PART G. COMMENTS

G.1 INTRODUCTION

As a result of the public comment period, over 1,100 separate comments on the Draft EIR/S were received. These comments were grouped by commenter and numbered in the order received. They are presented in this section in their entirety. For the reader's ease in locating individual comments, Table G-1 presents a list of commenters by Set Number, and Table G-2 is an alphabetical list of commenters, cross-referenced to set numbers. Table G-1 lists the name of the commenter (or commenting group) and identifies the set number in which the comments are found. This index of commenters is presented with the following group designations preceding the comment set number:

- **GP** Comment Sets from the General Public
- **OC** Comment Sets from Organizations and Citizen Groups
- **EO** Comment Sets from Elected Officials
- **PA** Comment Sets from Public Agencies
- **T** Comment Sets from Public Hearing Transcripts
  - **TA** Transcript Alturas
  - **TS** Transcript Susanville
  - **TL** Transcript Loyalton
  - **TR** Transcript Reno
- **A** Comments from Sierra Pacific Power Company (Applicant)

The reader will note that four commenter listings are actually transcripts of the public hearings in Alturas, Susanville, Loyalton, and Reno. To further assist the reader in locating comments made during the hearings, a list of individual commenters at the hearings is presented as the first item in the transcript for each hearing. Use this list to locate individual comments within the transcript. Page number references on this list to refer to the *transcript* page which appears in the upper right corner. Do not confuse this page number with the *document* page number which appears at the bottom-center position on each page.

Table G-1 Alturas Transmission Line Draft EIR/S List of Commenters

Comment Set	Commenter	No. of Comments
	General Public (GP)	
GP.1	Paul Herman	5
GP.2	James C. Hetherwick	2
GP.3	LaVerne and Robert McDonnell	1
GP.4	Barbara Williams	1
GP.5	Fred and Vivian Urbanek	1
GP.6	Patricia Williams	1
GP.7	Terry A. Trumbull	1
GP.8	Earlie and Mary Brown	6
GP.9	Mr. Armstrong	1
GP.10	Patricia Cantrall	1
GP.11	John P. Clark	1
GP.12	Louis H. Prusinovski	2
GP.13	Marie Roberts	2
GP.14	Lori Burke	73
GP.15	Patricia M. Wade	1
GP.16	Kenneth G. Lynn	1
GP.17	William L. D'Olier	3
GP.18	Irwin A. Ailara	7
GP.19	Susan M. Gross and Peter A. Cutanovk	6
GP.20	D. E. Stahl	8
GP.21	John P. Springgate	5
GP.22	George Herman	1
GP.23	Thomas G. Parnow	10
GP.24	John R. Tvrdevich	1
GP.25	Charlton Ray and Sydney A. Embry	3
GP.26	Katherine M. Kershaw	1
GP.27	Charles Hooper	1
GP.28	W. Scott and Denise A. Smiley	1
GP.29	Michael W. Hutnick	2
GP.30	Tamia Marg	1
GP.31	Ed Anderson	1
GP.32	Lesley Chace	1
GP.33	Gary A. and Lois I. Smyres	2
GP.34	Jeff Carlton	1
GP.35	Sharon Earle	1
GP.36	Dale Provost	1
GP.37	Robert L. Hess	1
GP.38	Ellen and Roger Erickson	1
GP.39	Robert C. Ryan	1

Comment Set	Commenter	No. of Comments
GP.40	William C. Thornton	1
GP.41	Thomas F. Krauel	34
GP.42	Brandon Gentry	1
GP.43	Judy and Stephen Theemis	1
GP.44	Shirley and Carl Backman	1
GP.45	Richard W. Hewitt	1
GP.46	Harrison Bardson	2
GP.47	Lea Neilson McMullen	1
GP.48	Marguerite Perez	2
GP.49	Kelle S. Ray	1
GP.50	Billy and Marlene Roberts	1
GP.51	Dave Stampanoni	4
GP.52	Elmer R. Rusco	4
GP.53	Carole L. Bohn	2
GP.54	Beverly and Edward Eastwood	1
GP.55	Edward Guiliano	1
GP.56	Doreen Orner	1
GP.57	Lottie Main	1
GP.58	Douglas Newman	1
GP.59	Kimberly Wirshing	3
GP.60	Terry Kirby	1
GP.61	Ann B. Marks	1
GP.62	Vincent Manger	1
GP.63	Larry D. Skinner	3
GP.64	Rebecca M. Zatarain	3
GP.65	Kathy Dunn	1
GP.66	Betty Schumacher	1
GP.67	La Velle Brogan	1
GP.68	John Ray	1
GP.69	Michael Fletcher and Howard Hansen	1
GP.70	William, S. Bogle	1
GP.71	Stephen G. Leonard	1
GP.72	Maureen Opperman	1
GP.73	Mariam D. Lang	1
GP.74	Tara A. and George S. Bay	1
GP.75	Ron and Debi Christenhusz	1
GP.76	Don, Joy, and Jay Anhold	7
GP.77	Camp Family	1
GP.78	Severin Balda and Maria Marsano-Balda	1
GP.79	Paul N. and Dorothy O. Reifschneider	1
GP.80	Pamela Robert	2

Comment Set	Commenter	No. of Comments
GP.81	Doug Goodall	1
GP.82	Susan Mc Clain	1
GP.83	Doug Hammerson	1
GP.84	Simons Family	1
GP.85	Jack and Jennifer Rhodes	1
GP.86	Robert E. Winchell	1
GP.87	Jesse A. and Dolores J. Castro	1
GP.88	Ronald and Rosemarie Bejcek	1
GP.89	Wes and Monique Herbst	1
GP.90	Richard Cook	1
GP.91	Roy Bogart	1
GP.92	Ken Bogart	1
GP.93	Robert and Carole Heinz	1
GP.94	Flavia S. Poole	1
GP.95	Shanna L. Britton	1
GP.96	Cathy S. Endo	1
GP.97	Ruth H. Hart	1
GP.98	Larry and Kathy Brown	1
GP.99	Tom and Lynda Grimme	1
GP.100	Dolores Ray	4
GP.101	Francis Ballard	1
GP.102	Thomas R. Anderson	2
GP.103	Mr. and Mrs. C. Wilson	1
GP.104	Jerome Byczek	6
GP.105	Craig Miller	5
GP.106	Jamie Erkiaga	1
GP.107	Carolyn Longland	1
GP.108	William S. Longland	2
GP.109	Mary Toleno	15
GP.110	Alice N. Trail	6
GP.111	Terry Click	1
GP.112	John Lundemo	1
GP.113	Mary R. Herman	1
GP.114	Elsie and Steve Pimko	2
GP.115	Jenny Booth	1
GP.116	Mary Wion	1
GP.117	Edward A. and Katherine M. Campbell	4
GP.118	Mike and Mindy Bell	1
GP.119	Robert E. Tucker	2
GP.120	Brenda Cristani	7
GP.121	Cari Lockett	2

Comment Set	Commenter	No. of Comments
GP.122	Elvira Picotte	2
GP.123	June Roberts	1
GP.124	Carolyn Kelley	1
GP.125	Rebecca Hayhurst	1
GP.126	Mike and Cathy Baldwin	1
GP.127	Steve Alastuey	3
GP.128	Stephen S. Thomas	2
GP.129	Joshua (last name illegible)	1
GP.130	Jolene Caldwell	1
GP.131	Ken and Norma Franklin	1
GP.132	Rick Delmas	7
GP.133	Sydney Smith	1
GP.134	Peggy Lear Bowen	2
GP.135	R. Mark Armstrong (Earth Engineers)	43
GP.136	Vicki L. Hughes	1
GP.137	Michael E. Dunn	1
GP.138	Gary and Junee Feero	7
GP.139	Eric Rove	1
GP.140	Karl Blahm	3
GP.141	John Williams	18
GP.142	Nick and Virginia Chorak	2
GP.143	Nancy A. Finley	3
GP.144	Frank E. Braze	5
GP.145	William P. Moyer	3
GP.146	Ken Bechtol	3
GP.147	Sheryl and Jeffrey Brown	1
GP.148	Lee Roger Anderson	21
	Organizations and Citizen Groups (OC)	
OC.1	Neighbors Opposing Power Encroachment (N.O.P.E., Gordon and Marylin Dick)	2
OC.2	N.O.P.E. (Maria R. Cantrall)	6
OC.3	Comstock Arabian Association (Bob Ramsey)	1
OC.4	Nevada All State Trail Riders (Michaele Tristram)	1
OC.5	Residents of Anderson Acres	1
OC.6	Residents of Horizon Hills	1
OC.7	Residents along Alternate Route WCFG	2
OC.8	Lassen Sportsmen Club (John R. Gaither)	1
OC.9	Long Valley area property owners (John R. Gaither)	2
OC.10	N.O.P.E. (Don Prather)	2
OC.11	N.O.P.E. (James J. Brown)	5
OC.12	N.O.P.E. (Sharon J. Brown)	3
OC.13	Friends of Peavine, Inc. (Kirk Odencrantz)	6

Comment Set	Commenter	No. of Comments
OC.14	Secret Valley Ranch property owners	2
OC.15	Form letter from residents of Reno	1
OC.16	Form letter opposing installation of substation and powerline in Long Valley	1
OC.17	Horizon Hills General Improvement District (Cari Lockett)	13
OC.18	N.O.P.E.	1
OC.19	Citizens for Preservation of Long Valley (Janet and Jerry Zebrack)	3
OC.20	Form letter regarding recreational use of Sierra County Road 570 (Jan Loverin)	1
OC.21	Boy Scouts of America, Nevada Area Council (Samuel Thompson)	1
OC.22	U.S. Hang Gliding Association, Inc. (Phillip H. Bachman)	1
OC.23	Form letter from recreational users of Toiyabe National Forest and Dog Valley	3
OC.24	Form letter regarding BLM Parcel Number 021-090-02	1
OC.25	Petition to Deny access to Sierra Pacific Power Lines on Peavine Ranch	1
OC.26	Citizen Alert (M. Lee Dazey)	5
OC.27	Idaho Power Company (Jan Packwood)	3
OC.28	Citizens for Preservation of Long Valley (Jan and Jim Loverin)	40
OC.29	California Native Plant Society (Donald Burk)	8
OC.30	Sierra Club (Allan Eberhart)	11
OC.31	Green Gulch Ranch (Thomas W. Birmingham)	10
OC.32	Residents of Bordertown (Steven F. Bus)	25
OC.33	Sports Hut	1
OC.34	Petition from Save Long Valley Coalition	1
	Elected Officials (EO)	
EO.1	U.S. Congressmen Wally Herger and John Dolittle	1
	Public Agencies (PA)	
PA.1	U.S. Department of Agriculture, Natural Resources Conservation Service	1
PA.2	County of Modoc, Road Department and Public Works Department	5
PA.3	State of California, Department of Transportation	2
PA.4	State of California, Environmental Protection Agency, Lahontan Region Water Quality Control Board	5
PA.5	Sierra County, Department of Planning and Building Inspection	15
PA.6	City of Sparks, Planning Department	3
PA.7	U.S. Department of Agriculture, Forest Service, Modoc National Forest	25
PA.8	County of Lassen, Board of Supervisors	15
PA.9	Washoe County, Department of Comprehensive Planning	5
PA.10	State of Nevada, Commission on Economic Development	1
PA.11	State of Nevada, Department of Transportation	3
PA.12	State of Nevada, Division of Water Resources	1
PA.13	U.S. Department of the Interior, Fish and Wildlife Service	14
PA.14	U.S. Environmental Protection Agency, Region IX	11
PA.15	Washoe County School District	1
PA.16	Modoc County Planning Department	19

Comment Set	Commenter	No. of Comments
PA.17	U.S. Department of Energy, Bonneville Power Administration	35
PA.18	Department of the Army, Sierra Army Depot	1
PA.19	Washoe County, Department of Parks and Recreation	1
PA.20	U.S. Department of Agriculture, Forest Service, Humboldt-Toiyabe National Forests	20
PA.21	California Energy Commission	16
PA.22	Washoe County Commission	8
PA.23	California Department of Fish and Game	119
	Public Hearing Transcripts (T)*	
TA	Alturas Public Hearing (TA=Transcript Alturas)11 sets	49
TS	Susanville Public Hearing (TS=Transcript Susanville)30 sets	30
TL	Loyalton Public Hearing (TL=Transcript Loyalton) 8 sets	20
TR	Reno Public Hearing (TR=Transcript Reno)24 sets	65
	Applicant (A)	
A.1	Sierra Pacific Power Company	180
A.2	Sierra Pacific Power Company (Amended letter)	1
TOTAL NUMBER OF COMMENTS		1291

* Each speaker has been given a set number. Please see the index at the front of each transcript for names of speakers and set numbers.

