle School (Center School District)								
POP-9	12.0	Elementary School (Center School District)								
POP-10	12.0	Elementary School (Center School District)								
POP-11	0.3	1/4 ac Well Site (Not a Part of Neighborhood Park)								
SUBTOTAL	205.9									
OS-1	27.7	Drainage Corridor & Powerline Easement								
OS-2	15.0	Drainage Corridor								
OS-3	8.7	Drainage Corridor & Powerline Easement								
OS-4	7.0	Powerline Easement								
OS-5	9.2	Powerline Easement								
OS-6	23.0	Powerline Easement								
OS-7	6.1	Powerline Easement								
OS-8	29.3	Drainage Corridor								
OS-9	2.4	Drainage Corridor								
OS-10	5.8	Drainage Corridor								
OS-11	29.3	Drainage Corridor								
OS-12	11.5	Drainage Corridor								
OS-13		Drainage Corridor								
SUBTOTAL	205.9									
PR-17	40.0	Citywide Park								
PR-18	30.0	Citywide Park								
SUBTOTAL	70.0									
TOTAL**	484.4									

\*\* The acreage are approximate and meant for conceptual planning purposes only  
 \*\*\* Does not include linear parks

**Comment Set C.10, cont.  
Sierra Vista Specific Plan  
(represented by Remy, Thomas, Moose, and Manley, LLP)**

**SIERRA VISTA LAND USE SUMMARY BY CITY REVIEW DATE**

City Review Date	Gross Acreage	LDR Acreage	MDR Acreage	HDR Acreage	Residential Units (incl. CMU)	Commercial (Ac)	Residential Density (Du/Ac)	Office (Ac)	CMU (Ac)	CCBPR (Ac)	Commercial(Ref)/Office sq.ft.**	School (Ac)	PIQP*** (Ac)	Park (Ac)	Linear Park (Ft.)	Urban Reserve (Ac)	Open Space (Ac)
09/27/05	1986	453.9	489.7	160.0	10529	69.3	Gro: 5.5, Net: 3.9, Net-Net: 13.2	55.4	56.2		Com: 603K sq.ft., Off: 724K sq.ft.	68.0	29.3	162.1	14030		222.4
12/06/05	1986	421.5	540.5	123.2	10617	77.3	Gro: 5.3, Net: 3.9, Net-Net: 13.0	56.6	64.0		Com: 675K sq.ft., Off: 742K sq.ft.	68.0	2.0	162.0	12285		235.6
02/16/06	2164	496.0	608.8	75.4	11061	72.0	Gro: 5.1, Net: 3.0, Net-Net: 12.0		119.3		Com: 1,194K sq.ft., Off: 388K sq.ft.	67.6	2.0	175.9	12149	31.4	258.9
04/18/06	2160	543.6	587.5	81.1	10756	97.9	Gro: 5.0, Net: 3.5, Net-Net: 11.4	49.3	49.3	37.2	Com: 1,323K sq.ft., Off: 438K sq.ft.	67.6	21.7	123.1	19735	32.3	265.0
06/13/06	2160	588.9	567.9	79.7	10610	102.1	Gro: 4.9, Net: 3.5, Net-Net: 11.4	44.3	44.3	37.2	Com: 1,380K sq.ft., Off: 413K sq.ft.	67.6	34.4	162.0	18879	32.3	235.4
07/17/06	2160	596.5	571.1	79.7	10590	102.1	Gro: 4.9, Net: 3.5, Net-Net: 11.3	44.3	44.3	37.2	Com: 1,380K sq.ft., Off: 413K sq.ft.	67.6	31.9	150.8	23952	32.3	241.8
09/09/06	2160	588.3	522.4	82.3	10194	174.3	Gro: 4.7, Net: 3.4, Net-Net: 11.2	44.3	44.3	7.5	Com: 1,988K sq.ft., Off: 142K sq.ft.	67.6	16.1	148.5	25152	32.3	247.8
11/09/06	2180	553.9	517.3	84.0	10320	188.6	Gro: 4.8, Net: 3.6, Net-Net: 11.5	44.3	23.8		Com: 2,008K sq.ft., Off: 308K sq.ft.	67.6	10.0	148.5	25152	32.3	246.1
05/15/07	21768	575.0	479.1	107.4	10544	197.9	Gro: 4.8, Net: 3.8, Net-Net: 11.7	43.0	22.1		Com: 2,025K sq.ft., Off: 275K sq.ft.	67.6	10.0	150.9	46079	33.2	205.9

\* CMU assumptions vary with each submittal  
 \*\* FAR assumptions vary with each submittal  
 \*\*\* Does not include schools (shown on a separate column)

■ The calculation shown above is approximate and is meant for conceptual planning purposes only.

Prepared by EDAM, Inc.

**Comment Set C.11**  
**The Yekun Lim & Inok Lim Revocable Trust**

**THE YEKUN LIM & INOK LIM REVOCABLE TRUST**

August 7, 2007

**SVS-EIS@wapa.gov**

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVS Comments**

Dear Mr. Tuggle:

I am writing this letter on behalf of The Yekun Lim and Inok Lim Revocable Trust, which owns an undivided portion of 306 acres bordering Elverta Road and SR 70/99 in Sacramento County. The Assessor's Parcel No. is 201-0120-035.

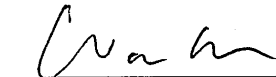
WAPA Alternatives 2A3, 2A4 and 2A5 severely impact this property. Alternatives 2A3, 2A4 and 2A5 come down the east side of the property along SR 99 and will visually intrude as well as limit developable acreage.

WAPA Alternative 2A5 goes east through the middle of the property and completely bisects it, thereby limiting access and creating visual intrusions throughout all the property.

We strongly object to alternatives which (1) bisect the property as does Alternative 2A5, (2) place a visual intrusion along the boundaries of the property as do Alternatives 2A3, 2A4 and 2A5, (3) limit access to the property (Alternative 2A3) and (4) interfere with future infrastructure and locating schools (all alternatives).

Please select an alternative with fewer impacts on development or farming, such as Alternative 2B.

Very truly yours,



WARREN CHANG

C.11-1

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**Comment Set I.1**  
**Individual Commenter I.1**

(2/26/2008) SVS-SEIS - WAPA EIS letter.pdf

Page

Law Offices of  
**GEORGE E. PHILLIPS**

2306 Garfield Avenue  
Carmichael, California 95608  
Telephone (916) 979-4800  
Telefax (916) 979-4801

August 24, 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
114 Parkshore Drive  
Folsom, CA 95630

**Re: Sacramento Area Voltage Support Draft Supplemental EIR/EIS**

Dear Mr. Tuggle,

This office represents Ms. Joan Allen and Ms. Sharon Musto, and on behalf of our clients we submit these comments on the Sacramento Area Voltage Support Draft Supplemental EIR/EIS ("SEIS/SEIR"). Our clients are the owners of property in unincorporated Placer County located south of Phillip Road, east of Brewer Road and west of Country Acres Lane (APN 017-090-030), as shown on the attached exhibit. This property is approximately 216 acres, and has been historically used for rice cultivation by the Allen family for many years. The property is currently subject to a Williamson Act contract, which creates an agricultural preserve and prohibits development or use of the property for non-agricultural purposes. Of particular concern to our clients is the proposed alternative alignment 2C<sub>2</sub>, which would be aligned with the southern boundary of their property.

The requirement to analyze a series of project alternatives to satisfy NEPA and CEQA requirements is recognized, and the efforts of WAPA and SMUD to identify seven alternative routes for Segment 2 is appreciated. However, we have serious concerns regarding the approach toward identifying an "environmentally superior alternative" in the SEIS/SEIR. Page 3-1 indicates that "Western and SMUD will consider public comments to the Draft SEIS and EIR to make a decision on the preferred alternative. The preferred alternative and the environmentally superior alternative will be identified in the Final SEIS and EIR."

The identification of the environmentally superior alternative cannot be deferred until after the public review process is completed. It must be disclosed now. CEQA Guidelines §§ 15126.6(a) and (e)(2) require a Draft EIR to explicitly identify the environmentally superior alternative. If the "no-project alternative" is the environmentally superior alternative, as is the case here, an EIR must also

I.1-1

**Comment Set I.1, cont.  
Individual Commenter I.1**

(2/26/2008) SVS-SEIS - WAPA EIS letter.pdf

Page

identify an environmentally superior alternative from among the remaining alternatives. Table 3-4 of the SEIS/SEIR presents a summary comparison of the various Segment 2 alternatives, but the SEIS/SEIR does not contain a conclusion as to which alternative among those analyzed is the environmentally superior alternative. In this respect, the SEIS/SEIS fails to comply with CEQA requirements. Since the SEIS/SEIR is intended as a combined document to satisfy both NEPA and CEQA requirements (See *Public Resources Code* §21083.5(a) and *CEQA Guidelines* §15221), the document must satisfy the stricter CEQA requirements.<sup>1</sup>

I.1-1, cont.

Though not defined as such by the SEIS/SEIR, it is evident from the analysis that Alternative 2C is not the environmentally superior or preferable alternative, particularly as it relates to impacts on agricultural land and resources. Unlike Alternatives 2A and 2B, Alternative 2C (and in particular, segment 2C<sub>2</sub>), would infringe upon significant areas of land under Williamson Act contracts. Since contracted parcels cannot as a matter of law be put to viable use for other than agricultural purposes, heightened regard for impacts to agricultural uses should be given where contracted parcels are affected.

I.1-2

As described in the SEIS/SEIR, the project involves the construction of double circuit 230 kV transmission lines on 125-foot monopole towers. These structures and connecting powerlines will prevent all manner of aerial spraying (crop-dusting) on adjacent agricultural land. The SEIS/SEIR gives a nod to potential safety concerns associated with crop-dusting flights adjacent to powerline facilities (p.4-72), but then concludes that "to minimize these impacts, surface application techniques could be used near transmission lines and structures." While surface application would minimize potential impacts to crop-dusting pilots, there is no discussion of the impacts to agricultural operations from the elimination of the only cost-effective means of applying pesticides or fertilizers to large areas of cropland. Agricultural production in California is threatened by a combination of factors including low commodity prices as well as increasing labor, water, and other production costs. The elimination of aerial spraying on adjacent parcels such as the Allen property will make it infeasible to conduct viable farming operations, due to the increased cost associated with ground application as well as the inability to compete in the market with other growers that are not burdened in this way. As stated above, the Williamson Act contracts on the Allen property and other parcels along the alignment of Alternative 2C<sub>2</sub> prohibit use of this land for purposes other than agriculture. Accordingly, priority

I.1-3

I.1-4

<sup>1</sup> NEPA's requirements for identification of an "environmentally superior alternative are recognized as being less rigorous than the requirements of CEQA in this regard. The Council on Environmental Quality *Regulations for Implementing NEPA*, Section 1502.14, *Alternatives Including the Proposed Project*, specifies the following: "This section is the heart of the environmental impact statement ... [this section] should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public." [emphasis added]. Without identification of an environmentally superior alternative there lacks a clear basis for choice among alternative options as environmental impacts are concerned.



**Comment Set I.1, cont.**  
**Individual Commenter I.1**

(2/26/2008) SVS-SEIS - WAPA EIS letter.pdf

Page

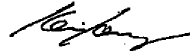
in the decision making process must be given to protecting the viability of agricultural operations on lands where no other use is permitted.

As indicated by the SEIS/SEIR, WAPA and SMUD have not identified a "preferred alternative" alignment for Segment 2, which indicates generally that each of the seven alternatives would satisfy the purpose and need of the project at a technical level. With this in the case, the selection of a preferred alternative should be driven by environmental concerns, including potential impacts on agricultural resources and operations. It appears that Alternative 2B would be the preferable alternative from an impact standpoint. As opposed to Alternative 2C, Alternative 2B follows the alignment of an existing railroad line, and crosses land primarily used for pasturing or non-native grassland uses that would not be significantly impacted by the powerline project. Alternative 2B would also require the shortest distance of alignment, at 31.3 miles versus 37.6 miles for Alternative 2C.

Page 3-18 of the SEIS indicates that the project would require a 100-125 foot right-of-way (ROW)<sup>2</sup> along the transmission line route, with the exception of where existing right-of-way can be utilized. On the Allen property frontage, a 125' ROW for alignment 2C<sub>2</sub> would consume approximately 13 acres of agricultural land. Given the severe constraints that the power line project would create on the Allen parcel as a whole, and particularly within the ROW area, our clients do not believe that acquisition of an easement by WAPA (as indicated by the SEIS/SEIR) would be adequate in this instance. In the event that WAPA elects to pursue Segment 2C rather than another alternative, our clients would require that WAPA acquire the ROW area in fee title, and pay compensation for severance damages to the remainder of the Allen parcel associated with the reduction in value and use potential caused by the project.

On behalf of our clients, we appreciate the opportunity to provide comment on the SEIS/SEIR, and to participate in the planning process for this project.

Very truly yours,



Kevin Kemper

I.1-4, cont.

I.1-5

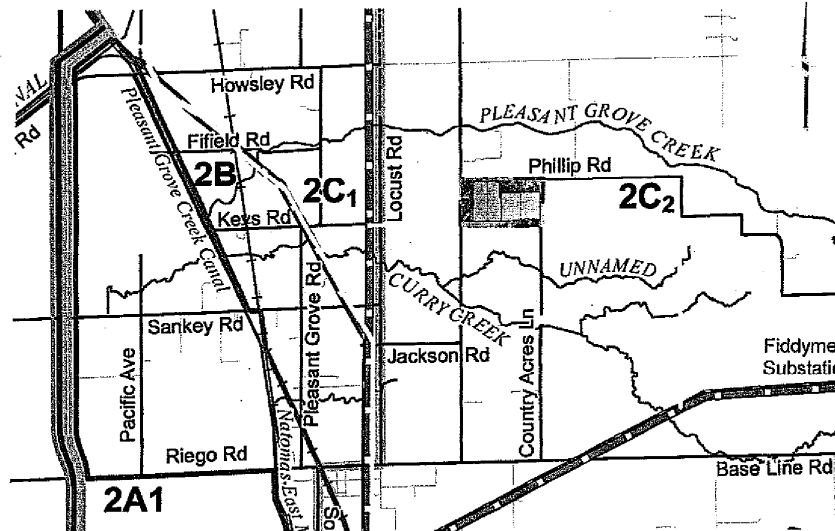
I.1-6

<sup>2</sup> The SEIS/SEIR acknowledges that State of California standards for school sites define a setback requirement of 150 feet from the edge of the power line ROW for 230kV facilities. As described above, the Allen parcel is restricted to agricultural use by the Williamson Act (as well as County land use regulations). Nevertheless, we remain cognizant of the impacts of this setback requirement on the future development potential of this property, which extends beyond the ROW WAPA has indicated it would acquire for this project.