G-2 Alphabetical List of Commenters

Commenter	Comment Set
General Public (GP)	
Joshua (last name illegible)	GP.129
Ailara, Irwin A.	GP.18
Alastuey, Steve	GP.127
Anderson, Lee Roger	GP.148
Anderson, Thomas R.	GP.102
Anderson , Ed	GP.31
Anhold, Don, Joy, & Jay	GP.76
Armstrong, Mr.	GP.9
Armstrong, R. Mark	GP.135
Backman, Shirley & Carl	GP.44
Balda, Severin & Maria	GP.78
Baldwin, Mike & Cathy	GP.126
Ballard, Francis	GP.101
Bardson, Harrison	GP.46
Bay, Tara A. & George S.	GP.74
Bechtol, Ken	GP.146
Bejcek, Ronald & Rosemarie	GP.88
Bell, Mike & Mindy	GP.118
Blahm, Karl	GP.140
Bogart, Roy	GP.91
Bogart, Ken	GP.92
Bogle, William S.	GP.70
Bohn, Carole L.	GP.53
Booth, Jenny	GP.115
Bowen, Peggy Lear	GP.134
Braze, Frank E.	GP.144
Britton, Shanna L.	GP.95
Brogan, La Velle	GP.67
Brown, Larry & Kathy	GP.98
Brown, Sheryl & Jeffrey	GP.147
Brown, Earlie & Mary	GP.8
Burke, Lori	GP.14
Byczek, Jerome	GP.104
Caldwell, Jolene	GP.130
Camp, Family	GP.77
Campbell, Edward A. & Katherine M.	GP.117
Cantrall, Patricia	GP.10
Carlton, Jeff	GP.34
Castro, Jesse A. & Dolores J.	GP.87
Chace, Lesley	GP.32
Chorak, Nick & Virginia	GP.142

Commenter	Comment Set
Christenhusz, Ron & Debi	GP.75
Clark, John P.	GP.11
Click, Terry	GP.111
Cook, Richard	GP.90
Cristani, Brenda	GP.120
Cutanovk, Peter A.	GP.19
D'Olier, William L.	GP.17
Delmas, Rick	GP.132
Dunn, Kathy	GP.65
Dunn, Michael E.	GP.137
Earle, Sharon	GP.35
Eastwood, Beverly & Edward	GP.54
Embry, Sydney A.	GP.25
Endo, Cathy S.	GP.96
Erickson, Ellen & Roger	GP.38
Erkiaga, Jamie	GP.106
Feero, Gary & Junee	GP.138
Finley, Nancy A.	GP.143
Fletcher, Michael	GP.69
Franklin, Ken & Norma	GP.131
Gentry, Brandon	GP.42
Goodall, Doug	GP.81
Grimme, Tom & Lyndra	GP.99
Gross, Susan M.	GP.19
Guiliano, Edward	GP.55
Hammerson, Doug	GP.83
Hansen, Howard	GP.69
Hart, Ruth H.	GP.97
Hayhurst, Rebecca	GP.125
Heinz, Robert & Carole	GP.93
Herbst, Wes & Monique	GP.89
Herman, Paul	GP.1
Herman, Mary R.	GP.113
Herman, George	GP.22
Hess, Robert L.	GP.37
Hetherwick, James C.	GP.2
Hewitt, Richard W.	GP.45
Hooper, Charles	GP.27
Hughes, Vicki L.	GP.136
Hutnick, Michael W.	GP.29
Kelley, Carolyn	GP.124
Kershaw, Katherine M.	GP.26
Kirby, Terry	GP.60
Krauel, Thomas F.	GP.41

Commenter	Comment Set
Lang, Mariam D.	GP.73
Leonard, Stephen G.	GP.71
Lockett, Cari	GP.121
Longland, William S.	GP.108
Longland, Carolyn	GP.107
Lundemo, John	GP.112
Lynn, Kenneth G.	GP.16
Main, Lottie	GP.57
Manger, Vincent	GP.62
Marg, Tamia	GP.30
Marks, Ann B.	GP.61
McClain, Susan	GP.82
McDonnell, LaVerne & Robert	GP.3
McMullen, Lea Neilson	GP.47
Miller, Craig	GP.105
Moyer, William P.	GP.145
Newman, Douglass	GP.58
Opperman, Maureen	GP.72
Orner, Doreen	GP.56
Parnow, Thomas G.	GP.23
Perez, Marguerite	GP.48
Picotte, Elvira	GP.122
Pimko, Elsie & Steve	GP.114
Poole, Flavia S.	GP.94
Provost, Dale	GP.36
Prusinovski, Louis H.	GP.12
Ray, Kelle S.	GP.49
Ray, Charlton	GP.25
Ray, Dolores	GP.100
Ray, John	GP.68
Reifschneider, Paul N. & Dorothy O.	GP.79
Rhodes, Jack & Jennifer	GP.85
Robert, Pamela	GP.80
Roberts, Billy & Marlene	GP.50
Roberts, June	GP.123
Roberts, Marie	GP.13
Rove, Eric	GP.139
Rusco, Elmer R.	GP.52
Ryan , Robert C.	GP.39
Schumacher, Betty	GP.66
Scott, W.	GP.28
Simons, Family	GP.84
Skinner, Larry D.	GP.63
Smiley, Denise A.	GP.28

Commenter	Comment Set
Smith, Sydney	GP.133
Smyres, Gary A. & Lois I.	GP.33
Springgate, John P.	GP.21
Stahl, D. E.	GP.20
Stampanoni, Dave	GP.51
Theemis, Judy & Stephen	GP.43
Thomas , Stephen S.	GP.128
Thornton, William C.	GP.40
Toleno, Mary	GP.109
Trail, Allice N.	GP.110
Trumbull, Terry A.	GP.7
Tucker, Robert E.	GP.119
Tvrdevich, John R.	GP.24
Urbanek, Fred & Vivian	GP.5
Wade, Patricia M.	GP.15
Williams, Patricia	GP.6
Williams, Barbara	GP.4
Williams, John	GP.141
Wilson, Mr. & Mrs. C.	GP.103
Winchell, Robert E.	GP.86
Wion, Mary	GP.116
Wirshing, Kimberley	GP.59
Zatarain, Rebecca M.	GP.64
Organizations and Citizen Groups (OC)	
Boy Scouts of America, Nevada Area Council (Samuel Thompson)	OC.21
California Native Plant Society (Donald Burk)	OC.29
Citizen Alert (M. Lee Dazey)	OC.26
Citizens for Preservation of Long Valley (Jan and Jim Loverin)	OC.28
Citizens for Preservation of Long Valley (Janet and Jerry Zebrack)	OC.19
Comstock Arabian Association (Bob Ramsey)	OC.3
Form letter from recreational users of Toiyabe National Forest and Dog Valley	OC.23
Form letter from residents of Reno	OC.15
Form letter opposing installation of substation and powerline in Long Valley	OC.16
Form letter regarding BLM PArcel Number 021-090-02	OC.24
Form letter regarding recreational use of Sierra County Road 570 (Jan Loverin)	OC.20
Friends of Peavine, Inc. (Kirk Odencrantz)	OC.13
Green Gulch Ranch (Thomas W. Birmingham)	OC.31
Horizon Hills General Improvement District (Cari Lockett)	OC.17
Idaho Power Company (Jan Packwood)	OC.27
Lassen Sportsmen Club (John R. Gaither)	OC.8
Long Valley area property owners (John R. Gaither)	OC.9
N.O.P.E.	OC.18
N.O.P.E. (Don Prather)	OC.10
N.O.P.E. (James J. Brown)	OC.11

Commenter	Comment Set
N.O.P.E. (Maria R. Cantrall)	OC.2
N.O.P.E. (Sharon J. Brown)	OC.12
Neighbors Opposing Power Encroachment (N.O.P.E., Gordon and Marylin Dick)	OC.1
Nevada All State Trail Riders (Michaele Tristram)	OC.4
Petition from Save Long Valley Coalition	OC.34
Petition to Deny access to Sierra Pacific Power Lines on Peavine Ranch	OC.25
Residents along Alternate Route WCFG	OC.7
Residents of Anderson Acres	OC.5
Residents of Bordertown (Steven F. Bus)	OC.32
Residents of Horizon Hills	OC.6
Secret Valley Ranch Property Owners	OC.14
Sierra Club (Allan Eberhart)	OC.30
Sports Hut	OC.33
U.S. Hang Gliding Association, Inc. (Phillip H. Bachman)	OC.22
Elected Officials (EO)	
U.S. Congressmen Wally Herger and John Dolittle	EO.
Public Agencies (PA)	
California Department of Fish and Game	PA.23
California Energy Commission	PA.21
City of Sparks, Planning Department	PA.6
County of Lassen, Board of Supervisors	PA.8
County of Modoc, Road Department and Public Works Department	PA.2
Department of the Army, Sierra Army Depot	PA.18
Modoc County Planning Department	PA.16
Sierra County, Department of Planning and Building Inspection	PA.5
State of California, Environmental Protection Agency, Lahontan Region Water Quality Control Board	PA.4
State of California, Department of Transportation	PA.3
State of Nevada, Commission on Economic Development	PA.10
State of Nevada, Department of Transportation	PA.11
State of Nevada, Division of Water Resources	PA.12
U.S. Department of Agriculture, Forest Service, Humboldt-Toiyabe National Forests	PA.20
U.S. Department of Agriculture, Natural Resources Conservation Service	PA.1
U.S. Department of Arriculture, Forest Service, Modoc National Forest	PA.7
U.S. Department of Energy, Bonneville Power Administration	PA.17
U.S. Department of the Interior, Fish and Wildlife Service	PA.13
U.S. Environmental Protection Agency, Region IX	PA.14
Washoe County Commission	PA.22
Washoe County School District	PA.15
Washoe County, Department of Comprehensive Planning	PA.9
Washoe County, Department of Parks and Recreation	PA.19

Commenter	Comment Set
Public Hearing Transcripts (T)*	
Alturas Public Hearing	TA=Transcript (Alturas)
Loyalton Public Hearing	TL=Transcript (Loyalton)
Reno Public Hearing	TR=Transcript (Reno)
Susanville Public Hearing	TS=Transcript (Susanville)
Applicant (A)	
Sierra Pacific Power Company	A.1
Sierra Pacific Power Company (Amended letter)	A.2

* Each speaker has been given a set number. Please see the index at the front of each transcript for names of speakers and set numbers.

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GP

COMMENTS FROM THE GENERAL PUBLIC

Draft EIR/S Comment Sheet _____ 5/6/95

Proposed Alturas Transmission Line

General Public Comment Set 1

Name: Paul Herman

Affiliation: Property owner

Address:

City: State: ZIP:

Phone: ( ) CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

Need a complete, descriptive explanation of wheeling. (GP. 1-1)

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Paul Herman
Star Route
Doyle, CA 96109

RECEIVED JUN 0 5 1995

Julie Halligan / Peter Humm, CPUC / BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

June 1, 1995

Dear Ms. Halligan and Mr. Humm:

I am writing to comment on the environmental impact report/statement for the proposed Alturas transmission line project, CPUC Application #93-11-018, BLM Case #CACA-31406.

First, thank you for the opportunity to comment. I want the BLM and CPUC to choose the "no action" alternative and deny Sierra Pacific's request for easements on public land. I object to Sierra Pacific's stated reasons for building the line in the first place. SPPCo contends this line is needed to provide more dependable power to the Reno area. In my scoping letter I specifically asked for examples of how the proposed new transmission line could have prevented any power outage that has affected SPPCo's service area. I have received no answer to that specific question in the EIR/S or anywhere else. I also asked for a summary of the potential use of this project for "wheeling" or wholesale electricity trading by SPPCo. The answer on page A-22 of the Main Document Volume 1, "This attribute of the project is predicted to offer economic benefits." is wholly inadequate. Further, on page A-31 the document states "The value of these services has not been estimated." With all due respect, this is a BIG FAT LIE. Am I expected to believe, and do you believe, that SPPCo is preparing to spend over $120,000,000 on a power line for which they have no estimate of potential profits from "wheeling"? Pacific Gas and Electric Co. of Northern California makes more profit on wheeling than they do on their residential customers. These answers are an insult to intelligent people and should not be accepted by the BLM and CPUC. I think this proposed power line is MAINLY a tool for wheeling and SPPCo is trying to disguise it as a public service. The truth is that SPPCo is in the business of making money and public service has very little to do with it. I have no problem with them making money, but when they require the forfieture of over 20 square miles of public land (165 miles X 660 ft.) and the spoiling of environmental values and scenery over many hundreds of square miles then it is time for us to say "NO" very loudly. The application should be denied. (GP. 1-2)

If the BLM and CPUC determine that the construction of this line is "in the public interest" then I would urge them to require SPPCo to give more serious consideration to the Nevada Alternative. Many years ago, as part of long-term land use planning, the Federal Government gave western power companies, free of charge, huge swaths of land to be used as power transmission corridors. These corridors are located where the power companies requested them. One corridor goes straight down the length of Nevada and is utilized by LA Dept. of Water and Power for a 1000 KV line. SPPCo could utilize this corridor for their transmission needs but have rejected it on the grounds that it would impact too many people in Sparks, part of their service area. Nowhere have I heard discussion of coming into the Reno area via the Silver Lake Substation or by burying the cables through more densely populated areas. The EIR/S does not adequately address alternatives. SPPCo carefully set up all the alternatives they want us to know about and just as carefully shot them down, claiming there are no more. I believe there are many (GP. 1-3)

pg. 2

additional alternatives which should all be considered.

In my scoping letter I requested a realistic assessment of conservation as a method of obtaining new power resources. SPPCo gave this alternative only a cursory dismissal. It has been common knowledge for many years that conservation is the most cost effective method of providing additional power. Instead of acquiring more public land SPPCo should implement a serious conservation program within its service area. SPPCo should state how many dollars they spend on conservation programs in their service area and what percentage of their budget this represents. GP. 1-3

If the CPUC and BLM find that the proposed route is indeed "environmentally superior" I urge elimination of the Long Valley portion of the line and its removal to the east side of Petersen Mountain. Here I refer to where the proposed line re-enters California in the Dry Valley area and proceeds south to the proposed Bordertown substation. The Long Valley area has abundant and unique scenic and wildlife values which would be severely damaged by a power line of this size. Extensive wetland areas associated with Long Valley Creek support a large variety of wildlife and provide scenic beauty to residents and travelers alike. These values will be permanently destroyed if SPPCo is allowed to have their way with Long Valley. There are far fewer biological resources at risk in the more eastern alternatives. Waterfowl, hawks, eagles, deer, antelope and other wildlife are much less common to the east as the land becomes more arid. Visual resources are high in the east but a power line in the vicinity of the 395 corridor will offend thousands of people daily. The more eastern route would also stay within SPPCo's service area, damage the environment of those they allege to "serve" instead of their less fortunate neighbors outside the service area in California. Why (this one is for you, CPUC) should Californians be forced to sacrifice our environment to enable a Nevada based power company to further profit, a sacrifice which would not benefit us in any conceivable way? SPPCo should be directed back into its own service area and told to STAY THERE!

If the BLM and CPUC decide to give SPPCo a transmission corridor in Long Valley, I would request that the power line be aligned in the straightest route possible. Specifically, I prefer alternative T over alternative S & U. According to the comparison of alternatives (page D-5), the only major advantage stated for the use of S & U is visual resources. I challenge the wisdom of this decision. Though alternative T would be destructive to the scenic values of the Lassen Red Rocks Scenic Area, the havoc caused by alternative S & U would be catastrophic. S & U would cross over the 395 Highway corridor *twice*, The Long Valley Creek wetlands and riparian area *twice*, Scott Road (Lassen Co. Rd. 333B) *twice*, and the Union Pacific Railroad *twice*. In addition, it would completely ruin the rare scenic values of Long Valley Creek and many spectacular views of the Sierra Nevada escarpment. From a desk in Carson City, in its bureaucratic boneheadedness, the BLM has declared the Red Rocks area more scenic than all the rest of Long Valley. Why is the BLM willing to sacrifice the rest of the valley completely in order to preserve one small area that has been declared scenic? Alternative T, though a bad thing in itself, is far less damaging than S & U. The Red Rocks are indeed scenic, but after living in the area for many years, I find my eyes are drawn to the water, the beaver ponds with their abundant waterfowl and the greenery adjacent to the creek. Finding a worse place to build a major power line would be difficult. GP. 1-4

According to the comparison of alternatives (page D-5) all of the following areas are more adversely affected by S & U: Air quality, biological resources, cultural resources, energy and utilities, geology, soils and paleontology, hydrology, transportation and traffic. The areas of biological resources, cultural resources, and transportation and traffic are all considered major disadvantages in alternative S & U. According to maps P-4 and S-1, the

pg. 3

S & U alternative would cross over almost a mile of wetlands. Wires over wetlands constitute a major aerial collision hazard for waterfowl and raptors. It should be clear that wetlands in this part of the country are a rare and disappearing resource. Though not noted in the document, the western-most loop of alternative S & U also disturbs an important deer winter range. GP. 1-4

The BLM, in its bureaucratic boneheadedness has declared the Red Rocks area more scenic than all the rest of Long Valley, a decision made from a desk in Carson City. Why is the BLM willing to sacrifice the rest of the valley completely in order to preserve one small area that has been "declared" scenic? Alternative T, though not a good thing in itself, is far less damaging than S & U.

I urge you to choose the NO ACTION alternative. Large utilities are capable of making huge profits without handouts of free land from our government. We have already given them transmission corridors all over the west and if SPPCo needs an easement they should use existing ones and be thankful, not avariciously grab for more. If SPPCo is allowed to come through the Honey Lake Valley, then they should be made to stay in their service area once they have entered it. If they come through Long Valley they should be prevented from making a total mess of the creek, wetlands and highway. GP. 1-5

Again, I thank you for the opportunity to comment and hope you will give thoughtful consideration to my concerns.

Sincerely,

Paul Herman

Paul Herman

CC: BRUCE BABBIT

Draft EIR/S Comment Sheet RECEIVED MAR 17 1995

Proposed Alturas Transmission Line

General Public Comment Set 2

Name: JAMES C HETHERWICK
Affiliation: INTERESTED CITIZEN
Address: P.O. BOX 1305
City: ALTURAS State: CA ZIP: 96101
Phone: (916) 233-2194 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

IT IS A SHAME YOU WANT TO RUN OUR BEAUTIFUL COUNTY WITH YOUR POWER LINES. WE HAVE UNBELIEVABLE VIEWS OF OUR MOUNTAINS, FOREST AND DESERTS WITH NO OBSTRUCTIONS. I REALIZE IT IS MONEY IN YOUR POCKETS, BUT AT SAME TIME IT DE-VALUES OUR PROPERTIES. I KNOW, YOU SAY THERE IS NO PROBLEM WITH THE EFFECTS OF MAGNET FIELDS ON LIVESTOCK, WILDLIFE, PLANTS AND PEOPLE, BUT YOU ARE NOT SURE. IT IS GOING TO HURT OUR ECONOMY IN DIFFERENT WAYS. ONE, THERE ARE RETIRED PEOPLE WHO WERE GOING TO MOVE UP HERE BUT ARE HOLDING OFF UNTIL THIS IS SETTLED. IF YOU PUT THE LINE IN, THEY WILL NOT MOVE UP. I REALIZE YOU PEOPLE LIVE WHERE YOU DON'T HAVE TO SEE IT, BUT WE WILL SEE IT EVERY DAY EVERYWHERE WE GO, WHEN WE GO FOR A RIDE, FISHING, CAMPING OR WHAT EVER, YOU WILL HAVE YOUR WORK DONE AND GONE. WHAT YOU WILL DO TO THE RANCHS, FARMS, PRIVATE CABINS WILL BE A BIG LOSS TO OUR COUNTY. IF A PERSON HAS A PIECE OF LAND AND WANTS TO SELL IT AND YOU HAVE POWER LINE ON IT, HE CAN'T SELL IT BECAUSE NO BODY WANTS A PIECE OF PROPERTY WITH A POWER LINE RUNING THRU IT.

THERE IS NO REASON WHY YOU CANT GO A FEW MILES OVER AND PUT IT IN THE NEVADA DESERT. YOU WANT RUN NEAR THE ENVIRONMENT AND IT IS A STRAIGHT SHOT TO RENO, THATS WHERE YOU SAY YOU WANT TO GO. YOU SAY IT WILL COST TOO MUCH MONEY, YOU AREN'T THINKING ABOUT WHAT IT WILL COST THE PROPERTY OWNERS IN LOSS OF VALUE. YOU CAN GAIN YOUR LOSS BACK OVER A PERIOD OF TIME THE PROPERTY OWNER LOSES HIS PERIOD. DON'T RUN OUR FOREST AND COMMUNITY WITH YOUR LINE OF CRAP.

GP. 2-1

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet RECEIVED APR 24 1995

Proposed Alturas Transmission Line

Name: JAMES C HETHERWICK
Affiliation: CONCERN CITIZEN
Address: P.O. BOX 1305
City: ALTURAS State: CA ZIP: 96101
Phone: ( ) CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

I THINK THE ROUTE DOWN NEVADA TO RENO SHOULD REALLY BE CHECKED OUT, MAINLY BECAUSE THE LAND VALUES BY TAKING THRU NEVADA ARE NIL COMPARED TO THE LAND VALUES THRU MODOC. IT WILL NOT DROP THE THE LAND VALUES DROWN NEVADA LIKE IT WILL THRU MODOC. IT WILL BANKRUPT SOME PEOPLE BECAUSE IT WILL RUIN THE VALUE OF THEIR LAND AND THEY COULDNT SELL IT FOR WORTH IT IS ORIGINALLY WORTH. YOU PEOPLE DON'T THINK WHAT IT WILL DO TO THE LAND OWNERS, THE ONLY THING YOU PEOPLE THINK ABOUT IS HOW MUCH $'s YOU WILL MAKE. YOU HAVE NO FEELINGS FOR YOUR FELLOW MAN, THE ONLY THING YOU WORSHIP IS THE ALMIGHTY $. IF YOU REALLY CARED FOR PEOPLE YOU WOULD LOOK AT THE ROUTE DOWN NEVADA, MAY BE A FEW MILES LONG BUT LESS EXPENSIVE TO CLEAR THE RIGHT-A-WAY. YOU SAY IT WILL BRING X AMOUNT OF DOLLARS TO THE TAX ROLL, MIGHT BE, BUT LOOK WILL THE LAND OWNERS WILL LOOSE. THE TAX DOLLARS WANT HELP THEM A BIT, IF THE POWER LINE PUTS HIM OUT OF BUSINESS OR RUINS HIS LAND. LOOK AT ALL THE PLANTS, WILDLIFE, AND SCENERY YOUR POWER LINE WILL DESTROY, JUST FOR A FEW DOLLARS THEN YOU WILL LEAVE AND WE WILL BE STUCK FOR LIFE WITH ONLY AN EYESORE. WHY RUIN A BEAUTIFUL COUNTY LIKE MODOC FOR A FEW DOLLARS IN YOUR POCKET WHEN WE DON'T EVEN NEED THE POWER. IF RENO NEEDS IT, THAN NEVADA SHOULD HAVE THE NEW ROUTE, NOT MANY PEOPLE WILL SEE IT THRU NEVADA, BUT WE WILL ALL SEE IT IN MODOC. IT WILL GREATLY HURT OUR ECONOMY IN LOTS OF WAYS. WE HAVE MORE TO LOOSE THAN TO GAIN. THINK ABOUT PEOPLE FOR CHANGE INSTEAD OF THE ALMIGHTY $.

GP. 2-2

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED
MAR 17 1995

PO Box 1763
Cambria, CA 93428
March 15, 1995

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

General Public Comment Set 3

Please consider the following comments on the Alturas Transmission Line Project per CPUC App. No. 93-11-018, and also BLM App. CACA-31406.

We believe that Proposed Segment Q should be selected, rather than Alternative P, since Alternative P has major disadvantages compared to Proposed Segment Q. Some of these disadvantages are:

the scenic degradation of the region around Doyle and the west side of the Fort Sage Mountains

the impact on the Doyle Wildlife Area

the smaller parcels of private land along Alternative P - due to the small size, the owners and users can not readily avoid the impacts of the transmission line

the greater population to be affected along Alternative P as compared to that along Proposed Segment Q

Therefore, please select Proposed Segment Q. Thank you for your consideration.

GP. 3-1

Sincerely,

LaVerne McDonnell

Robert McDonnell

Barbara Williams
Star Route Box 1
Chilcoot, Ca. 96105
916-993-4133
March 15,1995

General Public Comment Set 4

Ms. Julie Halligan
Project Manager, CPUC
505 Van Ness Ave.
San Francisco, Ca. 94102-3298

Dear Ms. Halligan,

As residents of Long Valley, in southern Lassen County, we would like to express concern about the plans for the S.P.P.C. power line, proposed to run from Alturas to Reno, Nv.

We are concerned about why the existing corridor is not being used; the close proximity to private homes this route will take and the health hazards this creates; and the disruption to wildlife and the environment.

In this age, with the population and all associated structures exploding, we must respect and treat with care the unspoiled land we have remaining. To open a new utilities corridor when there is an existing corridor in reasonable proximity seems to be an unjustifiable degradation of our land. This land is becoming increasingly scarred with criss-crossing utility lines and clutter. It would seem that if properly planned the utility corridors would be organized together, leading to less land defacing and more efficient servicing and accessing of these lines.

Fifty percent of this proposed new corridor runs through or adjacent to private property. As property owners directly involved (the line would run next to our property line), we are extremely concerned that we were never notified by the C.P.U.C. of this proposed line. A highly inconsiderate omission considering the impact such a line will have on us. We are very concerned about the health effects from the electromagnetic field (EMF) this line will produce. We understand this is an area of science still being studied, but preliminary statistics show a SIGNIFICANT increase in cancers, especially childhood cancers, directly related to being in the proximity of the EMF's these lines produce. Not to mention the visual impact and property devaluation these lines will produce. With an existing corridor so nearby, how can you justify creating this new corridor and running 50% of it by private property knowing the negative impacts it will have on so many lives? GP. 4-1

It is known that these utility corridors disrupt the habitat and migratory patterns of much wildlife. Again, with an existing corridor so nearby, how can you justify another one?

In closing, we would like to ask you to reconsider this new line proposal for the sake of all the people it will negatively impact. It would be unique to see a company put the benefits of the people before those of itself.

Sincerely,
Barbara J Williams

Draft EIR/S Comment Sheet RECEIVED MAR 1 8 1995

Proposed Alturas Transmission Line

Name: FRED AND VIVIAN URBANEK

Affiliation:

Address: HC 4 BOX 42511

City: ALTURAS State: CA ZIP: 96101

Phone: (916) 233-4886 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

General Public Comment Set 5

I REALIZE THAT PROTESTS FROM THE LITTLE PEOPLE, AGAINST THIS TRANSMISSION LINE, ARE MOST LIKELY NOT BEING CONSIDERED, BUT I FEEL IT WORTH MY TIME ANYWAY.

THIS TRANSMISSION LINE WILL BE NOISY, UNSIGHTLY, AND A POTENTIAL HEALTH HAZARD. WHY SIERRA PACIFIC IS FIGHTING THE USE OF THE ESTABLISHED ROUTE THAT GOES THROUGH WESTERN NEVADA IS NOT CLEARLY UNDERSTOOD. IT APPEARS, FROM LITERATURE THAT I HAVE READ, THAT VARIOUS ENVIRONMENTAL GROUPS FAVOR THE NEVADA ROUTE. WHY AREN'T THE WISHES OF THESE "TREE HUGGER" GROUPS BEING FOLLOWED. NORMALLY THE VARIOUS GOVERNMENTAL AGENCIES BEND OVER BACKWARDS TO LEFT WING WISHES OF GROUPS SUCH AS SIERRA CLUB, AUDUBON SOCIETY, ETC.

GP 5-1

MAYBE THIS COULD ALL BE SUMMED UP CORRECTLY IF YOU LOOK AT THE LETTERS IN THE BLM CASE NUMBER - CACA - THE SPANISH INTERPRETATION OF THIS IS VERY RIGHT ON.

Fred Urbanek

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

3-14-95.

RECEIVED MAR 27 1995

Draft EIR/S Comment Sheet RECEIVED MAR 27 1995

Proposed Alturas Transmission Line

General Public Comment Set 6

Name: PATRICIA WILLIAMS
Affiliation: ? Tenant in area
Address: 202 Lenco Ave.
City: Reno State: Nv ZIP: 89506
Phone: ( ) CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

I propose NO PROJECT. There are too many issues that cannot be mitigated. It is also traditional that all costs of building, rebuilding, maintaining and operating connected to "Public" Utilities is paid for by the customer.

I live in the country because I need the quiet. I hike all over Pointe Mtn. Sheep graze there. I see deer, hundreds of birds, aspen groves, wild flowers. I am also a photographer. This project would ruin all of that.

This project covers Indian lands, wild life habitat, religious & cultural lands etc etc. You acknowledge that all of these, including disrupting the beauty, is disgraceful & not valid. Condemning private property for this use is unacceptable.

GP 6-1

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED APR 07 1995

THE
TRUMBULL LAW FIRM
1011 LINCOLN AVE., PALO ALTO, CA 94301-3046
Phone (415) 321-3627 Fax 321-3958

ENVIRONMENTAL LAW AND LAND USE

General Public Comment Set 7

March 30, 1995

Julie Halligan
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St.
Suite 218
Agoura Hills, CA 91301

Subject: Alturas Transmission Line EIR

Dear Ms. Halligan:

The proposed transmission line goes thru my properties and Sierra Pacific is not willing to offer me fair compensation. Accordingly, I am opposed to the project. Please send me a copy of Executive Summary.