**Comment Set I.1, cont.**  
**Individual Commenter I.1**

(2/26/2008) SVS-SEIS - Allen\_Property.pdf

Page



**ALLEN PROPERTY**

**Mackay & Somps**  
CIVIL ENGINEERS, INC.  
ROSEVILLE, CALIFORNIA (916) 793-1199

**Comment Set I.2**  
**Individual Commenter I.2**

THE LAW OFFICES OF  
**MARK J. REICHEL**  
ATTORNEY AT LAW  
555 CAPITOL MALL, 6<sup>TH</sup> FLOOR, SUITE 600  
SACRAMENTO, CALIFORNIA 95814

TELEPHONE (916) 498-9258  
FACSIMILE (916) 441-6553

[MARK@REICHELAW.COM](mailto:MARK@REICHELAW.COM)

July 18 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Manager  
114 Parkshore Drive  
Folsom, CA 95630

Re: Trudy Bianchi  
Property at 8391 Pleasant Grove Rd  
Elverta, CA 95626

Dear Mr. Tuggle:

Please be advised that I represent Ms. Bianchi, who owns 140 plus acres on Pleasant Grove Rd.

I.2-1

She received, via federal express, an "Interested Party" letter from you this morning, along with a Draft SEIS and EIR. I left you a voice mail earlier today in this regard.

Please contact me at your earliest convenience so that I can speak with you in regard to this matter.

Sincerely,



MARK J. REICHEL  
Attorney at Law

cc: Trudy Bianchi

**Comment Set I.3**  
**Individual Commenter I.3**

Melvin Borgman  
3559 Howsley  
Pleasant Grove, CA 95668

August 26, 2007

Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710  
Attention: Steve Tuggle, Natural Resources Manager

Subject: Sacramento Area Voltage Support Project

Ladies and Gentlemen:

As a resident of South Sutter County, I oppose continued encroachment on our resources, particularly from outside sources having no interest in the welfare of South Sutter County. If this Sacramento Area Voltage Support Project must go forward, the segment 2 "Alternative B" route should be selected since it would be of less negative impact in the South Sutter County Area.

I.3-1

That route would:

1. Use less agricultural acreage.
2. Have less visual impact.
3. Have less habitat impact. (The vernal pools identified in Alternative B are man made and can be relocated or otherwise mitigated.)

All the alternatives identified as segment 2A (along State Route 99) would:

I.3-2

1. use more valuable agricultural land.
2. be a hazard to low flying agricultural aircraft operations.
3. be a possible hazard to the use of portable irrigation equipment such as sprinkler or gated pipe systems (typically 40 foot lengths).
4. be a possible hazard to ground operation of wide tillage, planting and harvesting equipment.
5. be a hazard to tall lifting equipment used for repair or installation of pumps and other equipment.
6. be a visual eyesore to motorists on Highway 99.
7. be a hazard to life flight aircraft responding to accident scenes on Highway 99.
8. interfere with improvements to Highway 99 which will be required in the future. (The one tower located next to Highway 99 at Catlett Road is already a good example.)
9. be a hazard for migrating waterfowl that typically congregate in the area between the Verona Cross Canal and Elverta Road along Highway 99 in the winter season.

I.3-3

I.3-4

I.3-5

I.3-6

Since this project is for the benefit of SMUD and Roseville service areas, these service areas should increase generating capacity and encourage conservation in their service areas. They could:

I.3-7

1. Constructing solar and wind generation facilities.
2. Develop more co-generation facilities
  - a. Blue Diamond facilities. I.3-8
  - b. Increase capacity of Athens co-generation plant. I.3-9

**Comment Set I.3, cont.**  
**Individual Commenter I.3**

Western Area Power Administration  
August 26, 2007  
Page 2

- 3. Require solar heat and electric installation in all new construction. ■ I.3-10
- 4. Require hook up impact fees to provide funding new generation facilities. ■ I.3-11
- 5. Encourage use of more efficient night and security lighting. ■ I.3-12
- 6. Re-conductor existing lines; increase voltage; improve or reconstruct old existing lines. ■ I.3-13
- 7. Improve existing SMUD hydroelectric facilities. ■ I.3-14
- 8. Build natural gas fired peak back-up plants. ■ I.3-15
- 9. Re-activate Rancho Seco ■ I.3-16
- 10. BUILD AUBURN DAM. ■ I.3-17

The Sacramento Area Voltage Support Project is to benefit the Sacramento and Roseville areas, therefore those areas should accept the environmental and economic impacts this project would cause rather than transferring the consequences to neighboring Sutter County. ■ I.3-18

Sincerely,



Melvin Borgman

**Comment Set I.4  
Individual Commenter I.4**

**BILL L. & SHARON D. BROWN**  
7925 East Levee Road  
P.O. Box 911  
Elverta, CA 95626  
Tel: (916) 991-3578  
Fax: (916) 992-0848

August 7, 2007

[SVS-EIS@wapa.gov](mailto:SVS-EIS@wapa.gov)

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVS Comments**

Dear Mr. Tuggle:

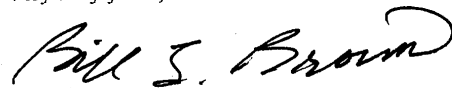
Our home and property are located on East Levee Road at Elverta Road.

We wish to express our very strong opposition to WAPA locating power lines through our property. WAPA Alternatives 2A1, 2A2, and 2A5 all will bring power lines within approximately 50 feet from our home.

Putting power lines this close to people's homes should not be acceptable where other good alternatives exist.

Please eliminate Alternatives 2A1, 2A2 and 2A5.

Very truly yours,

  
Bill L. Brown

I.4-1

**Comment Set I.5  
Individual Commenter I.5**

**C. MORRISON RANCH**

Charlotte Borgman  
(916) 655-3339  
FAX: (916) 655-1449

P. O. Box 771  
Pleasant Grove, CA 95668

Phillip Morrison  
(916) 655-3237  
FAX: (916) 655-3028

August 26, 2007

Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710  
Attention: Steve Tuggle, Natural Resources Manager

Subject: Sacramento Area Voltage Support Project

Ladies and Gentlemen:

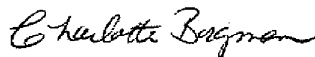
In response to the public comment period for the Sacramento Area Voltage Support Project, I provide the following comments regarding the possible routes for the proposed addition of 31 to 38 miles of new transmission lines between the O'Bannion Substation and the Elverta Substation. My comments are directed to the proposed alternative routes that parallel Highway 99, either to the east or to the west of the highway, south of the Verona Cross Canal. Each of these alternatives would require an easement from our ranch.

1. This route would have a negative visual impact for every person traveling north or south on Highway 99.
2. This alternative route would have a negative affect on future improvements to Highway 99.
3. This alternative route would cause an increased hazard for anyone leaving the highway during an accident and possibly coming to rest against a tower structure.
4. This alternative route would cause a hazard for life flight aircraft responding to an accident scene.
5. This alternative route could cause interference for the signal from the cell tower at the intersection of Highway 99 and Howsley Road.
6. This route would cause a hazard for the airplanes participating in agricultural practices in the area.
7. This alternative route would cause a hazard for well and pump installations and maintenance both for the C. Morrison Ranch and the Natomas Mutual Water Company's pumping plants.
8. This route would have a negative impact on the ground operations of our ranch and other agricultural operations along the route.
9. This route would require the further loss of acreage for farmers who were required to sell acreage to the state of California when Highway 99/70 was widened to four lanes.

The alternative route that would have the least effect on agricultural practices in the area is the one that utilizes the abandoned railroad right of way and the Pleasant Grove Creek Canal. This route would require less acreage for easements from agricultural operations and appears to be the most direct, requiring the least amount of new construction.

If this project proceeds, the residence of Sutter County will be required to suffer the impact of the added transmission system when Sacramento and Roseville are the recipients of the additional electricity. Sacramento and Roseville should provide additional electricity for their growth from within their boundaries, not cause negative impacts for their neighbors.

Respectfully Submitted,



Charlotte Borgman, Partner

1.5-1

1.5-2

1.5-3

1.5-4

1.5-5

1.5-6

1.5-7

1.5-8

1.5-9

1.5-10

1.5-11

**Comment Set I.6**  
**Individual Commenter I.6**

**JOHN CHANG & GRACE CHANG**

August 7, 2007

[SVS-EIS@wapa.gov](mailto:SVS-EIS@wapa.gov)

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVS Comments**

Dear Mr. Tuggle:

I am writing this letter on behalf of John Chang and Grace Chang, who own an undivided interest in 306 acres bordering SR 99 and Elverta Road. Your Alternative 2A3 will place power lines through this land at two locations: along the entire western boundary next to SR 99 and along the entire southern boundary north of Elverta Road. Your Alternative 2A5 will come through the middle of this property and interfere with both farming operations and proposed future development.

I.6-1

We are concerned about reducing developable acreage, the negative visual impacts and the harm to the development potential of the rest of the property. We also do not believe the proposed interchange and these power lines are in any way compatible.

I.6-2, 1.6-3  
and 1.6-4

We believe that major new power lines should be placed someplace other than in a proposed new development area. We also ask that you eliminate Alternative 2A5 on the basis that power lines should not come through the middle of our property (or anyone else's property) when other viable alternatives exist.

I.6-5

Very truly yours,



WARREN CHANG



**Comment Set I.7**  
**Individual Commenter I.7**

**SVS-SEIS - Sacramento Area Voltage Support Powerline Routes**

---

**From:** "jim crab" <jimc\_331@hotmail.com>  
**To:** <svs-scis@wapa.gov>  
**Date:** 8/23/2007 12:32 PM  
**Subject:** Sacramento Area Voltage Support Powerline Routes

---

Gentlemen;

In your Public Comment Forum Summary I received today, it refers to an **Abandoned** railroad right-of-way, (ROW). South of Baseline Road there is no ROW. That "right-of-way" was sold by the railroad to private parties and has not belonged to the railroad for some time now.

1.7-1

The town of Riego that one of your proposals will send the powerlines through, became a "**Legal Township**" in 1908, although it may not look like it at this time. If proposal #E3 is chosen, it will divide the town in half. I don't believe that doing this is in anyone's best interest and those of us living within the Riego Township would rather not have our town divided by high tension powerlines. They haven't been proven to be safe and to make our town smaller by doing this would be catastrophic to it's future growth.

1.7-2

There are plenty of other routes to take that would not impact an entire town. You need to use one of those alternatives.

Thank you, James Crabtree (Riego resident)

---

[Learn.Laugh.Share. Reallivemoms is right place!](#)

**Comment Set I.8**  
**Individual Commenter I.8**

**Richard L. & Judith A. Driggs**

7851 East Levee Road, P.O. Box 488  
Elverta, CA 95626  
Telephone: (916) 991-6255

August 7, 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

[SVS-EIS@wapa.gov](mailto:SVS-EIS@wapa.gov)

**RE: SVS Comments**

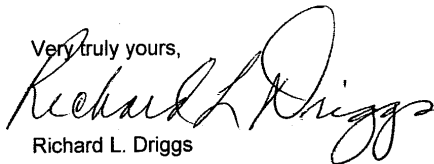
Dear Mr. Tuggle:

We live at 7851 East Levee Road. Your Alternatives 2A1, 2A2, 2A3, 2A4 and 2A5 will all come through our property. We wish to express our very strong opposition to WAPA locating power lines through our property and next to our home.

We plan to develop much of our 58 acres for residential use, but we are keeping our home and the acreage around it where we keep our horses. We believe that the WAPA overhead power lines will interfere with our development plans and reduce the value of our land. Most importantly, these lines directly impact our home. We cannot live with this intrusion.

Please select another route that does not interfere with our home and our proposed development.

Very truly yours,

  
Richard L. Driggs

I.8-1

I.8-2

**Comment Set I.9**  
**Individual Commenter I.9**

(2/26/2008) SVS-SEIS - Sac Area Voltage Project

Page

**From:** "Jean Frederick" <jfrederick@cityofsacramento.org>  
**To:** <svs-seis@wapa.gov>  
**Date:** 8/23/2007 4:57 PM  
**Subject:** Sac Area Voltage Project

Hi Steve,

I am a property owner of three parcels (023-0170-006,007,008) aka 555 Los Garcias and 577 Los Garcias. the old abandoned railroad that you list in the newsletter format. Isn't abandoned I own that. It appears from your map that 2B runs through my parcels.

I.9-1

I want to express the impact that would have on my family and our rental family unit next door. We reside on the property and the our tenant is a small family. Our quality of living would be compromised both aesthically and healthwise. Isn't there documentation of cancer causing from transmission lines so close to homes? Beside that the value of my property would diminish greatly.

I.9-2

I.9-3

I.9-4

However as I informed your company before if your company wishes to buy the parcels we would entertain a fair offer.

I.9-5

I would also like to comment that I did not receive the town hall meeting letter because rest assured I would have been there. The only documentation I receive is from Placer County who holds meetings in Auburn during working hours so I am unable to attend.

I.9-6

I would also like to comment that I received the news letter today on 8/23/2007 at 4:00 pm and I have to have comments by Monday. Isn't this a little unreasonable if you had the meetings on 8/7 and 8/8 that you had several days to precess comments and leave us three days during the height of vacation season?

Last but not least why do you have the hotline? I called it and all I received was information of the meetings that were already held and that I could contact you via e-mail. What ever happened to a phone number?

I.9-7

I am requesting to know if this 2B is coming across my property? I am also advising that I am not consenting to it . If this is so then two things either purchase the property or take me to court.

I.9-8

I am sure you know even with eniment domain it must be fair market value etc.

I am sure you will find that purchasing makes more sense for all involved.

Please advise mycontact info is listed below

Sincerely,

Jean Frederick

**Comment Set I.9, cont.**  
**Individual Commenter I.9**

(2/26/2008) SVS-SEIS - Sac Area Voltage Project

Page

Zoning Investigator  
City of Sacramento  
Code Enforcement Department  
desk phone (916) 808-5617  
e-mail: [jfrederick@cityofsacramento.org](mailto:jfrederick@cityofsacramento.org)

**Comment Set I.10**  
**Individual Commenter I.10**

**From:** Thomas Gianella [tgianell@syix.com]

**Sent:** Monday, August 27, 2007 8:07 PM

**To:** SVS-SEIS@wapa.gov

**Subject:** Comment

My family owns property in East Nicolaus (Striplin Road and Hwy 99), California, and we wish to express our concerns regarding the proposed project. First, we wish that the project would not encroach any parts of our land. The existing power lines are just west of our property and it is our desire that any new lines will not encroach our land, and in particular no power poles as well. Second, we would like to see the existing system just be revamped so that there is no need to build a duplicate set of transmission lines. Third, we also have concerns regarding health risks associated with these transmissions lines. A few years ago, the government did a study and found that there was adverse health risks associated with these transmissions systems.