My address and name are incorrect in the PUC records. Could you have them corrected please? To assist you in this effort, I have enclosed the old mailing label with my name misspelled and the incorrect address. GP. 7-1

Thank you for your assistance,

Terry A. Trumbull

TERRY A. TRUMBULL, NAOMI S. ROSEN

Environmental Section

General Public Comment Set 8

2
RE: ALTURAS INTERTIE
CPUC #A93-11-018
We don't Sie
Donot want Sie
land, a
To Whom It May Concern:
We understa
We received information through the grape-vine, that there has been another BLM Case No. A93-11-018 hearing; which we didnot receive notice. We still have the same objections as RE: BLM Case No. CACA-31406 and the Alturas Interies Project. (GP. 8-1)
will be
First, we oppose to having a large power line on or near the property we purchased and have plans for retirement. With power line with 345 thousand volts will result in the following:
Sierra Pacific only concern is
1. A degradation of our environment measured by:
a. decreased aesthetics: The line will alter the visual aspect of one of the few remaining pristine areas in California.
b. Significant impact on our wild life.
c. endangerment to our property, people living, camping or visiting the area.
d. From anchor points of the towers; a possible ground water disruption.
e. Many other factors; which was mentioned at the meeting, May 17, 1994, in Susanville, California.
2. Health hazards:
a. The use of electric blankets have been researched and linked to Cancer and birth defects. People living in the area, campers and vistors. (GP. 8-2)
3. disruption of agriculture, future agriculture, irrigation and air spray.
4. Our plans would be completely distroyed and also our neighbors. It would be a health hazard to all of us.
5. A new utility corridor, near a gas line? This is an invitation for an explosion and can cause environmental damage to property; including injury and loss of life. Can sierra Pacific guarantee this will not happen? Are they, Sierra Pacific, going to accept the responsibility for all the above and what ever happen linking the power line to? (GP. 8-3)
6. A financial loss:
Is Sierra Pacific going to compensate everyone for all the plans they have for their property. Which include structure and what the plans will produce for the future? (GP. 8-4)

We have submitted our plans for our property to Sierra Pacific, which is included in our retirement plans financially. Is Sierra Pacific willing to accommodate us and everyone financially or just push their project through by using "Eminent Domain" and throw pennies to everyone. Sierra Pacific can take a different route, which would not interfer with private landowners property. Why don't Sierra Pacific take another route? We, the people, donot want Sierra Pacific to tread on us. We do not want the land, animals and the scenery in the area distroyed. (GP. 8-4)

We understand that Sierra Pacific is considering running their power line along the corridors in the back of our property(landowners), including ours. We do not want 345 volt that close to our property. We understand the reason they, Sierra Pacific, want to use the route they have chosen is because Lassen County will be building a school in the area. Therefore, Sierra Pacific wants the power line to in the required distance from the school. Will the students and staff be safe? (GP. 8-5)

Sierra Pacific only concern is theirs. They want to get what they can for as little as possible. They have not discussed or offered to compensate any of us. They want to take advantage of all of us by using the term "eminent domain" to enter landowners properties to facilitate for them. Sierra Pacific wants to capitalize on private landowners.

Are we the property owners going to be stock holders in Sierra Pacific and receive dividends along with other stockholders? Are we going to be able to be compensated for the property we, the landowners, own; which we will never be able to benefit from? If our (Earlie & Mary Brown) cost us the sum of $380 thousands dollars, is Sierra Pacific going to compensate us for this amount? All Sierra Pacific is concern about is the power they want to supply Nevada. Even, if they agree to supply home owners and landowners electrical power, it will not be safe for anyone to live in the area. Life will be in endangement; wildlife will be destroyed and all the soil will be contaminated and will not be of use to any of us. (GP. 8-6)

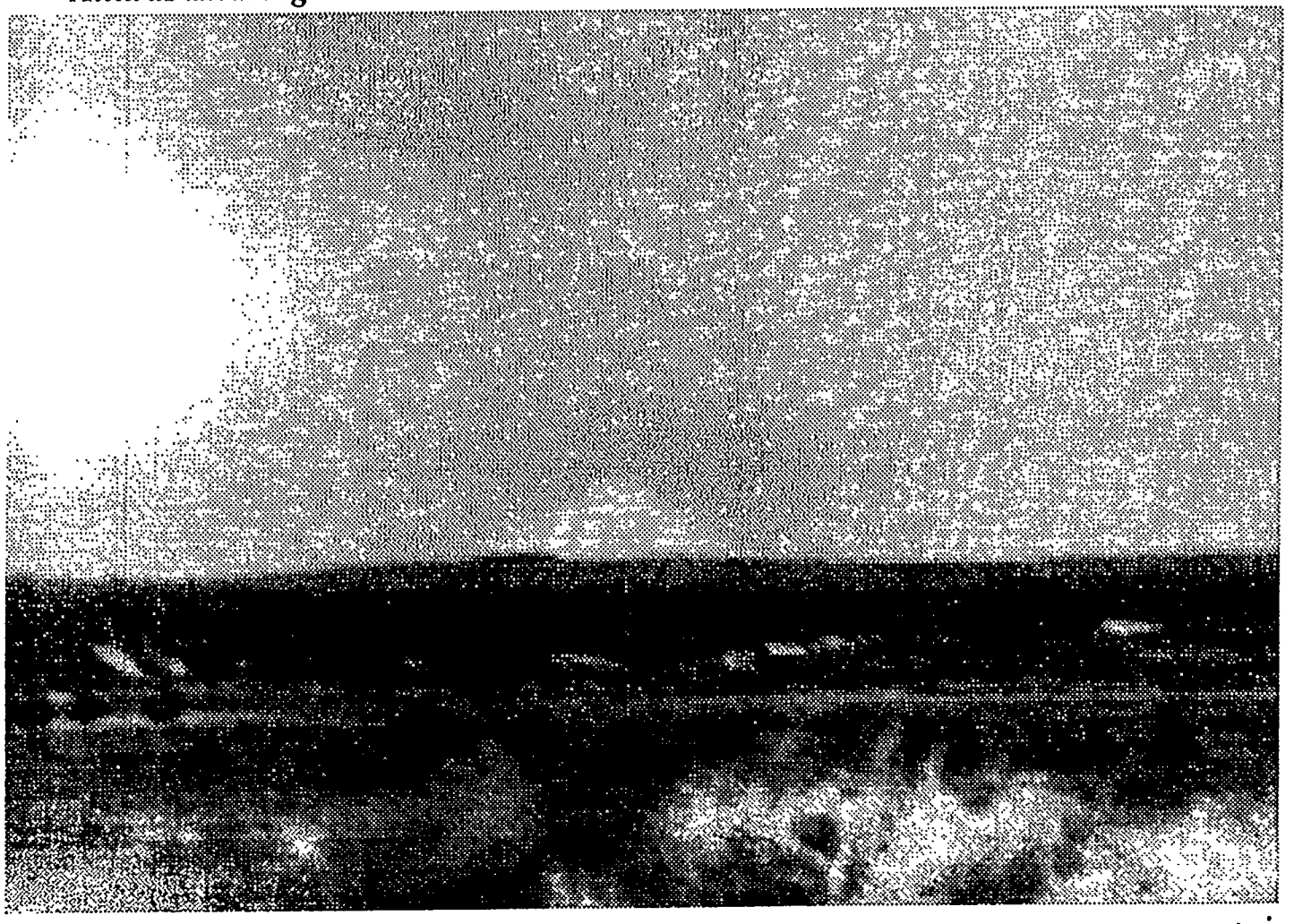
If you find it necessary to grant Sierra Pacific the right to put their power line along the route(s) which they have planned. We hope you will consider the people's lives, plans, wildlife, scenic views and other factors involved here.

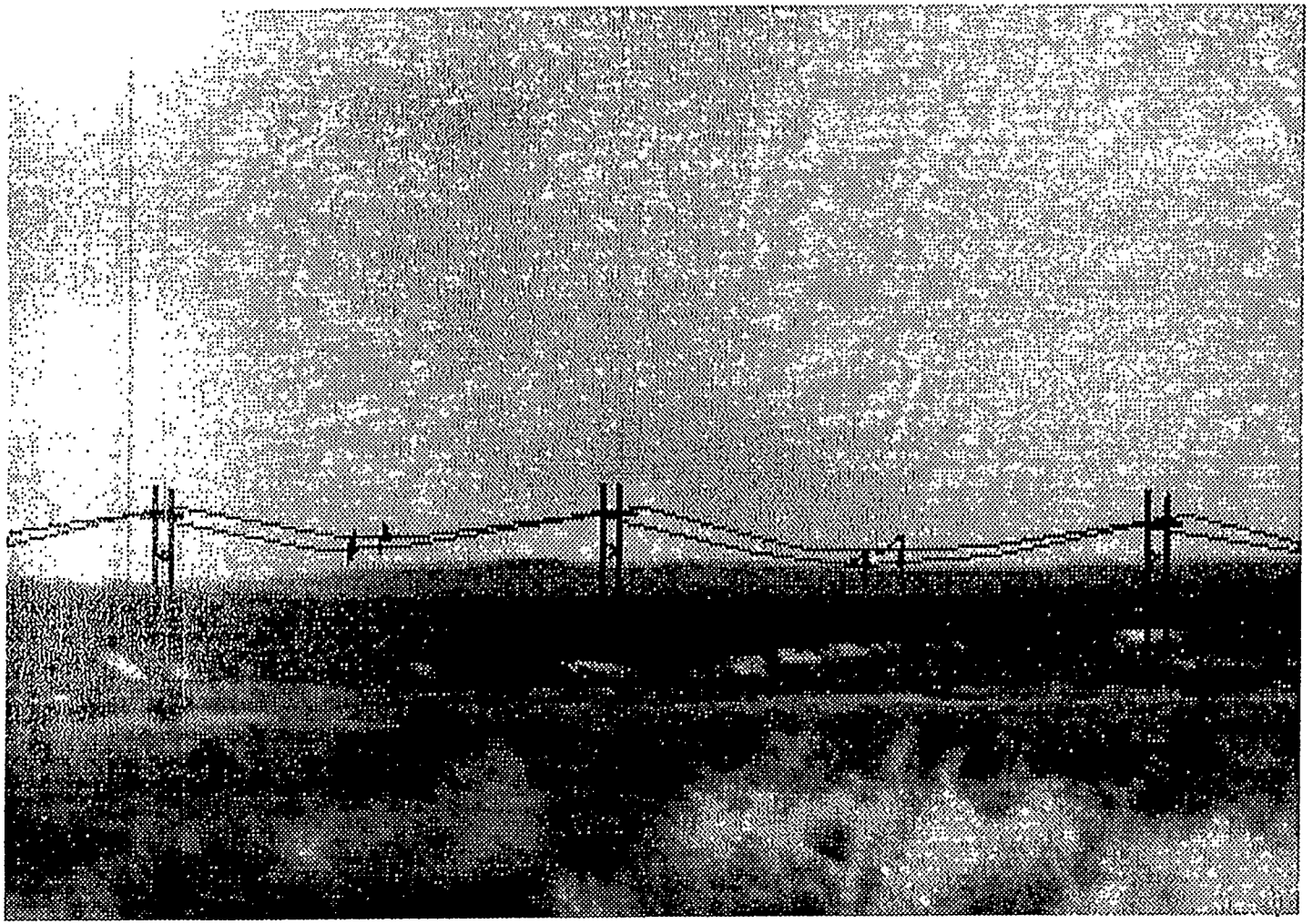
Sincerely,

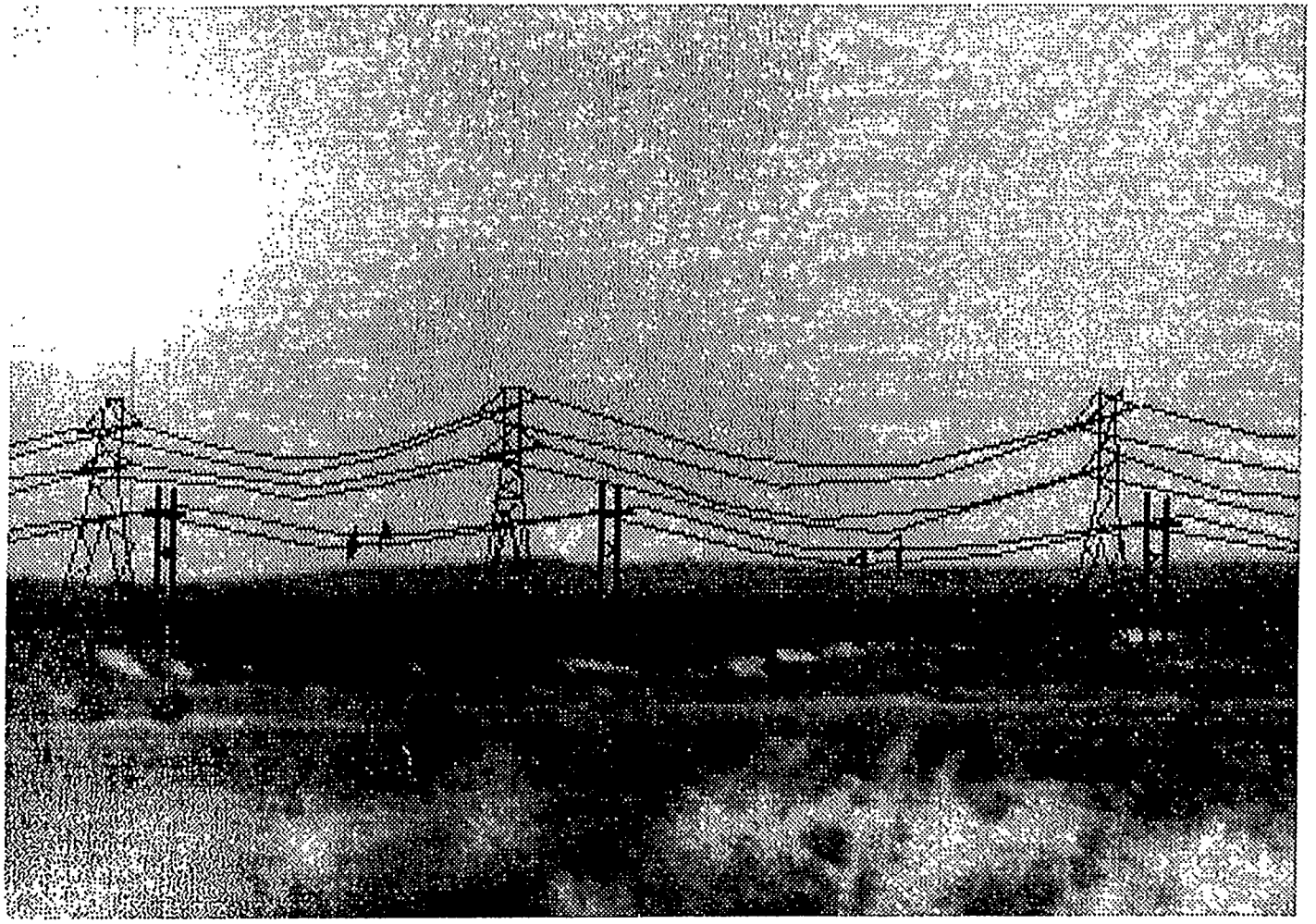
Earlie & Brown
Mary A Brown

Recieved from Mr. Mark Armstrong at the Alturas Hearing 4/17/95. Please see the Transcript from the Alturas Hearing. See comment TA.8-1.