I.10-1

I.10-2

I.10-3

I welcome the opportunity to learn more about the project as well as to completely discuss my concerns regarding the adverse impact that it will have on my land.

Thank you,  
Thomas Gianella  
tgianell@syix.com

**Comment Set I.11  
Individual Commenter I.11**

**Richard G. Hendrix & Lois A. Hendrix**  
7917 E. Levee Road, Elverta, CA 95626  
Tel: (916) 991-1403

August 7, 2007

SVS-EIS@wapa.gov

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVC Comments**

Dear Mr. Tuggle:

We are the owners of 26 acres south of Elverta Road and we wish to express our very strong opposition to WAPA's Alternatives 2A1, 2A2, 2A3 and 2A5, all of which will go through our property and will directly impact our home. We are planning to develop much of our property, but we will keep our home and the land around it.

I.11-1

Besides the very significant visual impacts on us and our home, we are concerned about the loss of development potential and how this will affect the value of our property.

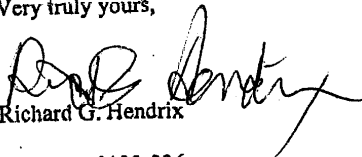
I.11-2

I.11-3

We ask that WAPA select an alternative that does not directly impact our home or the value of our property. We believe there are far fewer impacts with Alternatives 2B and 2C1 and one of these alternatives should be selected instead of a route which has such damaging impacts on us and our neighbors.

I.11-4

Very truly yours,

  
Richard G. Hendrix

APN 201-0190-036  
APN 201-0191-037

**Comment Set I.12**  
**Individual Commenter I.12**

(2/26/2008) SVS-SEIS - SVC Comments - parcels APN 201-0190-036 and 037 HENDRIX, RICHARD G. & LOIS A. Page

**From:** Dik Hendrix <theokieoasis@yahoo.com>  
**To:** <SVS-SEIS@wapa.gov>  
**Date:** 8/25/2007 12:52 PM  
**Subject:** SVC Comments - parcels APN 201-0190-036 and 037 HENDRIX, RICHARD G. & LOIS A.

Please consider this e-mail as an addendum to my letter of protest of August 7, 2007.

Placement of the lines on our property as proposed in WAPA's alternatives 2A1, 2A2, 2A3 and 2A5 of your maps would:

1. Place the lines in close proximity to my front yard. This would greatly reduce the value of my home. (it is a sturdily built Mexican style home (barrel tile, interior courtyard). It has excellent curb appeal. This puts a new and unattractive face on the property. Our neighbors on both sides, ie. the Driggs and Browns are in similar position. I.12-1
2. The development potential is greatly diminished and we are relying on this in funding our retirement.
3. The lines would go over my irrigation artery and would destroy the irrigation system as well as the use of my irrigation pump. This system also feeds the pond which we've used for fishing and horse exercise pool. I.12-2

My wife and I have lived on this property for 42 years. It is our home.

I realize this is a small acreage in your scheme of things. However, the impact to us is great and we appreciate your consideration of our problem in your decision.

If you have any questions, please call (916)991-1403 or e-mail us at theokieoasis@yahoo.com

-----  
Sick sense of humor? Visit Yahoo! TV's Comedy with an Edge to see what's on, when.

**Comment Set I.13**  
**Individual Commenter I.13**

**HAESUN KOO**  
13052 Evanston St.  
Los Angeles, CA 90401  
Tel. (310) 395-1427

August 7, 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVS Comments**

Dear Mr. Tuggle:

I own 160 acres on the north side of Elverta Road (Assessor's Parcel No. 201-0120-027). Alternatives 2A3 and 2A5 will send power lines right through my land.

I.13-1

I wish to register my strong opposition to WAPA's selection of any alternative which locates overhead power lines along Elverta Road or through the north part of my land (Alternative 2A5). These locations will severely impact the development of my property. Overhead power lines will (a) inhibit access onto my land, (b) reduce the value of the balance of the land, (c) have adverse visual impacts and (d) interfere with new infrastructure for development.

I.13-2 "(a)"

I.13-3 "(b)"

I.13-5

"(d)"

I.13-4 "(c)"

Please eliminate from further consideration Alternatives 2A3 and 2A5.

I.13-6

Please select Alternative 2B or Alternative 2C, which have the same environmental impacts but do not affect property proposed for development.

I.13-7

Very truly yours,

  
HAESUN KOO



**Comment Set I.14  
Individual Commenter I.14**

**KOURETAS PROPERTIES**  
JAMES L. KOURETAS & ASSOCIATES

TELEPHONE  
(916) 446-3145  
FAX (916) 441-2545  
EMAIL: ON REQUEST

30TH & H BUILDING  
725 30TH STREET  
SUITE 101  
SACRAMENTO, CALIFORNIA 95816-3841

August 27, 2007

Transmitted via Fax (916) 985-1936  
And U.S. Mail

Mr. Steve Tuggle  
Natural Resources Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 9530-4710

RE: SVS Comments  
Property located at 7471 E. Levee Road

Dear Mr. Tuggle:

I am the owner of approximately 59 acres located south of Elverta Road at 7471 E. Levee Road. I strongly oppose the extension of power lines along the west and south boundaries of my property. I am very concerned about the amount of acreage on my property which WAPA will want to acquire, as well as the harm to the development potential of my property if it has power lines on two sides, whether on my property or not.

I.14-1

I.14-2

I.14-3

I think that locating major new power lines in an area slated for new development makes for very poor planning. As you know, my property is part of the "Joint Vision Area" which is proposed for new development by the City of Sacramento. Given that the East Main Drain lies on the east side of my property, and WAPA is proposing power lines on the west and south, I am very concerned about my access as well.

I.14-4

I.14-5

Any attempts to acquire my property will be resisted and will result in litigation.

I.14-6

Very Truly Yours,

JAMES L. KOURETAS

JLK/jly

**Comment Set I.15  
Individual Commenter I.15**

**SUNG WOO LEE & HYUN JOO LEE**

August 7, 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVS Comments**

Dear Mr. Tuggle:

Sung Woo Lee and Hyun Joo Lee own an undivided interest in 306 acres on the north side of Elverta Road next to SR 70/99. Their Assessor's Parcel No. is 201-0120-035.

I.15-1

The Lees are strongly opposed to WAPA's location of overhead power lines along Elverta Road and SR 70/99 and through the middle of their property. Alternatives 2A3, 2A4 and 2A5 go down the west side of their property. Alternative 2A5 turns east and goes through the middle of their property.

We believe that the WAPA overhead power lines may make development impossible or very difficult because of visual intrusions and loss of easy access. If both the interchange and the power lines are placed on the Lees' property, the development potential of their property will be greatly reduced. No power lines should go through the middle of any property when other routes are available. For these reasons, right-of-way acquisition will be very expensive because of severance damages.

I.15-2, I.15-3

I.15-4

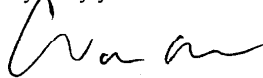
I.15-5

I.15-6

— Please select another route, such as Alternative 2B, which appears to have the fewest impacts.

I.15-7

Very truly yours,



WARREN CHANG  
ON BEHALF OF THE LEES

**Comment Set I.16**  
**Individual Commenter I.16**

TO:  
WESTERN AREA POWER ADMINISTRATION  
SIERRA NEVADA REGION  
114 PARKSHORE DRIVE  
FOLSOM, CA. 95630-4710

AUGUST 24, 2007

FROM: ERNEST AND CINDY MORGAN  
P.O. BOX 381  
ELVERTA CA. 95626

TO: STEVE TUGGLE and  
WESTERN AREA POWER ADMINISTRATION

In connection with the Sacramento Area Voltage Support Project, as landowners (APN# 35-273-004) adjacent to a proposed Electric Transmission Line, IT APPEARS TO US THAT YOU ARE USING THE OLD RAILWAY RIGHT OF WAY AS A MEANS OF AVOIDING THE COST AND TROUBLE ASSOCIATED WITH THE PURCHASE OF THE BEST EASEMENT. THE OLD RAILWAY SEEMS TO BE CONVENIENT FOR YOUR PURPOSES.

I.16-1

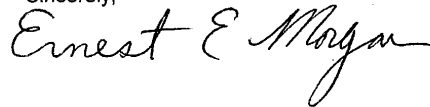
We also are concerned about the LONGTERM HEALTH IMPACTS this will have on our family.

I.16-2

This will HAVE a NEGATIVE IMPACT OUR PROPERTY'S VALUE and its FUTURE ABILITY FOR SALE.

I.16-3

Sincerely,



**Comment Set I.17**  
**Individual Commenter I.17**

August 7, 2007

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**SVS-EIS@wapa.gov**

RE: SVS Comments

Mr. Tuggle:

My family and I own 499 acres fronting on and north of Elkhorn Boulevard, which will be directly affected by WAPA's Alternative 2A4, which would place two 230 KV power lines on the north side of Elkhorn Boulevard. Our Assessor's Parcel Numbers are 201-0200-028, 201-0210-014, and 201-0210-013.

I.17-1

Elkhorn Boulevard currently forms the northern boundary of the City of Sacramento, but as WAPA is aware, the City is considering a major new development area which will extend north from Elkhorn Boulevard and include our family's 499 acres.

In reviewing your EIR/EIS, it appears that the environmental considerations are about the same for each alternative. However, your Alternative 2C1 has fewer impacts on proposed development areas, and extends over existing right-of-way. This alternative would be preferable to alternatives which significantly impact future growth areas. Note that development in this area is recommended under the "Blueprint" plan approved by local government agencies under the leadership of the Sacramento Area Council of Governments.

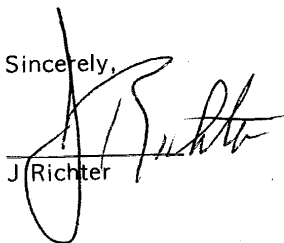
You are no doubt familiar with the types of impacts which these power lines will cause. These include limitations on access, health concerns from adjacent residents about possible emissions, need to locate schools away from the power lines, interference with other infrastructure needed to serve future development, etc. These are very significant impacts and should be avoided where, as here, other alternatives are available.

I.17-2,  
I.17-3,  
I.17-4,  
I.17-5  
I.17-6

Please select Alternative 2C1 and reduce the impacts on a major future development area for the City of Sacramento.

I.17-7

Sincerely,



J. Richter

**Comment Set I.18**  
**Individual Commenter I.18**

**From:** Tina Royer [tleeroyer@sbcglobal.net]  
**Sent:** Friday, August 31, 2007 4:39 PM  
**To:** svcs-seis@wapa.gov  
**Subject:** SEIS/EIR  
Please add:  
Nathaniel and Tina Royer  
215 Singh Lane  
Rio Linda, CA 95673

to your mailing list.

We own parcel 202-0030-051 and are building a home on it.

If the decision is made to go with alternative 2B, the power lines would go right over our new home. So, we wonder if you could give us an estimate of how far in the future the lines would go in. Are we looking at 5-10 years? Less? More? Of course, it's all hypothetical until we know if it passes.

Thanks for any help you can give us.

Tina Royer

I.18-1

**Comment Set I.19**  
**Individual Commenter I.19**

(2/26/2008) SVS-SEIS - Sac. Area Voltage Support Project

Page

**From:** <NorskeMCS@aol.com>  
**To:** <svs-seis@wapa.gov>  
**Date:** 8/24/2007 11:13 AM  
**Subject:** Sac. Area Voltage Support Project

My husband and I are landowners in two locations that may well be effected by the SVS Project. I am attempting to see exactly where, in relation to our properties, the proposed routes will be.

I.19-1

We have land in Sutter County--1.3 miles west of Hwy. 99 on West Catlett Rd. and in Sacramento County on the north side of Elverta Road approximately 1/4 mile west of the intersection of Rio Linda Blvd. and Elverta Road. If you need more specifics, i.e. parcel numbers, please let me know.

From the small maps that have been sent to us it is difficult to get the exact location. As I look at the maps it would appear that there would be no construction on or over our property but I would like someone to be specific as to the project location.

We can be reached at:

Jack & Marilyn Scheidel  
1510 West Catlett Rd.  
Pleasant Grove, CA 95668  
Office (916) 655-3419  
Fax (916) 991-3265  
Cell (916) 417-0767 (Marilyn's)  
e-mail [\\_norskemcs@aol.com](mailto:_norskemcs@aol.com) (mailto:norskemcs@aol.com)

We hope to hear from you at your earliest convenience. August 27th is upon us.

Thanks,

Marilyn (and Jack) Scheidel

\*\*\*\*\* Get a sneak peek of the all-new AOL at  
<http://discover.aol.com/memed/aolcom30tour>

**Comment Set I.20**  
**Individual Commenter I.20**

**LAVERNE C. & MOLLY SCHEIDEL**  
328 West Elverta Road, Elverta, CA 95626  
Tel/Fax: (916) 991-1944

August 7, 2007

[SVS-EIS@wapa.gov](mailto:SVS-EIS@wapa.gov)

Mr. Steve Tuggle  
Natural Resource Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

**RE: SVS Comments**

Dear Mr. Tuggle:

We are the owners of 105 acres north of Elverta Road (APN 201-0110-020) and wish to express our very strong opposition to WAPA locating power lines along the north side of Elverta Road or along the west side of the Natomas East Main Drain, on our property. We are planning to develop our property and believe the WAPA lines will make it more difficult to plan our property and will reduce our property values significantly. I.20-1  
I.20-2

We are greatly concerned about how unsightly the lines will be, and how they will interfere with planning. This is the wrong location. Sacramento is planning a major new development and these power lines are incompatible with new development. Your power lines will also interfere with the new freeway interchange at Elverta and Highway 99. I.20-3  
I.20-4  
I.20-5

Please eliminate Alternatives 2A1, 2A2, and 2A5 (all of which come through our property) and any other alternative that affects our land. Please consider Alternatives 2B or 2C1, which go over existing right-of-way. I.20-6

Very truly yours,

*LaVerne Scheidel*  
LaVerne Scheidel

*Molly Scheidel*  
Molly Scheidel

**Comment Set I.21**  
**Individual Commenter I.21**

**SILLS FARMS, INC**  
**5072 PACIFIC AVENUE**  
**PLEASANT GROVE, CA 95668**  
**(916) 655-3391 FAX (916) 655-3699**

August 26, 2007

Steve Tuggle  
Natural Resources Manager  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Drive  
Folsom, CA 95630-4710

Dear Mr. Tuggle,

I am a landowner and farmer in the Pleasant Grove area and would like to comment on the Sacramento Area Voltage Support Project. Sils Farms, Inc and Edward M. Sils are farming either owned or leased land impacted by the routes proposed for the Sacramento Area Voltage Support Project. Presently on our farmed properties, we have 23 transmission towers that are interfering with our farming practices.

The problems caused by these towers are many:

- 1) Ground preparation ( plowing, disking, planing) is hampered with these obstructions in the field. Tractor passes are restricted and the process of driving around the towers with tillage equipment results in the land less level around the towers.
- 2) Having a high voltage tower presents a dangerous situation with large tractors and large tillage equipment which, in the case of a collision, could cause a tower to fall with very destructive and possibly lethal consequences. Tractor work in field with transmission towers requires a higher skilled operator, so that such scenarios do not occur.
- 3) Transmission towers cause additional problems with row crops which are tractor cultivated and siphon pipe irrigated. When cultivating, driving around the towers often destroys the planted crop in the adjacent rows. Also considerable hand work is required to convey the irrigation water around the towers into the rows that the tower intercepts. We plant and cultivate with equipment which is 20 feet in width. If any part of this width intercepts with the tower, the equipment must be lifted up and driven around to the other side, the result being that the area unplanted usually is twice the actual footprint of the tower.
- 4) Aerial application of seed, fertilizer, and chemicals are restricted with transmission towers in fields. All aerial applications are less accurate and even when transmission towers are present, especially on windy days. As the planes have to fly high over the towers and electric lines, wind can move any application out of its proscribed pass. This results in areas of either overlap or

I.21-1



**Comment Set I.21, cont.  
Individual Commenter I.21**

skips. During spring of 2007, a field with transmission towers was not seeded with rice by air because of the windy conditions that day, which would result in a poor job. Aerial seeding had to wait until the next afternoon. Because the soaked seed sat in a truck an extra 32 hours, the rice disease "Bakanae" developed and is present in this field, with a small yield effect. However, this disease organism can remain in the field and affect future rice crops.

- 5) The area under the towers cannot be cultivated and are a source of weeds, which produce seeds annually which spread onto the adjacent lands. As reported above, because of interference with tractor passes, the area affected can be up to twice the actual tower footprint.

I have heard it said that landowners already impacted with transmission towers should have the new proposed lines located on their properties because they are "used to dealing with them". This concept is totally erroneous. I do not see how it is appropriate or fair for landowners already burdened by transmission towers to have additional transmission towers and lines placed on their properties.

Alternative Route 2B, following the Pleasant Grove Creek Canal is the best alternative, as it minimizes the impact on farming practices.

I cannot find any discussion of the impacts on farming operations described above in the Draft EIS/EIR. I would hope that the final report would examine the problems described above.

Sincerely,

Edward M Sills, V.P.  
Sills Farms, Inc.

I.21-1, cont.

I.21-2

I.21-3

I.21-4

I.21-5

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Comment Set PF.1  
Northern California Power Agency

## Public Comment Form

Sacramento Area Voltage Support Supplemental Environmental Impact Statement and Environmental Impact Report

A critical part of the public comment forum process is to obtain comments from interested parties and the general public regarding concerns, issues, and questions on the project alternatives. You may use this form for your written comments and either drop it in the comment box provided at any of the public comment forums or mail it at a later time. Written comments must be received by August 27, 2007.

(Please Print)

Name: Nannette Engelbrite  
 Title: SE Contract Specialist  
 Organization: NCPA  
 Address: 180 Kirby Way  
 City: Roseville State: CA Zip Code: 95678  
 Daytime Phone Number: 916-781-4272  
nannette.engelbrite@ncpa.com

Comments: NCPA is a owner/member of the Transmission Agency of Northern California (TANC). TANC is evaluating a new transmission project, Zeta, that is proposed to be in the same vicinity & in same interconnection points as the SVS.

NCPA is requesting that western & its partners coordinate closely w/ TANC staff when siting the SVS Project.

Zeta is a 500-kV project, which the ROW is not easy to site. NCPA would be very disappointed if the SVS Project did not take location of future projects into consideration.

Therefore the request for close coordination and information sharing.

Thank you,  
je

Supplying Energy  
Preserving Reliability

PF.1-1

Comment Set PF.2  
La Verne Scheidel



Western Area Power Administration  
Sierra Nevada Region  
Mr. Steve Tuggle  
114 Parkshore Drive  
Folsom, CA 95630-4710

Toll-Free Hotline: 866.859.5128  
Fax: 916.985.1938

E-mail: [svs-eels@wapa.gov](mailto:svs-eels@wapa.gov)  
Please include:  
"SVS Comment"  
in the Subject Line

Internet Website:  
[www.wapa.gov/sr/planning/SVS](http://www.wapa.gov/sr/planning/SVS)

Supplying Energy  
Preserving Reliability

# Public Comment Form

Sacramento Area Voltage Support Supplemental Environmental Impact Statement and Environmental Impact Report

A critical part of the public comment forum process is to obtain comments from interested parties and the general public regarding concerns, issues, and questions on the project alternatives. You may use this form for your written comments and either drop it in the comment box provided at any of the public comment forums or mail it at a later time. Written comments must be received by August 27, 2007.

(Please Print)

Name: LaVerne Scheidel  
Title: owner/operator  
Organization: farmer  
Address: 328 W. Elverta Rd  
City: Elverta State: CA Zip Code: 95626  
Daytime Phone Number: 916 991-1944

Comments: Why can't they hook on to the existing lines coming in from Shasta to the Elverta Substation-

Why don't you use land that isn't good for farming i.e. the old rail road line sat on the Drainage canal

There are 3 routes that will cross our ground they are #2A1, 2 and 5  
Segment # 2A5 will create a 90° corner on our land this will make it impossible to fly or seed + fertilizers etc. This will greatly reduce our ability to farm - It will increase all the expenses of farming that ground. Even the other 4 segments will increase the costs.

PF.2-1

PF.2-2

PF.2-3

**Comment Set PF.3  
Roseville Oral Public Comments**

1 Thank you.

2 MRS. SCHEIDEL: I am Molly Scheidel. I am  
3 not LaVerne. LaVerne is my husband. He's the  
4 landowner. But we take issue with the -- it's  
5 A2(1), A2(2) and A2(5) will impact the ground that  
6 we have tremendously because it -- A2(5) is got a  
7 90-degree angle in the corner of our ground, and it  
8 is farm ground and it will certainly eliminate any  
9 chance of having airplanes fly the way we do now.  
10 And it will increase our cost. It will decrease the  
11 value of our property, and we take issue with it.  
12 And it will definitely cost us part of our  
13 inheritance.

14 So I don't appreciate it at all, and I don't  
15 understand why the other areas that do not have  
16 viable farm ground can't be utilized rather than to  
17 come over ground that is already tillable.

18 I probably could say more.

19 MR. KAWAMURA: Would you like to say more?  
20 You can.

21 Just a clarifying question. By airplanes  
22 flying, do you mean crop dusters?

23 MRS. SCHEIDEL: Crop dusters. They apply  
24 the seed. They apply fertilizer. They apply  
25 herbicides.

PF.3-1 (cont.  
below)

PF.3-2

PF.3-3

PF.3-1, cont.

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7

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1           What else? That is pretty much it.

2           MR. SCHEIDEL: Bck in 1951 when they

3 brought the power line down from Shasta down to

4 Elverta substation, they went through the property

5 that we farmed; and from then on the airplanes would

6 no longer fly that field, and it put us out of

7 business. And all it done was bought a right-of-way

8 there. They put it right in the middle of December

9 and they stuck the tractors out there and left the

10 ties out there when I farmed it and left ruts and

11 tore up my equipment. This is the way they leave

12 your ground after they get done with it.

13           MRS. SCHEIDEL: He says ties. They used

14 railroad ties to put into the mud to get the

15 tractors out, and they didn't bother to remove them.

16 So it destroyed the property pretty much, and then

17 we couldn't farm under the lines anymore. We

18 couldn't farm the way --

19           MR. SCHEIDEL: The ground, period.

20           MRS. SCHEIDEL: Yeah.

21           MR. KAWAMURA: Thank you very much for

22 those comments. I appreciate that.

23           The next commenter I have on here is R.C.

24 Wallace.

25           MR. WALLACE: I have property that would be

PF.3-4

PF.3-5

PF.3-6

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 adversely affected by 2C1, and we have already got a  
2 whole slug of ugly tie transmission lines, cuts our  
3 property right diagonally in half. We farm rice.

4 We have already been put on notice by the  
5 tenant farmer and by the crop dusting service that  
6 if they put any more towers on that property they  
7 are not going to farm. It is too dangerous. They  
8 are already violating numerous FAA regulations  
9 because they have to fly under the wires. That is  
10 an FAA violation, but they have to also comply with  
11 various federal regulations, that, if you are  
12 applying pesticide and other kinds of things to the  
13 fields, you have got to be down within six feet of  
14 the ground. You can't spray it from up high. You  
15 can drop seed up from on high, but you can't spray  
16 chemicals from up high; you have to get right down  
17 on the deck.

18 We have 17 different transmission lines of  
19 some kind on our property. We don't need any more.

20 And there is an alternate way to get this  
21 accomplished, which you answered part of my  
22 concerns. That is the book that we got that says  
23 that the most, it's my words, the most correct route  
24 would be that 2B. But in the book it says it's been  
25 considered and rejected. I am glad to hear that

PF.3-6, cont.

PF.3-7

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 it's not because that route 2B goes right down a  
2 canal where they already have some other  
3 transmission lines in the middle of the canal  
4 farther south.

5           And in our area and farther north there is  
6 nothing there except an old abandoned railroad  
7 track. There are no houses. There is no nothing.  
8 That makes so much sense to go that route that I'm  
9 fearful that it won't be chosen. When I saw it was  
10 already rejected, that is one of the reasons I am  
11 here tonight, is to make certain that it is not  
12 rejected because it makes too much sense. It is a  
13 straight line from Howsley Road down to Elverta  
14 where you want to end up.

15           So we can't have any more towers on our  
16 property or we go out of business, and it doesn't  
17 make any sense to put them there, anyway.

18           Thank you. As opposed to 2B.

19           MR. KAWAMURA: Thank you.

20           MRS. SCHEIDEL: Do you want to collect  
21 these?

22           MR. KAWAMURA: If you have written  
23 comments, I will take those.

24           Thank you.

25           I have gone through the list that I have on

PF.3-7, cont.



**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 the registration for the public comments. I don't  
2 have anyone else listed, but anyone else who is in  
3 the audience is welcome to provide public comment.  
4 If you do provide some public comments and you are  
5 not on the list, if you can spell your name and  
6 provide an address for the Court Reporter.

7 MR. THOMAS: I should have checked that I  
8 want to comment. When I signed in, says yes.

9 My name is Norman James, J-a-m-e-s. My  
10 address is 5010 El Centro Boulevard, Pleasant Grove,  
11 California 95668.

12 You want my telephone number?

13 MR. KAWAMURA: No.

14 MR. THOMAS: My comment is: How come  
15 Elverta substation or you got to send the power  
16 there where you are going to sell it to Roseville or  
17 some other place? And two, where you are getting  
18 the power from is up at Yuba City. Yuba City and  
19 Marysville has to use power.

20 Why can't that power be sold to them instead  
21 of putting these transmission lines down through  
22 farmers, which is a pure headache out there?

23 Now we're going to fight you people over it  
24 because we have to carry, and this isn't enough, a  
25 million dollars' insurance in case someone hits one

PF.3-8

PF.3-9

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 of them towers. You shouldn't put that liability on  
2 us. And you can't set with an employee 24 hours up  
3 there. Now if you go through like you are going to,  
4 why can't you rent that property off of us instead  
5 of turning around, buying it and then giving it back  
6 to us?

PF.3-9, cont.

PF.3-10

7 You know what the expense is for us to keep  
8 the obnoxious weeds out from underneath the tower  
9 plus the liability we have? Nobody looks at that.  
10 Nobody cares about it. But with us, we think it is  
11 worth fighting for. And I don't see why you people  
12 are getting money for that power.

PF.3-11

13 If you are going to go through us, why can't  
14 you rent that so at least we can have some money for  
15 the amount of insurance we have to carry, and a  
16 million dollars is nothing. We probably lose all of  
17 our property if some hired hand hit it.

18 And I think there is other means that you guys  
19 can do or other routes, and why put two -- you are  
20 going to put two sets of towers on us, and it just  
21 ruins our property. And we sell it? You say you  
22 can use it. They can put houses. They can put  
23 parks up. You think those people are going to  
24 actually give us what they would if them towers  
25 wasn't there? No. They look at it, say, "Hey, we

PF.3-12

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 don't want them damn things."

2 I don't know. I think there is other means or  
3 routes that you people can do instead of coming  
4 down. There is an old set of railroad tracks there.  
5 I don't know why you couldn't use that to bring your  
6 towers down instead of going through farmland. And  
7 the same thing, that goes right into that canal and  
8 that you are talking about, that you still might do.  
9 Because that there, you are not taking farmland;  
10 you are taking wasted land. And it is going to cost  
11 you more, but you are making big money, anyway.  
12 And, well, that's it.

13 I might have more comments, written comments,  
14 to you.

15 MR. KAWAMURA: Thank you. I would  
16 appreciate any more type of comments that you may  
17 have. I do appreciate the comments which we  
18 received today.

19 MRS. WALLACE: Shirley Wallace, 2950  
20 Fifield Road, Pleasant Grove.

21 All of the rice farmers in Pleasant Grove that  
22 have been impacted by the towers that you erected  
23 50 years ago are being hit again. It just seems  
24 very unfair that if you do have to go through  
25 farmland why are you hitting the same people again.

PF.3-12, cont.

PF.3-13

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 MR. KAWAMURA: Thank you for those  
2 comments.

3 Does anyone else want to provide comments at  
4 this public comment forum?

5 MR. GIANELLA: Have a comment.

6 MR. KAWAMURA: If you come up here just so  
7 -- I am not sure my cord goes all the way back  
8 there. Again, if you can give us your name.

9 MR. GIANELLA: Tom Gianella. My family  
10 owns some property there.

11 Regarding segment one. You are going to  
12 parallel the existing parallel line. Could you guys  
13 possibly use the existing power line and just run  
14 the wires double?

15 MR. KAWAMURA: At public comment forum, we  
16 are just taking only comments right now, but feel  
17 free to ask the staff. We have staff here today,  
18 and you can ask the staff that question afterwards  
19 or provide that as a comment. We will provide an  
20 answer as part of the final record.