General Public Comment Set 9







pg. I.

RECEIVED APR 17 1995

General Public Comment Set 10

To whom it may concern:

When all is said and done, the final fact remains this, none of us need to look at electric lines or towers to gratify the whims and overbuilding of Reno, Nevada or anywhere else!! Let Nevada have the lines.

Modoc County does not need more power, but we are in the position of having our landscape ruined for the benefit of some cities.

GP. 10-1

People live in cities and in our county because they choose to do so.

We didn't make our attic into an upstairs so that we could have a better view of the proposed power line. We built it for additional room and to have a better view of Red Saddle Peak, Tulelake and Likely Mountains!!!

With all our modern technology, power lines should be put under-ground as are most cables of any kind now.

pg. II.

GP. 10-1

Our children plan to retire back here in two years when their twenty years are up in the United States Navy. They have lived in cities here and abroad to make a living, but they choose to come home to retire because of the beauty and ~~quite~~ quiet of Modoc.

Let your cities look like cities, but leave Modoc alone and let us continue to enjoy an uncluttered and open landscape.

Mrs. Patricia Klemick Pentuff
P.O. Box 53
Likely, California 96116

Draft EIR/S Comment Sheet Alturas, Calif. Rec'd 4/17/95
Proposed Alturas Transmission Line

General Public Comment Set 11

Name: JOHN P. CLARK
Affiliation: HOMEOWNER/LANDOWNER
Address: HCR 4 BOX 40570
City: ALTURAS **State:** CA **ZIP:** 96101
Phone: (916) 233-2939 **CPUC Application No.:** 93-11-018 **BLM Case No.:** CACA-31406

THE DEIR/EIS DOES NOT ADEQUATELY ADDRESS THE ALTERNATE ROUTES. THIS PROJECT SHOULD USE EXISTING UTILITY CORRIDORS, NOT CREATE NEW ONES. ANY IMPACTS OF THIS PROJECT ON PRIVATE PROPERTY SHOULD BE BORNE BY RESIDENTS OF THE RENO AREA, i.e. THOSE WHO WOULD BENEFIT MOST FROM THIS PROJECT. I BELIEVE THE PROJECT SHOULD BE ROUTED THROUGH WESTERN NEVADA, AND SIERRA PACIFIC POWER CAN WORK OUT THEIR ROUTE THROUGH RENO/SPARKS. PROBLEMS ENCOUNTERED IN NEVADA, SHOULD BE OFF LIMIT OR NO CONCERN TO THE C.P.U.C. GP. 11-1

John P. Clark

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED APR 17 1995

April 7, 1995

Public Utilities Commission
ATTN: Mr. Daniel Fessler
505 Van Ness Avenue
San Francisco CA 94102

General Public Comment Set 12

Dear Mr. Fessler:

This letter is in reference to CPUC Application Number 93-11-018/BLM Case Number CACA-31406.

The references involve a project intended to transmit power from Oregon and Washington to Reno, Nevada. Why the existing Utility Corridor in Nevada is not being used for the project puzzles me to no end. GP. 12-1

But, if the decision to bypass that corridor stands, and the line is built in Northern California, then the Segment A alternative, near Alturas, must be selected:

> Alternative Segment B would cross a Wildlife Service Easement. The easement is managed, much like the Modac Refugee, to provide important wildlife habitat along the Pit River. The owners of the land, which includes the easement, have invested substantial effort and money to improve habitat. That habitat would be substantially and adversely infringed if Segment B is constructed. GP. 12-2
>
> Alternative Segment A is farther away from the City of Alturas than is B. Increased distance would reduce: the potential for spur-of-the-moment vandalism; the hazard to aircraft using the Alturas Airport (including fire

> tankers , when necessary), the probability of human injuries in the event of a line collapse; and, the potential/probable health hazards that are being associated with high voltage lines. GP. 12-2

Sincerely,

LOUIS H. PRUSINOVSKI

cc: Boyd Gibbons, DFG
Edward Hasty, State Director of BLM
Tim Leslie, State Senator
Wally Herger, US Congress
Bernie Richter, State Assembly
Aspen Environmental Group

Draft EIR/S Comment Sheet RECEIVED APR 17 1995

Proposed Alturas Transmission Line

General Public Comment Set 13

Name: Mrs Marie Roberts
Affiliation: A+M Pump + Plumbing
Address: 1057 Main St. 299 Highway West
City: Alturas State: Ca. ZIP: 96101
Phone: (916) 233-2773 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

do not wish utility line to go through or near Alturas, prefer County through Madeline Plains (GP. 13-1)
do not wish to have this line near my property

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED MAY 08 1995

1057 Main St.
Alturas, Ca 96101
May 6, 1995

Julie Halligan / Peter Hamm
CPUC / BLM
c/o Aspen Environmental Group
30423 Canwood St, Suite 218
Agoura Hills, Ca. 91301

Re: CPUC # 93-11-018
BLM # CACA-31406

Dear Sirs:

(GP. 13-2) Please consider this a formal protest against Alturas Transm. Line to be installed through Alturas by Sierra Pacific.

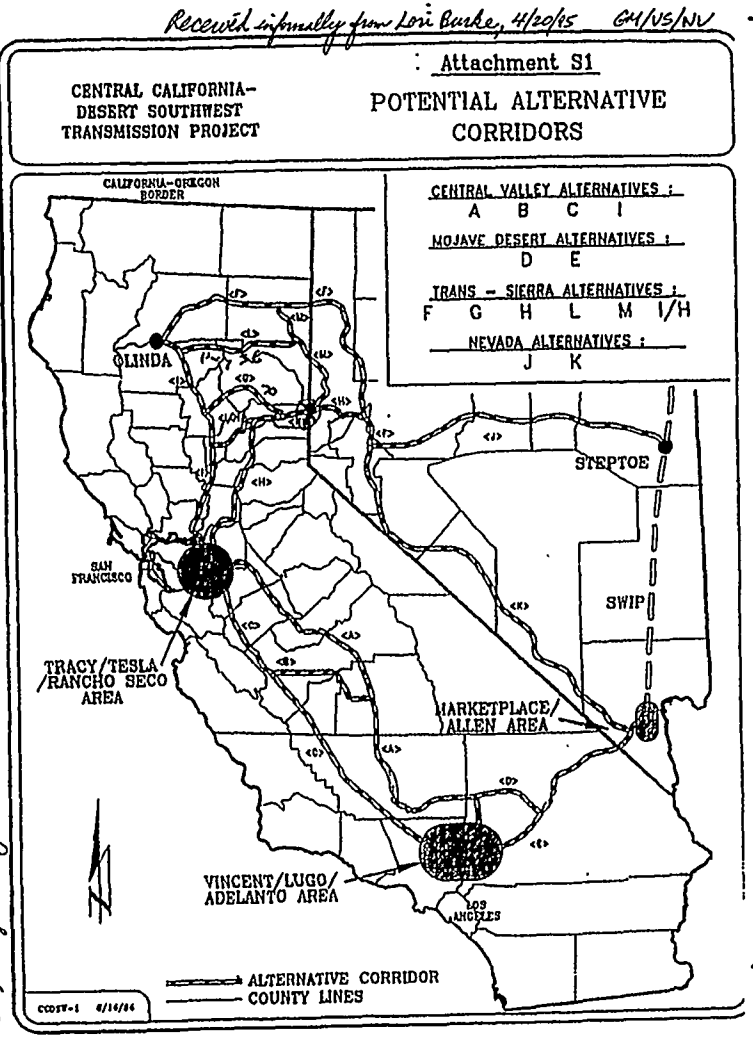
We don't want this line through the routes shown on map.

Yours truly,
Mrs. Marie Roberts
Adrian Roberts
Bill Roberts
Madeline Roberts

General Public Comment Set 14

Received informally from Lori Burke, 4/20/95 GH/VS/NV

Bill - This map just shows the proposed alternatives for 1 (or more ?) TANK routes. The Red X marks the Bordertown substation proposed site. This map does not show the route of the proposed SPPCo Alturas line, or any existing transmission corridors. TANK is apparently a group of utility whatsers; not a producer.



GP. 14-1

RECEIVED JUL 15 1995

My name is Lori Burke and I live at 4850 Mason Road reno. I want to comment on the draft EIR/S . I have had ann opportunity to read and study this document and I feel I can Challenge most of the basic premesis as put forth by the proponent as justification for the routing.

A routing constraint was on this line from the beginning of this project having to do with the pre-selection of the Border town substation site by Sierra Pacific. This site was selected and purchased around 1990. Sierra was an unidentified buyer, using agent Pat Morrisey(?). At the time of the purchase, Sierra was working with and in communication with the Transmission Agency of Northern California and with an agency associated with TANC that did routing studies. The selection of this site in 1990 was for possible future interstate transmission interconnections. The ligitimacy of this being used as a valid routing constraint for the Alturas project is being challenged by Sierra County, but it should be pointed out that Sierra Pacific never applied for a special use permit or recognized that they were in conflict with codes covenents and restrictions that were in place with the use of this parcel for a substation until after the entire routing was done using this parcel as a routing constraint. Nor did it take into account the consistant nature of Sierra County government rejection of projects of this nature. Yet, Sierra Pacific, in the PEA for a project they proposed in 1993 referred to this Bordertown substation location as an "existing substation site" What made a vacant parcel of land in the middle of an historic ranching neighborhood that was furthermore covered by codes, covenents and restrictions to keep it that way an "existing substation site" was not addressed. Nor did the draft EIR/S recognize that, according to these same hearings in front of the ALJ, that there were no other substation sites that Sierra even studied after 1990 related to other locations that might serve the same purpose in this project. This includes during the preparartion period prior to the application for this project and for the entire time of the scoping project and comment period that was part of the process for the Draft EIR/S for the Alturas project. Nor,until this hearing before the CPUC beginning May 22, did Sierra give the information about when this property was actually purchased by Sierra, although I asked Steve Yonkin directly on previous occasions. Since this information was not part of your draft, I expect Aspen did not know, either.

This is important since this station location was decided on far in advance of the Alturas The Alternate location is just a minor variation on what Sierra used the effects the same group of people in the same way and continues to be a constraint for the remainder of the line. into North valley. This relates to Aspen,s assertion that there are no plans ti add on to this substation so consequently, there is no need under growth inducing impacts to identify and examine them. Knowing how this site was chosen,why this site was chosen and in connection with whom this site was chosen, Aspen cannot continue to say that there will be no additional impacts to this area as a result of this project. This document should fully explore the environmental impacts that any reasonable person would assume will result considering the history of the siting of this electrical facility and what the location of this substation will mean for the future of this historic valley.

GP. 14-2

project higher than average growth."(A19) "By 1997...Additional transmission facilities will also be needed to accomodate anticipated growth in the North Valley area north of Reno. " On page (A21), the issuue of reliability is brought up. This problem is discribed

ET selection
Growth in North Valley
reliability

as an "existing bottleneck" the implicit example given that to build this project would be like making an existing hyway into a freeway.

Sierra 's proposal discribes a need, and then offers the conclusion that this need can be met and the reliability issue addressed by bringing this line into the North Valley Road substation at 345 KV. In order to evaluate the ligitimacy of the routing in Nevada as proposed Sierra this EIR/S needs demonstrate that Sierras proposal is a justified. Aspen environmental asked Sierra to provide substantiation for the routing in this section and I will use the response of Sierra to Aspen (8 /25/94) and of the Environmental Consultant Mr. Dan Wood of Aspen (9/4/94) to organize my response, as well as data related to growth from Washoe County Comprehensive Planning.