21 Does anyone else have any comments at this  
22 public comment forum? Again --

23 MR. WALLACE: Robert Wallace, 2950 Fifield  
24 Road, Pleasant Grove.

25 My wife reminded me of something. I am not a

PF.3-14

PF.3-15

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 lawyer, but I have been dealing with them 45 years.  
2 But anyway, in talking with a couple of them about  
3 this issue about piling on to people who are already  
4 adversely affected. And the gist of the  
5 conversation was that that is not legal, that the  
6 governmental agencies have an obligation to spread  
7 the misery, and you can't keep piling on the same  
8 people just because somebody agreed back in 1900 to  
9 allow a right-of-way to come through, that you just  
10 keep piling on to those same people.

PF.3-15, cont.

11 I saw somewhere in the earlier environmental  
12 impact report when we went to another meeting like  
13 this in Pleasant Grove about a year ago. And there  
14 was published material that came out then that makes  
15 the incredible statement that as far as monetary  
16 remuneration to the people that are affected, and  
17 paraphrasing, basically said that they don't have to  
18 because they have already got the right-of-way from  
19 1900.

PF.3-16

20 And as far as visual effects to the area,  
21 basically what it said is you already got one ugly  
22 transmission line so two shouldn't make that much  
23 difference. I think that is incredible.

PF.3-17

24 You've got other alternative routes where  
25 there is no people, there is nothing there, no

PF.3-18

**Comment Set PF.3, cont.  
Roseville Oral Public Comments**

1 houses, no nothing. It is a straight line down to  
2 Elverta. Why zigzag through and pile on to the  
3 people that are already adversely being affected?

4 MR. KAWAMURA: Thank you for those  
5 comments.

6 Are there any last comments?

7 Again, I want to remind folks that the public  
8 comment period runs through August 27th. We will  
9 have one more public comment forum tomorrow over at  
10 the Sacramento Municipal Utility District in  
11 Sacramento, California. Again, that the comment  
12 period will start tomorrow at seven. There will be  
13 open house from six to seven. Very similar to  
14 today.

15 So if you have additional public comments that  
16 you want to provide orally, you can provide those  
17 tomorrow. If you want to provide written comments,  
18 again, the consultation and comment period closes on  
19 August 27th. And written comments may be sent to  
20 Steve Tuggle at Western Area Power Administration.

21 With that, Western will consider all public  
22 comments which it receives during the consultation  
23 and comment period as part of its final decision.  
24 And the answers to the comments will be provided in  
25 the final Federal Register notice.

PF.3-18, cont.

**Comment Set PF.4  
SMUD Oral Public Comments**

1 you have an unusual spelling, for the record,  
2 please. After you provide your name, I'll go ahead  
3 and give you the microphone and you can provide your  
4 comments. There may be a couple of clarifying  
5 questions that may be asked by myself or Mr. Tuggle  
6 or Cathy Cunningham of our staff.

7 With that, I am going to go on ahead and call  
8 our first commenter.

9 Mr. Ed Willey or Willy.

10 MR. WILLEY: Willey, you got it. Where is  
11 the mike? Thank you.

12 I wish we had the map showing up there of the  
13 alternatives here so we can all view it. It is a  
14 little bit difficult. I think it would be better so  
15 we each could look at it. We are talking about  
16 different alternatives.

17 MR. KAWAMURA: They are going to try to  
18 find a map.

19 MR. WILLEY: Actually, what we are looking  
20 at is the area around Elverta Road up to the county  
21 line. Down just a little bit. There you go.

22 MR. KAWAMURA: Just for the record, we are  
23 looking at that same exhibit that Mr. Tuggle just  
24 referenced.

25 MR. WILLEY: Fine. My name IS Ed Willey.

8

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**Comment Set PF.4, cont.**  
**SMUD Oral Public Comments**

1 I live at 4455 Garden Highway, Sacramento. My wife  
2 and I own three parcels of property in Natomas. Two  
3 adjacent to Garden Highway and one adjacent to  
4 Elverta and Highway 99/70. We have learned that the  
5 WAPA has proposed a new alternative for its  
6 Sacramento Area Voltage Support Project which runs  
7 right through our properties.

8 This is Alternative 2A5. This alternative  
9 will come across the entire southern part of our  
10 property where it will interfere with farming  
11 operations and also future development. I note that  
12 alternative 2A5 also comes through the middle of the  
13 parcel to the west of me and through the middle of  
14 the five parcels to the east.

15 I believe power lines should not be located in  
16 the middle of people's properties where other good  
17 alternatives are available. WAPA has identified at  
18 least two other locations. Alternative 2B which  
19 runs along the Pleasant Grove Creek canal and over  
20 an abandoned railroad right-of-way and Alternative  
21 2C1 which runs over the existing right-of-way which  
22 will not effect property use, property development  
23 or farming. According to the EIR, these  
24 alternatives have no additional environmental  
25 impacts.

PF.4-1



**Comment Set PF.4, cont.  
SMUD Oral Public Comments**

1           Therefore, I believe that WAPA should choose  
2 Alternative 2B or 2C1 as the impacts on current uses  
3 and farming and future development are much less in  
4 these locations.

PF.4-1, cont.

5           Thank you for your consideration.

6           MR. KAWAMURA: Thank you for your comments,  
7 Mr. Willey.

8           The next commenter I have is Bill and Sharon  
9 Brown.

10           MR. BROWN: I am Bill Brown, and my wife is  
11 Sharon Brown, B-r-o-w-n. We live at 7925 East Levee  
12 Road, Elverta, California. And our property exists  
13 at the southwest corner of Elverta Road and East  
14 Levee.

15           When I look at the map, No. 2A-1, 2A-2 and  
16 2A-5, all go from a west to an east direction, and  
17 they will intersect with East Levee Road. If you  
18 look on the map that goes southerly across Elverta  
19 Road and is a residential area which I represent two  
20 other homeowners. Along East Levee Road are all of  
21 our egress, go onto East Levee Road. So I know for  
22 a fact that you cannot build anything within 25 foot  
23 of that East Levee Road. So from what I gather  
24 there is 125, a hundred-foot easement for that  
25 tower. So you add 25 or more, depends on the

PF.4-2

**Comment Set PF.4, cont.**  
**SMUD Oral Public Comments**

1 topography, to the 150, so you are getting away from  
2 the levee and that is where we built our homes. We  
3 have myself, the Browns, the Hendricks and the  
4 Dreggs, and they belong to that Brookfield Group and  
5 I don't. They probably represent them also.  
6 But what I am saying is encroachment on our  
7 property will ruin the integrity of our driveway and  
8 our lifestyle out there looking at towers, which  
9 would be, like, 50 foot from my bedroom window.  
10 And I recommend yes on C1 and yes on 2B, using  
11 the standards that Mr. Willey gave.  
12 MR. KAWAMURA: Thank you for your comments.  
13 Any questions?  
14 The next commenter I have is J. Norman.  
15 MR. NORMAN: That is me. Obviously, I  
16 flunked my handwriting course.  
17 MR. KAWAMURA: State your name and spell it  
18 for the record.  
19 MR. NORMAN: My name is John Norman, and I  
20 am with Bookfield Land, located at 2271 Lava Ridge  
21 Court, Suite 220 in Roseville, California. I  
22 represent a number of property owners in the Natomas  
23 Basin, of which a good number of these alignments  
24 affect those properties in one form or another.  
25 Before I go into specifics on that, I did want

PF.4-2, cont.

PF.4-3

**Comment Set PF.4, cont.**  
**SMUD Oral Public Comments**

1 to kind of backtrack to the reason for this line.  
2 One of those reasons that was told to us was because  
3 Homeland Security. And if we look at the redundancy  
4 you are trying to create away from existing lines,  
5 sooner or later it comes back to the existing  
6 alignment before it gets up to the O'Banion Station.  
7 And you have most of this line still at risk. And  
8 any terrorist knows, okay, you don't attack this  
9 portion, but we do attack the place where they come  
10 back together on one side or the other.

PF.4-4

11 I have some question about the -- for the  
12 expense being incurred here or have we really  
13 created redundancy in the system. That was the  
14 first comment.

15 Second comment, let me pull up a graphic here.

16 MR. KAWAMURA: Do you want to introduce  
17 this as part of the record?

18 MR. NORMAN: Yes.

19 MR. KAWAMURA: Can we actually get one?

20 MR. NORMAN: Do that now or later?

21 MR. KAWAMURA: Why don't we do that now.

22 MR. NORMAN: The area that we represent is  
23 part of the Joint Visionary. As a number of people  
24 in this room know, that is a cooperative effort  
25 between the County of San Diego -- County of

PF.4-5

12

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**Comment Set PF.4, cont.**  
**SMUD Oral Public Comments**

1 Sacramento and the City of Sacramento to pursue a  
2 joint vision of development and open space for what  
3 initially started out as 10,000 acres of development  
4 and is now down to about 6,000 acres of development  
5 offset by another 6,000 acres of open space. The  
6 airport taking up a lot of that, the rest of that  
7 area that would have been.

8 One of the things that came up through this  
9 process, after we took a look at the alignment, the  
10 blueprint called for -- the SACOG blueprint plan  
11 called for various areas as shown as development and  
12 open space. On your plan you've got 2A5 shown at  
13 what has been called the community separator. The  
14 City adopted a map that said one mile of community  
15 separator. The County has not. There is not a full  
16 recognition of exactly one mile from the county  
17 line. I think that is where the K5 line came from.

18 Second of all, if you sit down and take a look  
19 at trying to incorporate the development, a number  
20 of these lines create conflicts with infrastructure,  
21 not the least of which is Elverta where it comes  
22 into contact with Highway 99. There will be a  
23 future interchange that CalTrans is currently  
24 reviewing for a study report and existing widening  
25 as it relates to Elverta Villages, and the County

PF.4-5, cont.

PF.4-6

**Comment Set PF.4, cont.  
SMUD Oral Public Comments**

1 has those on record. I think you are going to be  
2 heading into future conflicts with those.

PF.4-6, cont.

3 MR. KAWAMURA: Just so the record is clear,  
4 if we can go ahead and mark this as Exhibit 1. And  
5 the interchange that you are pointing to is?

6 MR. NORMAN: Highway 99 and Elverta.

7 MR. KAWAMURA: The circled item on Exhibit  
8 1 at the intersection of Highway 99 and Elverta, and  
9 there is a dotted circle around it.

10 MR. NORMAN: One of the items that comes  
11 into conflict is future drainage infrastructure.  
12 And as we know in the Natomas Basin, this is the  
13 number one issue in terms of how we deal with that.  
14 In particular, our group has sat down and has taken  
15 a look at a possible configuration for a drainage  
16 facility that provides a community separator that  
17 will include, primarily, a habitat north of the  
18 lake, and south of the lake we would have  
19 development. This would provide a buffer between  
20 human interaction and the habitat areas.

PF.4-7

21 2A5 runs right through the middle of that and  
22 would the create future conflicts.

23 School. Potential school siting conflicts is  
24 another issue. Anytime that you get into  
25 development we start taking a look at the radius

PF.4-8

**Comment Set PF.4, cont.  
SMUD Oral Public Comments**

1 that you need to position both elementary, middle  
2 and high schools. And we've taken some  
3 representations and put those into our plan. As you  
4 can see, a number of the alignments you cut right  
5 through that school or near a school. That we know  
6 will be at issue.

7 Visual intrusion would be obvious, especially  
8 when you are looking at 2A4, 2A3, and anywhere where  
9 the lines run parallel to 99. This is a big issue  
10 to both the agencies involved and also from the  
11 landownership perspective, that this would be the  
12 first thing you see when you come into this area.

13 I think a number of homeowners that are along  
14 the East Levee Road have already spoken. I am sure  
15 more will. That is another issue for the existing  
16 situation, separate from development interests, that  
17 it is creating an issue.

18 In the meantime, all this will boil down to  
19 more cost and maybe what WAPA had planned on for  
20 this effort, trying to come through this development  
21 area, it would seem better to take maybe some of the  
22 other routes, 2C1, 2B2, to avoid some of these  
23 impacts.

24 And then last but not least, I think it would  
25 be better to sit down and take some of the

PF.4-8, cont.

PF.4-9

PF.4-10

PF.4-11

**Comment Set PF.4, cont.**  
**SMUD Oral Public Comments**

1 information today and look at how to coordinate the  
2 alignment with the future development interests,  
3 future habitat and open space interests and try to  
4 minimize the impacts on the existing homeowners in  
5 the area.

6 Thank you very much. And we are available for  
7 questions.

8 MR. KAWAMURA: Thank you.

9 I do have a couple questions and I will turn  
10 it over to Cathy who also has some questions.

11 I do appreciate that graph; it is very  
12 helpful. In terms of the development, where are you  
13 in the process, in terms of permitting or in terms  
14 of actual construction?

15 MR. NORMAN: Right now there is a -- the  
16 City is the lead agency for the open space program  
17 that is being developed, and sphere of influence  
18 includes all Joint Visionary, which are a  
19 significant part of that.

20 In terms of permits, probably years away from,  
21 well, most definitely years away, for ever seeing a  
22 permit out here. But this kind of falls into the  
23 category of long-range planning.

24 MR. KAWAMURA: Thank you. Thank you for  
25 those comments, and thank you for that graphic.

PF.4-11, cont.