Growth in North Valleys

1. Growth in Lemmon Valley, Golden Valley, Stead Red Rock, Cold Springs, all under various development moratoriums and limitations having to do with lack of water and water import restrictions. These are "Dry" valleys, and this condition will not be changed any time soon, Dry valley' s cannot import water because they are prohibited from water importation and discharge between the various water basins (valleys) . All these areas are experiencing low to only moderate growth and continue to develop at low rural density. Stead does have an area of light industrial zoning, but the space available is limited and its primary use is for low water and low energy industry because of the water restrictions. . Stead also has a build out of one significant housing parcel and one project proposed. However, these have been on the books for a long time, and they are the tail end of the planned development The back-up J.C. Penny line into Stead has never been upgraded to the 120 it was designed for from the 60KV it is now equipped for which is indicative of the lack of need. GP. 14-3

2.If Sierra is considering Spanish Springs as one of the North Valleys, there is growth and growth potential there since there is water in that basin that can be converted from agricultural use to residential use. However , any anticipated rise in demand for residential electrical use should consider that the demand will be modified by the fact that there will be a corresponding drop in agricultural pumping. Growth in this area will remain residentially based. GP. 14-4

3. Please refer to page A-27 in the Draft EIR/S. Spanish Spring is identified as an area that could need support as soon as 1997. Aspen Identifies a solution that would directly get power to Spanish Spring sub that would not depend on Alturas power into North Valley Road. Sierra proposes a solution that is not interconnection specific.but based on just gettin more power into the system. If this is the case, support for all growth Sierra says in this section that just having but would work as well if the 345 came in at almost any point in the system GP. 14-5

Growth in Lake Tahoe

1. Sierras territory is largely under the jurisdiction by TRPA who set probably one of the most restrictive growth policies in the United States. There is some growth in the Tahoe recreational bussiness, but much of that growth is not in Sierras Territory. Several years ago, there was a move to ambitiously develop a large part of Mount Rose into Resorts and residences (Galena) but that land has now come under public ownership and will be preserved. GP. 14-6

2. Sierras facility to serve Tahoe do not even come out of North ValleyValley Road directly, so support for their system wold have to be indirect (not system location specific), or would have to involve additional transmission lines from North Valley Road substation. The corridor to that area out of the substation is so conjested that this scenario is highly unlikely. GP. 14-7

I address the "reliability concerns in other areas in my letter, but I do not find any documentation that Reno/ Sparks/ Carson City /Lake Tahoe /Spanish Springs /Stead and other North valleys have a reliability problem that is even close to unacceptable in an industry standard evaluation.. If we have problems in the Reno area, it is usually because of storms that effect small areas, or a Mack Truck running into a power pole. GP. 14-8

~~c[illegible]ing 120KV lines should be buried to mitigate these impacts, but the cost to do sh[illegible]ld be [illegible]her.~~

~~Other areas such as [illegible] are avoided because detrimental effects that would be experienced by the public may out weigh the good. If the need to a particular party is such that they feel there is no alternative to impacting the public recreation area, for instance, they should be prepared to totally mitigate the damage. If such is the case, Mitigating the damage at 120KV is a lot cheaper than at 345kv.~~

~~I understand that you can get costs even lower than those quoted at the bottom by Mr Owen for the 120KV if you incorperate their design and the space for undergrounding utilities, including powerlines, in the planning stages. The costs associated with buring existing lines are very site specific, and that I am not willing to challenge Mr. Owen as to cost unless he wants to point out a specific example and give me time to rebuttal. How ever I doubt very much that even with Sierra Pacific burying the most site specific expensive portion on this proposed route could it cost 10 times as much as if that section were run above ground. Not unless Sierra wants the rebuttal to include a portion of [illegible]n.~~

~~Does this conclude your testimony on Mr. Owen's rebuttal?~~

~~A. Yes it does.~~

~~Please proceed with the rebuttal to the your testimony by Mr. Oldham~~

B-83
LAWPP
CORRIDOR

A. The Government and the public recognized a need to establish corridors that could facilitate the transmission of electricity through states. Permits for these corridors, such as the one that would be parallelled by the Nevada alternative suggestd here, were given, not particulary related political boundaries or political entities that benefitted. ~~In my testimony above~~, I indicate that the project objectives could be served with a routing East of Sparks that could utilize space parelleling such a corridor. Sierra is asking citizens of two states, some who benefit and most who do not, to bypass the chance to utilize this existing corridor and they must consequently absorb the environmental societal and socioeconmic costs that would result .from opening up a new corridor. The parochial point that is reached in this issue is how people who face such impacts can have their concerns addressed. This is usually done on a political areana, starting at the local level.

It is critical to me and to many of the citizens and local political bodies involved in evaluating this project that this particular transmission line not be allowed to jump off the existing interstate transmission network that the Nevada Alternative is part of the ~~Alternative~~. This interstate corridor was established to allow for the DC line that goes to serve Southern California, but I see no reason why it would not be equally available to use by Nevada and Northern California and anyone else who might use the power from the Alturas project but not want to absorb the immediate impacts of having it actually run next door.

GP. 14-9

This project is a transmission project with interstate application. Your document does not address the legitimacy of ~~this the~~ of containing this type of ~~as~~ facility to existing corridors. The fact that these types of corridors are part of a program to allow for the creation of interstate corridors per the Federal government, I would think the applicant would, per Hermondi Act, be required to ~~demonstrate~~ address and demonstrate why they would bypass the use of the No. Alternative.

GP. 14-9

ALL PROJECT OBJECTIVES COULD BE MET WITH THE USE OF THIS CORRIDOR, INCLUDING ~~[illegible]~~ IMPROVEMENT TO THE RELIABILITY OF THE RENO/TAHOE (Sparks NorthValley, Spanish Springs) AREA. THIS ALSO IS ON THE ~~[illegible]~~ WEST SIDE OF SIERRAS SYSTEM. ~~THE COST OF USING THIS CORRIDOR IS SUBSIDIZED BY THE~~

GP. 14-10

1. PLEASE ~~[illegible]~~ PROVIDE AN ANYSIS OF THE COST SAVINGS OF USING THIS CORRIDOR FOR THE INTERSTATE COMPONENT OF THIS PROJECT, VS. RUNNING ~~[illegible]~~ ALONG THE PUBLIC + PRIVATE PROPERTY THROUGH NORTHERN CALIFORNIA THE INTERSTATE COMPONENT WOULD BE ACESS TO CHEAPER NWPP energy, and the additional transmission service provided to the ~~Oregon~~, California, and the utilities embedded in Sierras System, including Oregon.

In the draft document, problems are identified with the proponents route that would connect the Alturas area with the Nevada alternative. These problems were brought up in the August Scoping meetings after the close of the scoping comment period that excluded the public but responded to agency concerns. What Aspen and the proponent did in this process was was to demonstrate that the crossong Sierra had developed and eliminated prior to their application to the CPUC was inadequatly reserched and difficult. The applicant and Aspen should have at that time focused on expanding the scope of options that would have allowed the crossing beween California and the Nevada Alturnative, even if the objective of serving LMUD were added.

There was no justification for eliminating the Nevada alturnative at those meeting because on the proponents inadequate exploration of alternate routes to get to the Nevada Alternative The draft document should address this lack of alturnatives offered when so many environmental advantages could accrue with the utilization of the Nevada alturnative for as much of this North South distance as possible.

GP. 14-11

Comment on Draft EIR/S re: the elimination of the Nevada alturnative.

Lori Burke

Comments related to the growth inducing and long term impacts of the proposed routing through the Reno Area vs. the use of the Nevada Alternative with termination at Tracy. With the proposed alignment, Truckee Meadows residents have exposure to the environmental degredation that could result in being an integral and unaviodable part of a path to move bulk energy to various markets out side our area. Sierra will be getting both import and export capacity as a result of this merger and this project. The 345 that will run all the way through reno as a result of this project could become a conduit or a "road" to move bulk power through the system . For example. if the power that should accumulate on the eastern side of Sierra's the system by virtue of the merger become such that Sierra-WWP would like to move it through as bulk transmission to markets west of Reno,they might consequently need to enlarge the path.through the Truckee Meadows and the North Valley Substation to 500 kv . The 345 line proposed in this project would have to become 500 kv as well. Sierra alludes to this with a discussion of a Phase shifter being located at substation in Reno,(if not at BT.) With the proposed project, Sierra is setting the precedent that even the expansion of their transmission commitments is adequate justification to expand their access to power markets and sources along with the physical facilities and ROWs,to supply those markets.

GP. 14-12

Because of the cheap power available thorugh transmission, because of the size of this project (it will double Sierras import capacity), and because of Sierras proposed merger with a big player on the bulk transmission market, there is little reason to assume anything except that transmission buissness will be growing and theTruckee Meadows will be subject to further impacts, unless we get out of the way now by having Sierraroute around

1 growth inducing

us with their big line. We need to keep them on the existing Highway network rather than letting them build a new path through the Truckee Meadows. Sierra is in the Bussiness of selling energy. They say that they legally have to expand their system if they can't keep up with even their transmission customers capacity demands. They are also a corperation whose bussiness is to sell power. They that can't legally turn down anyone who wants to buy their power or their transmission capacity.

If we dont want to expand our vulnerability in the Truckee Meadows to the further impacts that transmission expansion will bring through our area, Impacts associated must be identified and addressed through the draft document now, recognizing that the merger and combined needs and resources of Sierra and WWP will have future impacts.

2 growth inducing

These are comments related to the cost of undergrounding both 345 + 120 KV lines *

[redacted]

A. yes, for on two points. First, you dont have to bury the whole line. Various points in urban settings like the Truckee meadows are not incompatable with 120 kv transmission lines. Most power linesof that voltage are run above ground and Reno/Sparks obviously has numerous corridors where power at voltage 120 and under can be run above ground. Only short parts of 120Kv lines would need to be buried because generally, they don't impact sensitive areas. Where you do bury them, usually it is economics that dictate it., not what prevents it. If buring a line is reasonably cost effective and the benefits that a developer or a casino owner, homeowner,property owner association or even a City might get outweigh that cost, the line is buried. In the case of running a 345 vs 120kv, particularly in the existing urban area that is set up to deal with no larger voltage than 120 kv, you run into more conflicts with the additional impacts associated with larger ROW's and that are over and above what already exist, as well as issues of public health concerns and Visual degredation to a more far reaching population. It is more likely that these combined would make it more important that even longer portions of 345kv than corresponding 120kv lines should be buried to mitigate these impacts, but the cost to do so would be much higher.
Other areas such as public parks are avoided because detrimental effects that would be experienced by the public may out weigh the good. If the need to a particular party is such that they feel there is no alturnative to impacting the public recreation area, for instance, they should be prepared to totally mitigate the damage. If such is the case, Mitigating the damage at 120 KV is a lot cheaper than at 345kv.

GP. 14-13

I understand that you can get costs even lower than those quoted at the bottom by Mr Owen.for the 120KV if you incorperate thier design and the space for undergrounding utilities, including powerlines, in the planning stages. The costs associated with buring existing lines are very site specific, and thus I am not willing to challenge Mr. Owen as to cost unless he wants to point out a specific example and give me time to get bids. How ever I doubt very much that even with Sierra Pacific burying the most site expensiveportion on this proposed route could it cost 10 times as much as if that section were run above ground. Not unless Sierra wants to reroute this to include a portion of Downtown Manhatten.

Burying lines across public areas such as the Forest Service lands and the Pinkham lands would be cheapest of all because these sites don't have existing structures, + ROW purchase is minimal and/or absent.

IN THE SECTION ON BIOLOGICAL RESOURCES THE DRAFT SAYS 10-30 TIMES AS EXPENSIVE

DRAFT AR COMMENT

[redacted]

PLEASE IDENTIFY THE CONCERNS YOU HAVE WITH THE ROUTINGS THROUGH WASHOE COUNTY THAT WERE UNDULY CONSTRAINED, [redacted]

A. Once Bordertown was used as a routing constraint to the point of entry into Nevada (and Sierra's territory) alternatives were further limited by Sierras Identification of North Valley road as the only possible terminus. The first alternative went west from Bordertown around Peavine through Dog Valley Recreation area, and then doubled back all the way into Reno to get to the North Valley Road substation. This made for a much longer route. It did not come closer in proximity to existing residences than what is proposed in the preferred route but was visible to more homes within the Reno City limits This route also crossed adjacent to Rancho San Raphael, a major regional park, as does the preferred route Although this route could have possibly been tied into Sierra's distribution system at other substations on the west side of the system, such as the California sub with its spare phase shifte already in place, there any possibilities along that line were not addressed. This alternative was eliminated for length and impacts. A second alternative looked to travel along 395 from the state line into the North Valley Road substation. However, Sierra was quick to eliminate that alternative as being impossible because of existing utilities in the ROW next to the highway. Sierra claimed they had insufficient room to expand it to accommodate a 345kv line. Development along the highway in this section is very limited but buy out for space would be of commercially zoned parcels from private property owners and would be, consequently, very expensive. Sierra's preferred route through this area takes economic advantage of Forest Service land.

GP. 14-14

During scopeing, another route was suggested by the Forest Service that would not impact Forest Service land. It involved not going directly through a proposed station at

Bordertown but approached the Reno area from the north in same vicinity to get into the North Valley Road substation.. Sited as a reason for elimination of that route was that there could be residences within 300 feet of the corridor, ~~which is also the case with the proposed route~~. The proposed line has houses and/or apartments within 266' of the centerline (much closer)

All proposed alternatives had at least several element in common with the final proposed alternative that were cited as a reason for not using the alternative. No routing constrained by Bordertown (with or without a substation there) and a proposed terminus at North Valley Road is acceptable.

GP. 14-14

Aspen, ~~Gail for~~ please respond

Q. PLEASE IDENTIFY PROJECT OBJECTIVES THAT WILL BE MET THAT ARE NOT SITE SPECIFIC TO THE TERMINUS OF THE LINE AT NORTH VALLEY ROAD.

A. All of the Project objectives that I identify later in this testimony as part of the section dealing with the use of the Nevada Alternative could be met with 345 interconnection at other points t on the line, including additional supply reliability to support this particular load center.

GP. 14-15

I also understand that the Pinion coal gasification plant that is due to go on line in December of 1996 will add not only capacity within the Central District, but will substantially increase reliability as well, based on having local as opposed to transmitted generation.

Second is up from bottom

delete

Q. PLEASE CONTINUE WITH YOUR TESTIMONY ON THE THIRD ISSUE NOTED IN YOUR INTRODUCTORY COMMENTS.

A. Issues one and two above relate directly to my third concern - that being that Sierra inappropriately limited the study of possible alternative, specifically and particularly the "Nevada Alternative".