16

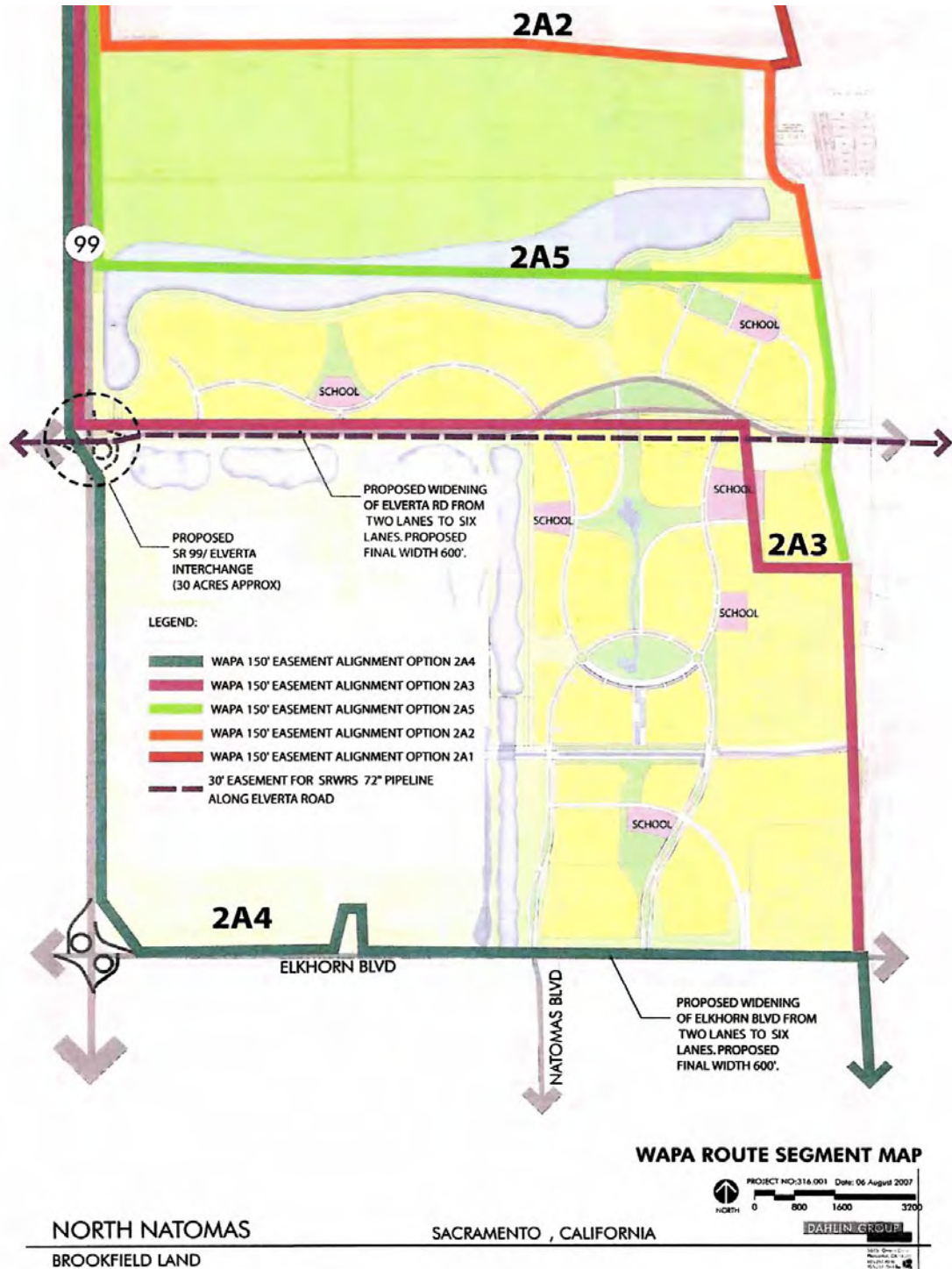
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**Comment Set PF.4, cont.  
SMUD Oral Public Comments**

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**Comment Set PF.4, cont.  
SMUD Oral Public Comments**





# Appendix B. Alternatives Comparison

**Table B-1. Summary of Proposed Project Specifications, Disturbances, and Impacts to Various Resources within the ROW**

	Total Miles	Segment Total ROW Acres	DISTURBANCE BY FACILITY/ACTIVITY												DISTURBANCE TO RESOURCES																					
			New Structures <sup>a</sup>			Access Roads <sup>b</sup>			Pulling Sites <sup>c</sup>		Material Storage <sup>d</sup>		Total Construction Acres	Total Long-Term Acres	Prime & Unique Farmland			Rice			Riverine/Riparian			Vernal pools, etc.			Emergent Wetlands			Floodplains					Planned Development	
			Number	Construction Acres	Long-Term Acres	Miles	Construction Acres	Long-Term Acres	Number	Construction Acres	No.	Construction Acres			Total Miles	Construction Acres	Long-Term Acres	Total Rice Acres	Construction Acres	Long-Term Acres	Total Acres	Construction Acres	Long-Term Acres	Total Acres	Construction Acres	Long-Term Acres	Total Acres	Construction Acres	Long-Term Acres	100-Year Total Acres	Construction Acres	Long-Term Acres	500-year Total Acres	Construction Acres	Long-Term Acres	Long-Term Acres
SEGMENT																																				
1	17.1	259.1	82	18.9	0.8	17.1	31.1	31.1	6	2.4	1	5.0	57.4	31.9	9.5	31.9	17.7	145.1	29.3	17.9	8.2	1.6	1.0	0.0	0.0	0.0	8.0	1.5	1.0	13.4	3.0	1.65	245.2	54.3	30.2	0.0
2A1-East	11.7	177.3	56	12.9	0.6	11.7	21.3	21.3	4	1.6	1	5.0	40.8	21.9	3.7	12.9	6.9	125.2	25.3	15.4	2.7	0.5	0.3	0.8	0.2	0.1	0.0	0.0	0.0	167	38.3	20.6	11.0	2.5	1.4	150.7
2A1-West	11.9	180.3	57	13.1	0.6	11.9	21.6	21.6	4	1.6	1	5.0	41.4	22.2	4.3	15.0	8.0	138.0	27.8	17.0	2.5	0.5	0.3	0.8	0.2	0.1	0.0	0.0	0.0	177	40.6	21.8	11.0	2.5	1.4	112.8
2A2-East	11.6	175.7	56	12.8	0.6	11.6	21.1	21.1	4	1.6	1	5.0	40.5	21.7	3.8	13.3	7.1	115.5	23.3	14.3	2.7	0.5	0.3	0.8	0.2	0.1	0.0	0.0	0.0	165	38.0	20.4	11.0	2.5	1.4	154.5
2A2-West	11.8	178.8	57	13.0	0.6	11.8	21.5	21.5	4	1.6	1	5.0	41.1	22.0	4.8	16.7	9.0	130.0	26.2	16.0	2.5	0.5	0.3	0.8	0.2	0.1	0.0	0.0	0.0	175	40.2	21.6	11.0	2.5	1.4	116.6
2A3-East	11.9	180.3	57	13.1	0.6	11.9	21.6	21.6	4	1.6	1	5.0	41.4	22.2	6.6	22.9	12.3	136.0	27.4	16.8	1.7	0.3	0.2	6.0	1.2	0.7	0.0	0.0	0.0	169	38.9	20.9	11.0	2.5	1.4	153.8
2A3-West	12.1	183.3	58	13.4	0.6	12.1	22.0	22.0	4	1.6	1	5.0	42.0	22.6	7.7	26.7	14.4	147.0	29.6	18.1	1.5	0.3	0.2	6.0	1.2	0.7	0.0	0.0	0.0	179	41.0	22.0	11.0	2.5	1.4	115.9
2A4-East	13.3	201.5	64	14.7	0.6	13.3	24.2	24.2	4	1.6	1	5.0	45.5	24.8	7.9	27.0	14.7	127.2	25.5	15.6	1.7	0.3	0.2	0.2	0.04	0.02	0.0	0.0	0.0	190	42.9	23.4	11.9	2.7	1.5	172.7
2A4-West	13.5	204.5	65	14.9	0.6	13.5	24.5	24.5	5	2.0	1	5.0	46.4	25.2	9.1	31.3	17.0	132.0	26.8	16.3	1.5	0.3	0.2	0.2	0.04	0.02	0.0	0.0	0.0	200	45.4	24.6	11.9	2.7	1.5	106.0
2A5-East	11.8	178.8	57	13.0	0.6	11.8	21.5	21.5	4	1.6	1	5.0	41.1	22.1	5.6	19.5	10.5	134.7	27.2	16.6	1.7	0.3	0.2	0.5	0.1	0.1	0.0	0.0	0.0	169	38.8	20.8	11.0	2.5	1.4	150.7
2A5-West	12.0	181.8	58	13.2	0.6	12.0	21.8	21.8	4	1.6	1	5.0	41.7	22.4	6.7	23.3	12.5	152.0	30.7	18.7	1.5	0.3	0.2	0.5	0.1	0.1	0.0	0.0	0.0	179	41.0	22.0	11.0	2.5	1.4	112.8
2B	9.4	142.4	45	10.4	0.5	9.4	17.1	17.1	3	1.2	1	5.0	33.7	17.5	0.3	1.1	0.6	17.6	3.5	2.2	2.6	0.5	0.3	7.9	1.5	1.0	11.4	2.2	1.4	106	25.0	13.0	2.5	0.6	0.3	26.5
2C	15.7	237.9	75	17.3	0.8	6.3	11.5	11.5	5	2.0	1	5.0	35.8	12.2	5.3	12.1	4.1	90.9	11.8	4.7	1.4	0.2	0.1	8.6	1.0	0.4	2.7	0.3	0.1	76.7	11.5	3.9	5.7	0.9	0.3	47.7
3	4.8	72.7	23	5.3	0.2	0.0	0.0	0.0	2	0.8	0	0.0	6.1	0.2	0.3	0.4	0.01	0.0	0.0	0.0	0.0	0.0	0.0	3.2	0.2	0.01	0.1	0.0	0.0	65.5	5.5	0.2	1.7	0.1	0.005	51.5

**Table B-1. Summary of Proposed Project Specifications, Disturbances, and Impacts to Various Resources within the ROW**

	Total Miles	Segment Total ROW Acres	DISTURBANCE BY FACILITY/ACTIVITY												DISTURBANCE TO RESOURCES																					
			New Structures <sup>a</sup>			Access Roads <sup>b</sup>			Pulling Sites <sup>c</sup>		Material Storage <sup>d</sup>		Total Construction Acres	Total Long-Term Acres	Prime & Unique Farmland			Rice			Riverine/Riparian			Vernal pools, etc.			Emergent Wetlands			Floodplains				Planned Development		
			Number	Construction Acres	Long-Term Acres	Miles	Construction Acres	Long-Term Acres	Number	Construction Acres	No.	Construction Acres			Total Miles	Construction Acres	Long-Term Acres	Total Rice Acres	Construction Acres	Long-Term Acres	Total Acres	Construction Acres	Long-Term Acres	Total Acres	Construction Acres	Long-Term Acres	Total Acres	Construction Acres	Long-Term Acres	100-Year Total Acres	Construction Acres	Long-Term Acres	500-year Total Acres	Construction Acres	Long-Term Acres	Long-Term Acres
ALTERNATIVE																																				
A1-East	33.6	509.1	161	37.1	1.6	28.8	52.4	52.4	12	4.8	2	10.0	104.3	54	13.5	45.2	24.7	270.3	54.6	33.3	10.9	2.1	1.3	4.0	0.4	0.1	8.1	1.6	1.0	245.5	46.8	22.4	257.9	57.0	31.6	202.2
A1-West	33.8	512.1	162	37.3	1.6	29.0	52.7	52.7	12	4.8	2	10.0	104.8	54.3	14.1	47.2	25.8	283.1	57.2	34.9	10.7	2.1	1.3	4.0	0.4	0.1	8.1	1.6	1.0	255.9	49.1	23.7	257.9	57.0	31.6	164.3
A2-East	33.5	507.6	161	37.0	1.6	28.7	52.2	52.2	12	4.8	2	10.0	104.0	53.8	13.6	45.6	24.8	260.6	52.7	32.1	10.9	2.1	1.3	4.0	0.4	0.1	8.1	1.6	1.0	244.0	46.5	22.2	257.9	57.0	31.6	206.0
A2-West	33.7	510.6	162	37.2	1.6	28.9	52.5	52.5	12	4.8	2	10.0	104.6	54.2	14.6	49.0	26.7	275.1	55.6	33.9	10.7	2.1	1.3	4.0	0.4	0.1	8.1	1.6	1.0	253.9	48.7	23.4	257.9	57.0	31.6	168.1
A3-East	33.8	512.1	162	37.3	1.6	29.0	52.7	52.7	12	4.8	2	10.0	104.8	54.4	16.4	55.2	30.1	281.1	56.8	34.6	9.9	1.9	1.2	9.2	1.4	0.8	8.1	1.6	1.0	248.2	47.3	22.7	257.9	57.0	31.6	205.3
A3-West	34.0	515.1	163	37.5	1.6	29.2	53.1	53.1	12	4.8	2	10.0	105.4	54.7	17.5	59.0	32.1	292.1	59.0	36.0	9.7	1.9	1.2	9.2	1.4	0.7	8.1	1.6	1.0	257.9	49.4	23.9	257.9	57.0	31.6	167.4
A4-East	35.2	533.3	169	38.9	1.7	30.4	55.3	55.3	12	4.8	2	10.0	108.9	56.9	17.7	59.3	32.5	272.3	54.9	33.5	9.9	1.9	1.2	3.4	0.3	0.0	8.1	1.6	1.0	269.1	51.4	25.3	258.8	57.1	31.7	224.2
A4-West	35.4	536.3	170	39.1	1.7	30.6	55.6	55.6	13	5.2	2	10.0	109.9	57.3	18.9	63.6	34.7	277.1	56.1	34.1	9.7	1.9	1.2	3.4	0.3	0.0	8.1	1.6	1.0	278.9	53.9	26.5	258.8	57.1	31.7	157.5
A5-East	33.7	510.6	162	37.2	1.6	28.9	52.5	52.5	12	4.8	2	10.0	104.6	54.2	15.4	51.8	28.2	279.8	56.5	34.5	9.9	1.9	1.2	3.7	0.3	0.1	8.1	1.6	1.0	247.6	47.2	22.7	257.9	57.0	31.6	202.2
A5-West	33.9	513.6	163	37.4	1.6	29.1	52.9	52.9	12	4.8	2	10.0	105.1	54.5	16.5	55.6	30.2	297.1	60.0	36.6	9.7	1.9	1.2	3.7	0.3	0.1	8.1	1.6	1.0	257.9	49.5	23.9	257.9	57.0	31.6	164.3
B	31.3	474.2	150	34.6	1.5	26.5	48.2	48.2	11	4.4	2	10.0	97.1	49.7	10.1	33.4	18.3	162.7	32.9	20.0	10.8	2.1	1.3	11.1	1.8	1.0	19.5	3.7	2.4	184.6	33.5	14.9	249.4	55.0	30.5	78.0
C	37.6	569.7	180	41.5	1.8	23.4	42.5	42.5	13	5.2	2	10.0	99.3	44.4	15.1	44.4	21.9	236.0	41.1	22.5	9.6	1.8	1.1	11.8	1.3	0.5	10.8	1.9	1.1	155.6	20.0	5.8	252.6	55.3	30.5	99.2
No Action	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Source: Burlison 2007

<sup>a</sup> Structure Assumptions

- Assume a new structure every 1,100 feet
- Assume 0.23 short-term acre disturbance for each structure
- Assume 0.01 long-term acre disturbance for each structure

<sup>b</sup> Access Road Assumptions

- Assume no disturbance for Segment 3 access road because it is in existing Right-of-Way
- Assume access roads parallel to transmission lines for Segments 1, 2A1, 2A2, 2A3, 2A4, 2A5, and 2B
- Assume 6.3 miles of new access road for 2C portion (9.4 miles is along existing ROW)
- Assume 15-foot width for access roads
- Assume road disturbance acres for long- and short-term = miles\*5280\*15\*width\43560

<sup>c</sup> Assume a pulling site every three miles short-term disturbance of 0.4 acre per site

<sup>d</sup> Assume materials storage yard every 15 miles and short-term disturbance of 5 acres per site

When calculating long-term and short-term disturbances to different areas, such as rice fields, either a straight ratio of farmland acreage to total acreage was used or the ratios were modified as follows:

- Prime & Unique Farmland: straight ratio of short-term and long-term disturbances
- Rice Fields: short-term disturbance does not include material storage yards, straight ratio of long-term disturbance
- Riparian: short-term does not include material storage yards and pulling sites
- Emergent Wetlands: short-term does not include material storage yards and pulling sites
- Vernal Pool: short-term does not include material storage yards and pulling sites
- Floodplains: straight ratio of short-term and long-term disturbance



## Appendix C. Environmental Protection Measures

Supplying Energy  
Preserving Reliability

**Table C-1. Sacramento Area Voltage Support Project  
Environmental Protection Measures and Monitoring Summary**

EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
1.	Air Quality	Western would adhere to all requirements of those entities having jurisdiction over air quality matters and obtain any permits needed for construction activities. Open burning of construction trash would not be allowed.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
2.	Air Quality	Project participants would use reasonably practicable methods and devices to control, prevent, and otherwise minimize atmospheric emissions or discharges of air contaminants.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
3.	Air Quality	Visible emissions from all off-road diesel-powered equipment would not exceed 40 percent opacity for more than three minutes in any one hour.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
4.	Air Quality	Equipment and vehicles that show excessive emissions of exhaust gases caused by poor engine adjustments or other inefficient operating conditions would not be operated until corrective repairs or adjustments were made.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
5.	Air Quality	Vehicles and equipment used in construction and maintenance of the proposed Project or alternatives would maintain appropriate emissions control equipment and be appropriately permitted.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
6.	Air Quality	Road construction would include dust-control measures such as watering and other approved suppressing agents for limiting dust generation.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
7.	Air Quality	Fill material storage piles would include dust-control measures such as water or chemical suppressants.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
8.	Air Quality	Ground surfaces that have been significantly disturbed would be seeded appropriately to prevent wind dispersion of soil.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

**Table C-1. Sacramento Area Voltage Support Project  
Environmental Protection Measures and Monitoring Summary**

EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
9.	Air Quality	Removal of vegetation and ground disturbance would be limited to the minimum area necessary to complete proposed Project construction activities. Vegetative cover would be maintained on all other portions of the proposed Project area.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
10.	Air Quality	Regular watering of exposed soils and unpaved access roads would be conducted during the construction period.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
11.	Air Quality	Grading activities would cease during periods of high winds (greater than 20 miles per hour averaged over 1 hour).		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
12.	Air Quality	Trucks transporting loose material would be covered or would maintain at least 2 feet of freeboard and not create any visible dust emissions.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
13.	Air Quality	Excessive engine idling will be minimized according to Placer County and City of Sacramento regulations.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
14.	Air Quality	A comprehensive inventory (e.g., make, model, year and emission rating) would be submitted to the relevant air districts of all the heavy-duty off-road equipment (50 horsepower or greater) that would be used in aggregate of 40 or more hours for the construction project. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs. At least 48 hours prior to the use of subject heavy-duty off-road equipment, the project representative shall provide the air districts with the anticipated construction timeline, including start date, name and phone number of the project manager and on-site foreman. Heavy-duty equipment would meet the standard emissions reduction of 20 percent NO <sub>x</sub> and 45 percent PM <sub>10</sub> compared to the most recent California Air Resources Board (CARB) fleet average at the time of construction.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

**Table C-1. Sacramento Area Voltage Support Project  
Environmental Protection Measures and Monitoring Summary**

EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
15.	Biological Resources	Mitigation measures developed during the consultation period under Section 7 of the Endangered Species Act (ESA) would be adhered to, as specified in the subsequent Biological Opinion of U.S. Fish and Wildlife Service (USFWS). In addition, mitigation developed in conjunction with State and Tribal authorities would be followed.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
16.	Biological Resources	Before construction and maintenance, all personnel would be instructed on the protection of cultural, paleontological, and ecological resources. To assist in this effort, the construction and maintenance contract would address applicable Federal, State, local and Tribal laws regarding collection and removal antiquities, fossils, plants, and wildlife. Training would include the importance of these resources and the purpose and necessity of protecting them.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
17.	Biological Resources	Special-status species and their habitats would be protected during post-EIS and EIR phases of the project. This may involve conducting surveys for habitat, plant, and wildlife species of concern. Where special-status species or their habitats are found, appropriate action would be taken to avoid adverse impacts on the species and/or their habitat.	Prior to the start of construction activities	Throughout the project construction period	Prior to the start of construction activities	Throughout the project construction period	WESTERN	WESTERN
18.	Biological Resources, Wetlands	A qualified biologist would conduct a site survey before clearing vegetation in sensitive habitats. The purpose of this survey would be to identify any biologically sensitive issues such as wetlands, vernal pools, or habitat of concern. Western would avoid these areas to the extent practical.	Prior to the start of construction activities	Throughout the project construction period	Prior to the start of construction activities	Throughout the project construction period	WESTERN	WESTERN
19.	Biological Resources	During construction and maintenance, no equipment refueling or oil changing would be conducted within 300 feet of any bodies of water or streams.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
20.	Biological Resources	Within riverine habitat, ROW clearing would be done by mechanical and manual methods. Construction and maintenance activities would be avoided within 100 feet of the stream bank.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN



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EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
21.	Biological Resources	Vegetation would be controlled or removed in accordance with Western's <i>Integrated Vegetation Management Environmental Guidance Manual</i> (Western 2007b).		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
22.	Biological Resources, Wetlands	Freshwater emergent, lacustrine, and riverine wetlands would be spanned and vehicular traffic would be prohibited within 100 feet of the high-water boundary of these wetlands.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
23.	Biological Resources, Wetlands	To the extent practical, when water is present, vernal pools would be driven around, spanned, or otherwise avoided.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
24.	Biological Resources	Replacing insulators on structures containing active raptor nests would be conducted after birds have fledged. Inactive nests would not be removed from structures unless they pose a safety or reliability hazard.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
25.	Biological Resources, Water Resources	Western would span the Feather River and Cross Canal riparian corridor and no construction or maintenance equipment would cross these water bodies. Sedimentation control structures would be used to prevent sediment from reaching riverine habitat.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
26.	Biological Resources, Floodplains, Water Resources, Wetlands	Hazardous materials would not be drained onto the ground or into streams or drainage areas. All construction and maintenance waste, including trash and litter, garbage, other solid waste, petroleum products, and other regulated materials, would be removed daily to a disposal facility authorized to accept such materials.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
27.	Biological Resources, Soils	At completion of work and at the request of the land owner/manager, all work areas except access roads would be scarified or left in a condition that would facilitate natural or appropriate vegetation, provide for proper drainage, and prevent erosion.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

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EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
28.	Biological Resources	Equipment would be washed prior to entering sensitive areas within the Project area to control noxious weeds. The rinse water would be disposed of through the sanitary sewage system.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
29.	Biological Resources	<u>Vernal pool resources-specific</u> . Biological reconnaissance surveys, preconstruction surveys, and other biological investigations would be conducted to identify on-site vernal pool resources. If it is determined that wetland and/or vernal pool resources occur, Western would consult USFWS. Western assumes presence of listed species in suitable vernal pools. Section 7 consultation with USFWS would determine appropriate measures to avoid and minimize loss of individuals.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
30.	Biological Resources	<u>Boggs Lake hedge hyssop and legenera-specific</u> . If preconstruction surveys determine the presence of the species, Western would consult with USFWS to determine appropriate measures to avoid and minimize loss of individuals.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
31.	Biological Resources	<u>Riparian habitat-specific</u> . If riparian vegetation requires replacement, it will be replaced at a 3:1 ratio on site or within the watershed, using native riparian trees and/or vegetation.	At the completion of project construction		At the completion of project construction	Post-construction monitoring to ensure survival	WESTERN	WESTERN
32.	Biological Resources	<u>Valley elderberry longhorn beetle-specific</u> . Surveys for beetles and elderberry host plants by a qualified biologist will be conducted prior to construction and maintenance activities. To the maximum extent practicable, the project will avoid stands of elderberry bushes and avoid isolation of elderberry bushes from other nearby plant populations	Prior to the start of construction activities			Throughout the project construction period	WESTERN	WESTERN
33.	Biological Resources	<u>Valley elderberry longhorn beetle-specific</u> . If elderberry plants cannot be avoided, and if approved by the USFWS through consultation, then transplantation/replacement mitigation measures may be implemented. Preconstruction surveys will assess the appropriate amount of mitigation.	Prior to the start of construction activities	Throughout the project construction period	At the completion of project construction		WESTERN	WESTERN

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EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
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34.	Biological Resources	<u>Western spadefoot toad-specific.</u> If preconstruction surveys determine the presence of the toad, Western would consult with USFWS to determine appropriate measures to avoid and minimize take of individuals.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
35.	Biological Resources	<u>Giant garter snake-specific.</u> Preconstruction surveys for giant garter snake would be completed by a qualified biologist approved by USFWS. If any snake habitat is found, additional measures would be implemented to minimize disturbance of habitat and harassment of the species.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
36.	Biological Resources	<u>Giant garter snake-specific.</u> Between April 15 and September 30, all irrigation ditches, canals, or other aquatic habitat would be completely dewatered, with no puddle water remaining, for at least 15 consecutive days prior to the excavation or filling in of the dewatered habitat. Efforts would be made to ensure that dewatered habitat does not continue to support prey. If a site cannot be completely dewatered, netting and salvage of prey items may be necessary.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
37.	Biological Resources	<u>Giant garter snake-specific.</u> For sites containing snake habitat, and no more than 24 hours prior to start of construction activities (site preparation and/or grading), the Project area would be surveyed for the presence of the snake. If construction activities stop on the site for a period of 2 weeks or more, a new snake survey would be completed no more than 24 hours prior to the resumption of construction activities.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
38.	Biological Resources	<u>Giant garter snake-specific.</u> Clearing would be confined to the minimal area necessary to facilitate construction and maintenance activities. Giant garter snake habitat within or adjacent to the Project would be flagged and designated as environmentally sensitive areas. This area would be avoided by all construction personnel.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

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39.	Biological Resources	<p><u>Giant garter snake-specific.</u> If a live giant garter snake is found during construction and maintenance activities, USFWS and the Project's biological monitor will be notified immediately. The biological monitor or his/her assignee shall do the following:</p> <ol style="list-style-type: none"> <li>1. Escape routes for snakes should be determined in advance of construction and maintenance and snakes should always be allowed to leave on their own.</li> <li>2. Stop construction and maintenance activities in the vicinity of the snake.</li> <li>3. Monitor the snake and allow it to leave on its own. The monitor shall remain in the area for the remainder of the workday to make sure that the snake is not harmed, or if it leaves the site, that it does not return. If a giant garter snake does not leave on its own within 1 working day, further consultation with USFWS is required.</li> </ol>		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
40.	Biological Resources	<p><u>Giant garter snake-specific.</u> If any temporary fill and/or construction debris situated near undisturbed giant garter snake habitat is to be removed between October 1 and April 30, it would be inspected by a qualified biologist to ensure the snakes are not using it as an overwintering site.</p>		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
41.	Biological Resources	<p><u>Giant garter snake-specific.</u> No plastic, monofilament, jute, or similar erosion control matting that could entangle snakes would be placed on a Project site when working within 200 feet of snake habitat. Possible substitutions include coconut coir matting, tactified hydroseeding compounds, or other material approved by USFWS.</p>		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
42.	Biological Resources	<p><u>Northwestern pond turtle-specific.</u> Take of the turtle as a result of habitat destruction during construction and maintenance activities, including maintenance and removal of irrigation ditches and drains, would be minimized by the dewatering requirements described for the giant garter snake.</p>		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

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EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
43.	Biological Resources	<u>Chinook salmon or steelhead-specific.</u> The site would be monitored to ensure that no listed fish are present and/or harmed if working in a water channel. If listed fish are present, NMFS and CDFG, if appropriate, would be consulted.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
44.	Biological Resources	<u>Western yellow-billed-specific.</u> If preconstruction surveys or other sources determine the presence of nesting birds, construction avoidance areas would be enforced for a distance of 300 feet from the nest site, until young birds have fledged and left the nesting site.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
45.	Biological Resources	<u>Bank swallow-specific.</u> Disturbances to nesting colonies would be avoided within the nesting season of May 1 through August 31, or until a qualified biologist, with concurrence of USFWS and CDFG, if appropriate, has determined that the young have fledged or the nests are no longer occupied.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
46.	Biological Resources	<u>Bank swallow-specific.</u> If preconstruction surveys identify an active nesting colony, brightly colored construction fencing will be installed 250-feet from the active nesting colony. No construction disturbances will occur within the 250-foot fenced area during the nesting season. In addition, disturbances within 0.5 mile upstream or downstream of a colony located on a natural waterway would be avoided.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
47.	Biological Resources	<u>Tricolored blackbird-specific.</u> If preconstruction surveys determine the presence of breeding and nesting birds, disturbances to nesting colonies would be avoided. A boundary shall be marked by brightly colored construction fencing establishing a 500 foot buffer from the active nest site. No disturbances would occur within the 500 foot area during the nesting season, February 1 to August 1 or while birds are present. Before the site can be disturbed, a qualified biologist, with concurrence by USFWS, would determine if the young have fledged and nest sites are no longer active.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

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EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
48.	Biological Resources	<u>Burrowing owl-specific.</u> Preconstruction surveys would be conducted prior to earth-disturbing activities to determine the presence of foraging or nesting owls. The surveys would be conducted by a qualified biologist. Results of the preconstruction surveys would be submitted to the land use agency with jurisdiction over the site prior to commencement of construction activities and a mitigation program would be developed and agreed to by the land use agency and Western prior to initiation of any physical disturbance on site.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
49.	Biological Resources	<u>Burrowing owl-specific.</u> Occupied burrows shall not be disturbed during nesting season (February 1 through August 31). No disturbance should occur within 50 meters of occupied burrows during the non-breeding season (September 1 to January 31) or within 75 meters during the breeding season (February 1 to August 31). A minimum of 6.5 acres of foraging habitat, contiguous with occupied burrow sites, would be permanently preserved for each pair of breeding burrowing owls or single unpaired resident bird.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
50.	Biological Resources	<u>Burrowing owl-specific.</u> If nests are found, USFWS and CDFG, if appropriate, would be contacted regarding suitable mitigation measures. These may include a 300 foot buffer around the nest site during the breeding season, relocation efforts for owls that have not begun egg-laying and incubation, or relocation of juveniles capable of independent survival. If on-site avoidance is required, the boundaries of the buffer zone would be determined by a qualified biologist and marked with yellow caution tape, stakes, or temporary fencing. The buffer zone would be maintained throughout the construction period. If relocation is approved by USFWS, a qualified biologist will prepare a plan for relocating the owls to a suitable site.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
51.	Biological Resources	<u>Swainson's hawk-specific.</u> A preconstruction survey would be completed to determine if active Swainson's hawk nest sites occur on or within 0.5 mile or if any	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