Q. WHAT POINTS WILL YOUR TESTIMONY COVER IN ADDRESSING THIS ISSUE?

A. I will testify that assignment of Lead Agency status to California effectively limited the study of alternative routed through Nevada. Nevada routings would utilize the existing

P. 8

high voltage transmission corridor for much of the total length of the line Friends of Peavine questions the value of the environmental information Sierra used to support the elimination of that alternative. ~~In addition, I will point out how use the Nevada Alternative will meet all criteria of this project.~~

~~Q. PLEASE SUPPLY YOUR COMMENTS AS TO THE FIRST POINT ABOVE.~~

~~A. Sierra went before the Nevada Public Service Commission (NPSC) for approval of the Alturas Project as part of their 1992 Electric Resource Plan. The general routing that Sierra presented to the NPSC was in California, and acceptance of that general routing was part of the Commission approval. This led to the CPUC being designated as the lead state agency. Alternatives that would mostly utilize existing corridors in a short section in California to get to the major LADWP corridor coming from the east in Nevada in a Southerly direction to the vicinity of Reno were never studied by Sierra at this point.~~

~~When a Nevada Alternative was identified by numerous groups and individuals during the CPUC scoping process, Sierra held that an alternative utilizing the existing LADWP corridor could not be added for study. Mr. Olade cited project delays that he translated into cost increase related to the time it would take to reapproach the NPSC with project amendments to include an alternative routing in Nevada.~~ THIS RELATES TO EXHIBIT B

LB EXHIBITS 1 AND

Q. ~~WAS THAT THE EXTENT OF SIERRA'S COMMENTS ABOUT A NEVADA ALTERNATIVE~~?

~~A. No. This will be addressed in the second point I make about the limits of Sierra's environmental information they used to eliminate study of this alternative.~~

Comments: elim of Nv route Aspen, respond, please

Q. PLEASE EXPAND ON YOUR COMMENTS

A In comments addressed to the CPUC, Sierra said the routing out of California into Nevada would be difficult based upon few specific environmental constraints and land use conflicts. Friends of Peavine agrees with Sierra that the first thirty miles in any direction in California from the possible points of connection to the BPA line in Modoc county would

GP. 14-16

be difficult. However, the impacts Sierra cited to justify elimination of a route east from Alturas into Nevada are no more severe than those identified through the scoping process as applying to Sierra's remaining alternative. Because of the sensitive nature of the area, all alternative should have been kept open, particularly those identified as utility corridors by the U.S. Forest Service.

Once in Nevada and adjacent to the existing 1000kv DC line, no significant environmental restraints are noted. When the line gets closer to the urban Reno/Sparks area, termination at North Valley Road Substation requires crossing between the 1000kv corridor and the North Valley Road Substation.

Possible routes through Sparks encounter the same problems as are encountered crossing between Bordertown and North Valley Road, including the conflict with existing development and compromises to system reliability. If routed through Sparks, the distance the line travels through urban area is longer and the impacts are correspondingly greater.

Routes that might approach the North Valley Substation from a different direction are not adequately evaluated, but, overall [redacted], the impacts encountered here are not more significant [redacted] in type and degree to those encountered in the proposed routing. through the urban areas, if the Forest Service path is followed.

In summary, Friends of Peavine finds that Sierra had no environmental justification to eliminate Nevada routing alternative prior to submitting their Application to the CPUC and prior to scoping activities undertaken as part of California's review process.

Further comments on draft EIR elimination of alternatives

GP. 14-16

~~Q. YOUR THIRD [illegible] ALL MAJOR PROJECT OBJECTIVES COULD BE SATISFIED BY A ROUTING [illegible] THE NEVADA CORRIDOR. PLEASE ELABORATE.~~

A. As I discussed in the first part of my testimony, there is no need to go to North Valley Road at 345 kv to terminate this line. With a substation addition at Tracy or with a new substation constructed in the vicinity where the Alturas 345 kv crosses the corridor containing Sierra's existing intertie, the Company could interconnect at 345 kv its existing intertie. It could add reliability and could [redacted] then "unload" the new intertie with 120kv connections in existing corridors going west from the Tracy substation into Reno/Sparks. Some of these could be "double ended" to existing lines that now travel into North Valley Road to relieve potential stress on the lines between Tracy and the load center at North Valley Road.. This would provide additional access to a new power source to augment the Central District load with out unduly impacting the residential areas with 345kv corridors Additional reliability both within the central district and from the outside sources that supply the district would be achieved.

GP. 14-17

As I stated before, other benefits Sierra seeks to achieve with this project would not be effected. A second strong source of power would be added into the system. Access to economy energy would be enhanced as proposed and additional import and export capability would be gained.

GP. 14-17

- 10 -

PAGE NUMBER: 2 | DATE: / / | PROJECT:

COMMENTS | ACTIONS/TASKS

Point + info from CPUC hearing re Phase Shifters

Engineers.

Address in EIR/S

Engineering

Per Scott's Nelson quote "the Bt. phase shifter will be the biggest on the west coast."

What does the Phase Shifter size have to do with how much power and capacity it has? Will its import capacity rating be correlated directly to its size? Will it be able to be interconnected to other utilities, or have more transmission connections, because it is bigger? Why would a 345 KV line need to have one of the "biggest Phase Shifters on the West Coast." To Rio's needs? (GP. 14-18)

Point from CPUC need hearing (see page 8) EIR/S comment

What projections Steve Larkin working on in 1990 when he was instructed to buy the S.T. Property. They were working with Michael Clayton, "I-ME", and TANC at the time. (GP. 14-19)

Legal EIR/S comment

Our position is that this project is an interstate transportation of electricity project and we feel it is best to keep this project confined to interstate considerations that exist to accomodate it. How does this fit in with the Sacramento Act? (GP. 14-20)

PROJECT SCHEDULE

MONDAY DATE	TUESDAY DATE	WEDNESDAY DATE	THURSDAY DATE	FRIDAY DATE	SATURDAY DATE	SUNDAY DATE

PAGE NUMBER: 6 | DATE: / / | PROJECT:

COMMENTS | ACTIONS/TASKS

except a future Lôth Valley interties, this situation is identical in cost to what LMUD would be doing to tap into the line.

No Alternative

What percent of Sierra alternative cost for the Nevada route relates to the cost of crossing Sparks and could thus be eliminated if the line stopped at Tracy. (GP. 14-21)

Nevada alternative

No Alternative

What studies were done to determine the damages possible if a plane going from West to East flew into Sierras lines and then flew up to drag the lines to the LADWP line. (GP. 14-22)

No. Alternatives

Who owns the land around the LADWP corridor? Who gave it to them? This is Federal land, set aside for this purpose. Much Federal land set aside along the proposed route was set aside to preserve & protect it specifically for other uses such as Preserve for recreation. (GP. 14-23)

PROJECT SCHEDULE

MONDAY DATE	TUESDAY DATE	WEDNESDAY DATE	THURSDAY DATE	FRIDAY DATE	SATURDAY DATE	SUNDAY DATE

7 / /

COMMENTS | ACTIONS/TASKS

The cost of the section running through the [illegible] to avoid [illegible] day, at the [illegible] proposed BT substation B. Tracy from ALT → BT vs NU from

City of Reno

Draft comment

Owen says because of noise, construction dust, visual impact, etc. this substation addition at B. North Valley road would "never be permitted." How would Sierra need to get a permit relative to the fact that they are putting like type improvements on their own property ~~and~~ (probably) zoned for use of this type. ~~How would it relate to the public roads and convenience and efficiency for Reno? What about the transmission corridor, which would need favorable for "such" order to allow condemnation?~~

GP. 14-24

~~Tom~~

Sierra offering a 1 year freeze as part of merger, but can change rates if availability of cheap hydro power changes (the salmon mitigation?) and/or they can if fuel prices change. Rate changes ~~are~~ between user classes can vary as well.

GP. 14-25

NUMBER 8 | DATE / /

SUBJECT

COMMENTS | ACTIONS/TASKS

Engineers

Need to differentiate between sites specific for B.T. Tracy + North Valley for other transmission interties + distribution.

~~In EIR/S comments, include matrix and two [illegible] comments.~~

Sierra Co Legal (see pg 2)

In 1990, Bordertown property was purchased. Sierra ~~The~~ planned land use at that time was not consistent with the general land use plan (that was being formulated) for a substation. Sierra also would have to violate codes, covenants and restrictions on that parcel, and would have to get a special use permit. They did not participate in reviewing the general land use plan. They did not make applications for a special use permit. They made no attempt to reconcile the CC and Rs with their planned use of the parcel. It, in the DEIR, The B.T. substation site is referred to as

GP. 14-26

DAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
DATE	DATE	DATE	DATE	DATE	DATE	DATE

PAGE NUMBER: 9 | DATE: / /
PROJECT: Act was (con't)

COMMENTS | ACTIONS/TASKS

as an "existing substation site," and al plans were and sorties were constrai by this parcel location including the location of the alternate which is the preferred today.
Is this prudent planning on Sewas part?

GP. 14-26

Renoplanning

Are new residences (since 1990) except those on the Westside of the hill, close to the N. Valley site of the proposed substation expansion than the existing? How far (in miles) would this sub be?

Answer

It is further from the ~~ex~~ residential homes than is the existing substation facilities.

Engineering (see legal p5)

If the placement of BT is not for Kern distribution needs and is tied to regional markets (through interconnections in pos at N. Valley), how does this information effect the legitimacy of saying, as Draft does, that there is no reason anticipate expansion from this site.

PAGE NUMBER: 11 | DATE: / /
PROJECT:

COMMENTS | ACTIONS/TASKS

Engineering

What is a reactor used for and how could it be an optional component ~~of choices~~ in this project. Would the choices to include the reactor relate to distribution and/or transmission. Choices or would just plain engineering concerns dictate whether it would be included and placed? (Part of the planned additional BT + part of the disputed need if BT relocated to N. Valley.

GP. 14-27

Engineering phase shifter

At what point (20 mins → 1 day) does access to service the phase shifter become critical. Testimony said 20 mins wasn't critical in terms of interrupted service, but longer was. Could it be located in Tassen Co.

GP. 14-28

May 18, 1995

Judge Richard Careaga
California Public Utilities Commission

Re: Docket No. 93-11-108

I am asking for clarification on three points related to how this hearing and the subsequent ruling based on the evidence supplied here will effect and direct the remainder of the process. I am asking that I may better direct my testimony and questions in this proceeding.

1. My prefiled testimony dealt with issues of environmental concerns that might be appropriately addressed in the CEQA portion of this process. However, Sierra identified a major "need" (project objective) as Reliability for the Reno, Lake Tahoe area. The reliability was directly related to the proposed routing of the project with the identification of a site-specific point of termination. Thus, routing became a component of need. What I would like clarified is how a finding for "need" at this hearing might subsequently constrain the environmental review of the Draft EIR/S statement in those sections addressing justification for the proposed routing and the final point of termination. I intend to challenge the draft conclusions under CEQA process related to those sections and would like to know if it is necessary and desirable to do so at this hearing as well. GP. 14-29

Roger Olack also has said routings other than those in the applicant's proposal should not be considered. He asserts that any possible alternatives located primarily in Nevada were appropriately studied prior to making application in California and adequate justification existed for their dismissal then. He asserts that the need for this project by Winter 1996 is a critical element that not be met if further an alternative routing utilizing the existing corridor in Nevada were included now for further study. If you will be making a decision in support or denial of these particular assertion as part of this hearing, please let me know before testimony commences on these issues. GP. 14-30

Concerns and comments to be addressed through response to Draft copy of EIR/S

2. If a plan for compliance and mitigation for EMF is not fed into this process at this point (but during the draft EIR/S comment period), how are citizens guaranteed a review of the plan? If the routing is through California most of the way, would the California Public Utilities Commission insist on consistent standards for portions of the route in both Nevada and California? If the route were rerouted to run primarily in Nevada, would California's position on the standards for the entire line remain in effect? Will mitigation involving low cost measures be applied by the power company on a prorated share, or since that is a California "order", would it be only for that portion that runs in California? Will the CPUC be assuming responsibility for compliance in the review process and in the construction process? This is particularly important if they allow the to credit for the low cost measures Sierra proposes for segments built in Nevada.
Will the CPUC be following up to assure that mitigation ordered results in the benefits they are supposed to and which state agency will verify these achievements in which parts of the line? GP. 14-31

By the way, this was ~~pack~~ related to the second motion

Concerns to be addressed as part of comments to Draft EIR/S

Initially, the Forest Service position was that Forest Service lands should not be impacted by this line and alturnatives considered. I refer you to your comments, as published by the CPUC in th Scoping Comments Appendex for the Alturas Intertie project. [redacted]

Although it is not the position of the Forest service to accept land with specific encumberences, the recent land trade through the Nature Consevancy and Friends of Pevine that added the acres from Granite Construction to the Forest Service represented a substantial commitment on the part of many people to attempt to preserve and enhance Peavine. With the proposed routing of this project, this parcel will be bisected by this powerline. I feel that the Forest Service is acting in bad faith to accept this land in the name of preservation and then sponsor its use as a utlity corridor. There is no way this use could be compatable with the objectives of the exchange.

GP. 14-32

1 S.C.C. X

repr pag

In the past two years, the Forest service also voiced a commitment to take action that would result in enhancement of thePeavine area ajacent to Reno. They pledged to clean up the area, restrict the destructive four wheel drive activity that was tearing up the mountain sides and help restoreand protect the beauty of the mountain. The Forest Service asked for and got participation from the public and the neighborhoods that share the edge of the mountain with the Forest Service. To allow the use of the particularly vunerable borders and having this Utility corridor as a gateway to the mountain almost guarentees that this work will be undone. People don't get inviolved in caring for a power corridor the way they get involved in preserving a mountain.

In the vicinity of urban Reno other parcels of Forest Service land impacted by this routing proposal were designated as disposable. However the land use to be obtained by from trades has been recognized, and an exchange on a particularly sensitive area has been identified. The area between Raleigh Heights and Mc Carren Blvd. has been labled Open Space by virtue of its recreational value and its senic quality in connecting the City visually from the north of Rancho San Raphael to the top of Pevine peak. The Open Space designation was approved by all Planning and Goverment entities in the City of Reno and Washoe County.

Since 1986 the trade of the next parcel of land from Forest Service to the Washoe County Parks has been planned, adding to the Park.. I would hope that the forest service, who insisted on trading out of the land because oactivity proposed on that parcel was deemed inconsistent with proposed on the parcelis not making some type of accomodation with the power company that will result in the park getting not only a barrow pit but a 345,000 power line corridor through the park as well. It is not in the best interest of the park to inherit a piece of land that is further degraded, especially since this the positioing of the line will not reduce the impact on the other forest service property involved in the routing.