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EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
		Swainson's hawk nest trees would be removed on the Project site. Surveys would be conducted by experienced Swainson's hawk surveyors using Swainson's hawk Technical Advisory Committee's methods (May 31, 2000 or newer), as approved by USFWS.						
52.	Biological Resources	<u>Swainson's hawk-specific.</u> If breeding hawks are identified, no disturbances would occur within 0.5 mile of an active nest between March 15 and September 15, or until a qualified biologist, with discussion with CDFG, if appropriate, has determined that the young have fledged or the nest is no longer occupied. If an active nest site is located within 0.25 mile of existing urban development, a no-disturbance zone of 0.25 mile would be set.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
53.	Biological Resources	<u>Swainson's hawk-specific.</u> Where disturbance of a hawk nest cannot be avoided, construction would be deferred until after the nesting season. Then, if necessary, the nest tree may be removed after discussion with CDFG, if appropriate, and it has been determined that the young are no longer dependent upon the nest tree.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
54.	Biological Resources	<u>Swainson's hawk-specific.</u> If construction activities would cause nest abandonment or force out fledglings within a 0.25-mile buffer zone of the Project area, an on-site qualified raptor biologist would be assigned to the project.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
55.	Biological Resources	<u>Swainson's hawk-specific.</u> Valley oaks, tree groves, riparian habitat, and other large trees used by Swainson's hawk and other animals will be preserved wherever possible. If Swainson's hawk nest trees are lost, Western would implement mitigation planting.	Prior to the start of construction activities				WESTERN	WESTERN
56.	Biological Resources	Upon locating dead, injured or sick threatened or endangered species, the USFWS Division of Law Enforcement (2800 Cottage Way, Sacramento, CA 95825) or the Sacramento Fish and Wildlife Ecological Services Office (2800 Cottage Way, Room W 2605, Sacramento, CA 95825, telephone 916 414 6000) must		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

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		be notified within 1 working day. Written notification to both offices must be made within 3 calendar days and must include the date, time, and location of the discovery and any other pertinent information.						
57.	Cultural Resources, Paleontological Resources	Before construction, all supervisory construction personnel would be instructed by Western on the protection of cultural, paleontological, and ecological resources and that cultural resources might be presented in the study area. To assist in this effort, the construction contract would address applicable Federal and State laws regarding antiquities, fossils, plants, and wildlife, including collection and removal, and the importance of these resources and the purpose and necessity of protecting them. Contractors would be trained to stop work near any discovery and notify Western's regional environmental manager, who would ensure that the resource is evaluated and avoided. Known cultural resources would be fenced and a minimum distance maintained for work disturbances.	Prior to the start of construction activities	Throughout the project construction period	Prior to the start of construction activities	Throughout the project construction period	WESTERN	WESTERN
58.	Cultural Resources	Where ground-disturbing activities are identified, cultural resource evaluations would be done to determine the need for field inventory. Construction activities would avoid all historic properties or a special use permit or Memorandum of Agreement would be developed in consultation with the State Historic Preservation Office (SHPO). Avoidance would include the use of temporary construction fencing where activities are planned to take place near cultural resources sites boundaries.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
59.	Cultural Resources, Floodplains, Water Resources, Wetlands	Direct impacts to irrigation system and drainage canal features that are eligible for the NRHP would be avoided during the siting of new transmission line structures and access roads and most other irrigation system features would be avoided to the extent practicable in siting new structures and access roads.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
60.	Cultural Resources	Cultural resources would be considered during post-EIS phases of proposed Project implementation. Surveys would be completed to inventory and evaluate cultural	Prior to the start of construction		Prior to the start of construction		WESTERN	WESTERN



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		resources of the Preferred Alternative, or of any components that might be added to the project, or any existing components that would be modified. These surveys and any resulting property evaluation and analysis of effects would be conducted in accordance with Section 106 of the National Historic Preservation Act (NHPA) and in consultation with the SHPO.	activities		activities				
61.	Electric and Magnetic Fields	Complaints of radio or television interference generated by the transmission line will be responded to and appropriate actions taken.		During project operation period	N/A	N/A	WESTERN	WESTERN	
62.	Floodplains, Soils, Water Resources, Wetlands	Surface restoration would occur in construction areas, material storage yards, structure sites, spur roads, and existing access roads where ground disturbance occurs or where recontouring is required.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN	
63.	Floodplains, Soils, Water Resources, Wetlands	Access roads would be built at right angles to the streams and washes to the extent practicable. Culverts would be installed where needed. All construction and maintenance activities would be conducted to minimize disturbance to vegetation and drainage channels.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN	
64.	Floodplains, Soils, Water Resources, Wetlands	Excavated material or other construction materials would not be stockpiled or deposited near or on stream banks, lake shorelines, or other watercourse perimeters.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN	
65.	Floodplains, Soils, Water Resources, Wetlands	Non-biodegradable debris would be collected and removed from the ROW daily and taken to a disposal facility. Slash and other biodegradable debris would be left in place or disposed of.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN	
66.	Floodplains, Soils, Water Resources, Wetlands	All soil excavated for structure foundations would be backfilled and tamped around the foundations, and used to provide positive drainage around the structure foundations. Excess soil would be removed from the site and disposed of appropriately. Areas around structure footings would be reseeded with native plants.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN	

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67.	Floodplains, Water Resources, Wetlands	Wherever possible, new structures and access roads would be sited out of floodplains. Due to the abundance of floodplains and surface water resources in the study area, complete avoidance may not be possible and Western would consult with U.S. Army Corps of Engineers (USACE).	Prior to final design		Prior to final design		WESTERN	WESTERN
68.	Geology	Geological hazards would be evaluated during final design specification for each structure location and road construction area. Options would include avoidance of a poor site by selection of a site with stable conditions or correction of the unstable slope conditions.	Prior to final design		Prior to final design		WESTERN	WESTERN
69.	Geology, Soils	A California-registered Professional Geotechnical Engineer would evaluate the potential for geotechnical hazards and unstable slopes on the centerline route and areas of new road construction or widening on slopes with more than a 15 percent gradient.	Prior to final design		Prior to final design		WESTERN	WESTERN
70.	Health and Safety, Traffic	Conform with safety requirements for maintaining the flow of public traffic and conduct construction operations to offer the least possible obstruction and inconvenience to public transportation.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
71.	Health and Safety	Comply with all applicable health and safety laws, regulations, and standards.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
72.	Health and Safety	Post proper signage in areas within the ROW that would require temporary closure or limited access to accommodate certain land uses.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
73.	Health and Safety	Mark structures and/or shield wire with highly visible devices for identified locations, as required by applicable laws and regulations (for example, the Federal Aviation Administration regulations).		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
74.	Land Use	When weather and ground conditions permit, all construction-caused deep ruts that are hazardous to farming operations and moving equipment would be restored to preconstruction conditions or compensation would be provided as an alternative if the landowner desires.		At the completion of project construction		At the completion of project construction	WESTERN	WESTERN

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		Such ruts would be leveled, filled and graded, or otherwise eliminated in an approved manner. Ruts, scars, and compacted soils from construction activities in hay meadows, alfalfa fields, pastures, and cultivated productive lands would be loosened and leveled by scarifying, harrowing, disking, or other appropriate method. Damage to ditches, tile drains, terraces, roads and other features of the land would be corrected. The land and facilities would be restored as nearly as practicable to their original conditions.						
75.	Land Use	On completion of the work, all work areas except permanent access roads would be returned to pre-construction conditions unless otherwise specified by the land owner/ manager.		At the completion of project construction		At the completion of project construction	WESTERN	WESTERN
76.	Land Use	During construction, movement would be limited to the access roads and within a designated area in the ROW to minimize damage to agricultural land.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
77.	Land Use	Construction operations would be conducted to prevent unnecessary destruction, scarring or defacing of the natural surroundings to preserve the natural landscape to the extent practicable.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
78.	Land Use	No permanent discoloring agents would be applied to rocks or vegetation to indicate limits of survey.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
79.	Land Use	Damaged fences and gates would be repaired or replaced to restore them to their preconstruction condition.		At the completion of project construction		At the completion of project construction	WESTERN	WESTERN
80.	Land Use	Some land uses occurring within the ROW would require temporary closure or limited access. Proper signage would be posted in these areas.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
81.	Land Use	Power lines would span sensitive land uses to the extent possible. Where practical, access roads would be placed to avoid sensitive areas.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

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82.	Land Use	Where practical, construction activities would be scheduled during periods when agricultural activities would be minimally affected or the landowner would be compensated accordingly.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
83.	Land Use	Structure design and placement would be selected to reduce potential conflicts with agricultural practices and the amount of land required for transmission lines.	Prior to final design		Prior to final design		WESTERN	WESTERN
84.	Noise	All vehicles and equipment would be equipped with required exhaust noise abatement suppression devices.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
85.	Noise	Construction and maintenance activities would be consistent with local noise ordinances.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
86.	Paleontological Resources	Preconstruction surveys of sensitive paleontological areas may be conducted, as agreed upon by the appropriate land-managing agencies and Western.	Prior to the start of construction activities		Prior to the start of construction activities		WESTERN	WESTERN
87.	Socioeconomics	Any land temporarily required for construction of the proposed facilities (such as conductor pulling sites and material and equipment storage areas) would be arranged through temporary-use permits or by specific arrangements between the construction contractor and affected landowners. Arrangements would be made with business owners to avoid or minimize disruptions in their business (by posting detours and limiting the area and time of disruption).	Prior to the start of construction activities		Prior to the start of construction activities		WESTERN	WESTERN

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88.	Socioeconomics	Where new ROW is needed, Western would acquire land rights (easements) in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646), as amended. Easements would be purchased through negotiations with landowners at fair market value, based on independent appraisals. The landowner would normally retain title to the land and could continue to use the property in ways that would be compatible with the transmission line.	Prior to the start of construction activities		Prior to the start of construction activities		WESTERN	WESTERN
89.	Soils	Erosion control measures would be implemented to prevent loss of soil. Construction would be in conformance with Western's Integrated Vegetation Management Environmental Guidance Manual.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
90.	Soils	If wet areas cannot be avoided, Western would use wide-track or balloon tire vehicles and equipment and/or timber mats.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
91.	Soils, Water Resources, Wetlands	Construction vehicle movement outside of the ROW normally would be restricted to approved access or public roads.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
92.	Soils, Water Resources, Wetlands	Where feasible, all construction activities would be rerouted around wet areas while ensuring that the route does not cross sensitive resource areas.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
93.	Soils, Water Resources, Wetlands	Dewatering work for structure foundations or earthwork operations adjacent to, or encroaching on, streams or watercourses would be conducted to prevent muddy water and eroded materials from entering the streams or watercourses.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
94.	Traffic	Prior to the start of construction, Western would submit traffic control plans to all agencies with jurisdiction of public roads that would be affected by construction activities.	Prior to the start of construction activities		Prior to the start of construction activities		WESTERN	WESTERN

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EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
95.	Traffic	Western would restrict all necessary lane closures or obstructions on major roadways associated with construction activities to off-peak periods to mitigate traffic congestion and delays.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
96.	Traffic	Western would ensure that roads or sidewalks damaged by construction activities would be properly restored to their preconstruction condition.		At the completion of project construction		At the completion of project construction	WESTERN	WESTERN
97.	Visual Resources	Transmission line construction design would use monopoles whenever possible, rather than lattice structures.	Prior to final design		Prior to final design		WESTERN	WESTERN
98.	Water Resources, Wetlands	Applicable permits, agreements, and certificates for construction in jurisdictional waters or wetlands would be obtained, e.g. from the USACE or RWQCB, as needed.	Prior to the start of construction activities		Prior to the start of construction activities		WESTERN	WESTERN
99.	Water Resources, Wetlands	Culverts would be installed where needed to avoid surface water impacts during construction of transmission line structures. All construction activities would be conducted in a manner to avoid impacts to water flow.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
100.	Water Resources, Wetlands	Runoff from the construction site would be controlled and meet RWQCB storm water requirements and the conditions of a construction storm water discharge permit. A storm water pollution prevention plan would be prepared and implemented.	Prior to the start of construction activities	Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
101.	Wetlands	In areas where ground disturbance is substantial or where recontouring is required, vegetation restoration would occur.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
102.	Addenda to Biology	Western would fence sensitive resources prior to construction activities. Limited construction periods may apply to those sensitive resources identified through section 7 consultation.	Prior to the start of construction activities	Throughout the project construction period	Prior to the start of construction activities	Throughout the project construction period	WESTERN	WESTERN

**Table C-1. Sacramento Area Voltage Support Project  
Environmental Protection Measures and Monitoring Summary**

EPM	Resource	Measure	Implementation Duration		Monitoring Duration		Responsibility	
			One-time	Ongoing	One-time	Ongoing	Implementation	Monitoring
103.	Cultural Resources and/or Subsurface Remains	In the event that prehistoric archaeological resources are discovered during ground disturbing activities, all work in the vicinity of the find would be halted until such time that a qualified archaeologist is could assess the significance of the find. Western would also contact interested tribe(s) as soon as possible. If the find were determined to be legally significant by the archaeologist, or to be culturally important to a tribal community, the project representative would meet with the archaeologist and interested tribe(s) to determine the appropriate course of action.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN
104.	Cultural Resources and/or Subsurface Remains	If human remains are discovered, Western would immediately notify the county coroner to identify origin and disposition pursuant to California Public Resources Code Section 5097.98.		Throughout the project construction period		Throughout the project construction period	WESTERN	WESTERN

- CARB = California Air Resources Board
- CDFG = California Department of Fish and Game
- EPM = Environmental Protection Measures
- EIR = Environmental Impact Report
- EIS = Environmental Impact Statement
- MM = Mitigation Measure
- NBHCP = Natomas Basin Habitat Conservation Plan
- NMFS = National Marine Fisheries Service
- NRHP = National Register of Historic Places
- NO<sub>x</sub> = nitrogen oxides
- PCCP = Placer County Conservation Plan
- PM<sub>10</sub> = particulate matter equal to or less than 10 microns in diameter
- ROW = right-of-way
- RWQCB = Regional Water Quality Control Board
- SHPO = State Historic Preservation Office
- USACE = U.S. Army Corps of Engineers
- USFWS = U.S. Fish and Wildlife Service