In any case, We would like to point out that the piece ofd Forest Service land has always had recreational value. Not all recreation is incompatable with power lines. Sierra is quick to point out that in some areas Existing powerline corridors are sought out to provide extra space for some type of recreation. It occurs to us that this may be the case in areas where all available lands have been built on and under restrictive uses. Even then, I doubt that 345kv corridors are the type people willingly spend time under. I cannot, for instance, imagine anyone sending their children out to play under one of these lines. They have a noticeable buzz and the electrical field under these is certainly strong enough to be felt. In any case, I do not see though people going out of their way to solicit powerlines in ther parks or openspace to enhance the recreational value of what is already provided there.

I recognize that the Forest Service feels that the impact of this powerline will effect only a very small part of the Forest Service Resources. I am concerned that what is not addressed is the precedent that is being set, both specific to this case and as a general policy.

On this corridor, I don't feel that the Forest Service will be able to say no to additional similar uses or any other users in this vicinity. In [redacted] letter during the scoping process, [redacted] indicated the same thing. I also see the Forest Service as not being able to disallow similar uses in other areas that the Forest Service may want to protect from similar useds , including all areas Forest Service Land that is ajacent to rural residntial

2

housing, Public Parks and Open Space, even if, like the Forest Service Land next to Rancho San Raphael Park, it has recognized recreational value. If this corridor is established it will allow the border of Forest Service Property ot be used for Industrial type infrastructure. It is not compatable with the type of land use that is mutually beneficial to these particularly sensitive border areas.

Other precedents set by raised in this case that will be undercut include 1. Issues having to do with the use of existing corridors, including existing designated corridors. When the Forest Service makes the land availabel to and what commitment the the forest service has to accepting land for preservation. lands ajacent to forest service prooperty. Issues wherein the Forest service ceedes border property to investor owned utilities without these utilities going through the process to apply for a corridor, I can see only further problems. If the Forest Service sees a need for a Corridor through tis area, then utilize the entire forest Service land to determine the beest place to put this corridor through, minimizing the visual effects, combining more 1. The Forest Service Owns large areas of land. Rather than just accomodating these investor owned utilities and giving them the most directand the cheapest way, utilizing the public's resorces forthis purpose, Evaluate the best way utilizing all the Forest Service resources to get this line across.

GP. 14-32

Reference E3.3.2
Document EIR/S
page E-5

Question \ Comment: Nowdow Sierra's interpretation of the 1992 Energy Act Relate to other utilities tying in for transmission services at the substation, once established, is it Sierra's position that they can legally deny access to their transmission facilities by other utilities such as TANC, who may want to interconnect at Bordertown for wheeling? what level of commitment is Sierra Pacific willing to give the Bordertown & Hilltop area residence that Sierra will limit the interconnections at those substation sites? How likely is it that, once establishe and de-regulation takes place that every one who will be able to get to Bordertown or to Hill top won't immediately do so. How these projects are not inevitably compounded is hard to swallow.

~~Context and/or Rational~~:

~~Reference~~:
~~Document~~:
~~page~~:

Question \ Comment

GP. 14-33

Context and/or Rational

Reference: B-61
Document: EIR/S
page:

Question / Comment Alternate Substation Site at Stead area eliminated... "growing in longjed area."

~~The main reason that~~

The whole rational behind allowing the siting at Bordertown has to do with eventually providing service to the "fast growing North Valley area." If you can't get a line into ~~Stead~~ Stead now because of significant land use impacts, please explain how some 10 years from now you will be able to gain access in and out of this site to save running "an additional

Context / Rational

GP. 14-34

3 See X or X Ext

line from the North Valley Road substation." Keep in mind that the existing line to Stead has never been upgraded to full capacity.

If you are concerned about running a 345 KV line into the urban area, please explain the justification for running the 345 through the urbanized area around N. Valley Sub as proposed.

If you would have trouble running lines in and out of the Alternative Stead site, why do you feel that you will be able to expand as needed out of the North Valley sub site?

GP. 14-34

~~The alternatives totally omission~~

Reference
Document
page

Question \ Comment : Transmission improvements provided by Alturas allowing Nevada Geothermal energy producers to access bigger markets

Context and\or Rational :

Reference :
Document : 1995 SPPC letter ~~cancelling firm contracts~~ canceling firm Geothermal
page: contracts

Question \ Comment The Alturas project has had + will continue to have a long term detrimental impact on geothermal Resources in Nv. Sierra Pacific has cancelled its firm contract for geothermal in anticipation of utilizing Alturas import capacity ~~instead~~ instead This should be addressed as an issue in the draft. If you look at Sierras revised ~~tariff~~ estimate that

~~Context and/or Rational~~

they submitted as part of their testimony for the May 23 CPUC hearing, the 1996 availability of firm resources shows a big drop. This is traceable to the fact that geothermal contracts with Nevada producers were cancelled.

Reference :
Document : Hearing 5-22, Susanville, Cal CPUC
page: day one - public Comment.

Question / Comment A geothermal party provided comments related to the development of transmission access w/ Alturas and the growth of Geothermal ~~off this is part of the second and best~~ resources in Northern California. Please note that, in terms of routing, the largest and most likely to be developed resources ~~in the area~~ geothermal resources in Northern California could take better

~~Context / Rational~~

advantage of the Nevada Alternative routing than the proposed.

FROM LORI BURKE

Reference Appendix E Biological resources, Alternative Mitigation Option
Document EIR/S
page E2-25

Question \ Comment: part 2 "Obviously, undergrounding ... 10-30 times that of over head..." I don't feel that this is at all an accurate representation of the cost of undergrounding, even in areas where birds might be. The cost of undergrounding is 3 ~~and~~ 1/2 to 4 up to 10 times, + is site specific

Context and\or Rational:

GP. 14-37

Reference: A.6.9.1
Document DEIR/S 3-95
page: A37

Question \ Comment At the point of interconnection to the SPA line in Alturas, Cal., how much of the energy at that point is hydro? SPA may generate + sell a great deal of hydropower, but by the time the transmission system is integrated with other North West Power producers, the hydro to "other source" generation energy must change. "Other source" would include nuclear, coal fired, oil fired, etc.

Context and/or Rational This is significant since your report indicates that the power source for this line is ~~that~~ environmentally superior water power, making this project attractive. Actually, what we will be using if we tap in here is the other sources that supply the line, since hydro power in the North west is ~~Reference~~: already oversubscribed and we are not a preferred customer. If ~~Document~~: ~~Page~~ we are tapping into a ~~dirty energy~~ source ~~the~~ and ~~page~~: the Alturas interconnection will utilize primarily the "dirty ~~Question / Comment~~ energy" available from the SPA connection, I would feel this information is critical, since an alternative ~~strategy~~ improving our own clean geothermal resources are an option if we are passing the polluting effects of production of "dirty" energy off to another area.

~~Context / Rational~~ Please also evaluate this in terms of the fact that Reno has peaks that do not coinside with availability of hydro, yet this line is justified in part by a need for support during peak periods

GP. 14-38

Reference
Document FIR/S
page B-64

Question \ Comment: Please explain why reliability would not be addressed by Pinion. This qualifies as internal generation. If the Valmy plant were down, Pinion would replace capacity. This ~~mean~~ translates directly into reliability. Credit must be given for the fact that there must be a reliability improvement over Alturas since the power doesn't have to travel from dams up in Washington all the way down on transmission lines into Reno. This source is tested in the ~~The Pinion document~~ Pinion application as being particularly versitile and consequently more reliable. When the application for Pinion was submitted by Sierra, its location in Tracy was supported in that document by assertions that the distribution system from Tracy was both adequate and reliable. This conflicts with what Sierra is presenting as a "problem" when reliability is discussed relative to the Alturas interties. Please address this issue

Context and/or Rational

GP. 14-39

Reference: Page B-65
Document: Ft. Churchill Combustion Turbine. If Pinion, integrated into the
page: Central District cannot supply reliability to the Reno & Sparks
Question / Comment area, and Churchill CT's can't supply only limited reliability, and Alturas is a soft source dependent on generation from dams in the pacific North west, Please do an analysis of what Aspen and Sierra Pacific consider to be a reliable source
Context / Rational of power for the Reno ~~the~~ area

GP. 14-40

Reference Intelie Alternatives to No Power
Document Draft E/R/S
page B-63

Question \ Comment: Statement one. "only partial relief." Where is the full need for ~~300 mw~~ KW of capacity as "need" documented in this document? Would 200 do the trick? ~~Statement~~ Would 50 do the trick? All Sierra says is that ~~a~~ they can use all they can get. This hardly qualifies as "need."

~~Context and/or Rational~~ Point 2. Sierra Pacific has been directed by the Nevada Public Service commission to make interconnection with Nevada Power. Sierra also ~~[illegible]~~ has ~~a~~ access to the Pacific Northwest with its current intertie that no one has intimated is not "cost effective." Since Sierra could utilize the Nevada alternative and other existing corridors between the two areas, why didn't you independently analyze the ~~[illegible]~~ alternate routes? Sierras contention that it would not improve reliability to the Reno/Lake Tahoe Area is ridiculous. Interties into any point with a new source into the Central District will improve reliability. Any interconnection of a Sierra / Nevada Power Co. intertie would probably allow and involve a possible interconnection at Mira Loma substation. Mira Loma substation has 345 capability, is as desirable as the N. Valley Road for interconnection, according to Sierra's own Central District Plan. Furthermore, the Tahoe load is ~~served~~ served ~~[illegible]~~ also from ~~the~~ the ~~[illegible]~~ Mira Loma substation. The alternatives that intertie to Nevada Power Company would ~~[illegible]~~ meet all project objectives and should not have been eliminated from further consideration without independent analysis. ~~[illegible]~~

~~Context / Rational~~

~~Reference~~:
~~Document~~:
~~page~~:

~~Question / Comment~~

~~Context and/or Rational~~

Reference Geothermal
Document E/R/S
page

Question \ Comment: ~~"Transmission provided to Nevada Geothermal producers to allow them to reach bigger markets."~~

Context and/or Rational:

Reference: ~~A-67~~ A 65
Document: E/A/S
page: A-27

GP. 14-41

Question \ Comment "Improved service reliability." Dot one Please fully explain how the project routing is related to this goal.
Furthermore, please explain why this project will improve reliability to Reno/Lake Tahoe and not to Sparks, West Valleys + North Valley too. (Carson ~~[illegible]~~, Spanish Springs)

GP. 14-42

Dot 3 Please incorporate as part of this project the timeframe ~~Context and/or Rational~~ ~~and~~ for the transmission service facilities as being available to the North Valley. Co-ordinate this with need you figure will ~~secure~~ trigger this utilization of improved service, and provide a rough idea of how you will route this power into the North Valley substation(s). If you can't upgrade the existing line because of constraints on existing corridors and you can't get into the substations now, please provide information on how it will be accomplished in the future.

~~Reference~~:
~~Document~~:
~~page~~:

~~Question / Comment~~

Context / Rational

Reference Eastside Route 2
Document EIR/S
page B-58

Question \ Comment: USFS lands crossed by the segment ment X and Y are horribly misrepresented by the statement "not a high use area." Segments X and Y are very high use areas, both by people who live adjacent to it, by recreational users who travel to the area to use it and by just use of its extension into Reno's Sun Ranch. There are dozens of bicycle trails, running trails, flower observation paths ~~paths~~ plus the areas around the Verdi Reservoir

Context and/or Rational: The area is rich in developed recreational resources, + these uses are not compatable with ~~[illegible]~~ the expansion of high voltage visually blighting corridors. The current route also ~~has~~ crosses rough terrain and a large canyon over the

~~Reference~~:
~~Document~~: City of Reno park land; not to mention the open space adjacent
~~page~~: to Keystone Canyon. I live in this area, I ride in this
~~Question \ Comment~~ area and I walk allover this vicinity at least a weekly basis. This is a high use area.
Relate construction impact to the crossing of Evans Creek Canyon

(Con't) B-59 The "future residential devel. in the Lemmon Valley area . . "

Context and/or Rational certainly does not compare with the significant planned urban development + existing development along the preferred Route. I mention in ~~particular~~ particular, Murphy Bros Homes development.

Reference: Anderson Ranch, Hunter Hills, etc are all areas the proposed
Document: routing acts, but future development there is not balanced
page: in this report. Further more, the route ~~probably~~ immediately
Question / Comment ~~[illegible]~~ North of North Valley Road's location is not residential but in fact industrial. Residential developm. is not more dense if you go a North east direction + then North before hitting Sun Valley. It is hard to imagine how

Context / Rational you could not route this line further than 300 feet from residential development in ~~[illegible]~~ Golden Valley.

Con't over

GP. 14-43

GP. 14-44

Obviously, in the area around segments X + Y, the use of these areas to route a interstate transmission corridor is not compatable with the landuse goals and policies in the area. No routing through this area, if the elimination process you use to eliminate alternatives to this segment, is possible

GP. 14-44

Reference Document page: A-27 Reliability

Question \ Comment: In your entire section B, you provide no information as to why there is a difference between what you refer to as a reliability ~~of~~ view of Reno/Tahoe, when there is no separation between Reno/Sparks, Tahoe, Tracy, Mira Loma, etc as part of an integrated Central District. If Tahoe

Context and\or Rational: has a reliability problem, it is not independent of any associated problems in the Central District ~~and vice versa the same~~ ~~problem between the central~~

You offer no evidence that the interconnection with

Reference Document page: Altamas will provide ~~[illegible]~~ particular reliability to the

Question \ Comment: Reno or the Lake Tahoe area independently of its interconnection with the Central District. This is critical because interconnection with the central district can be accomplished at Tracy, at Mira Loma and at North Valley. Alternatives that provide interconnection at these points, or alternatives that increase reliability within this area, such as Pinon, ~~[illegible]~~ to

Context and/or Rational: ~~impossible~~ interconnection at North Valley Road. Why the ~~applicant~~ is this document does not clarify this is a problem that confuses the

Reference Document page: alternatives and the choices being made. The reliability

Question / Comment: Sierra makes a big point of the 345 East Tracy-North Valley Reliability. In addition at any point that 345 Comes in would have the ability to redistribute the load in the Central district to offset potential overloads on this line per the exact reasoning Sierra offers as part of its justification

Context / Rational: for not dealing directly with the problem on page A-27 (the bottom) and over the page "A-28. ~~Not only this~~ In addition, the ~~the location~~ at location of the terminus is totally unrelated to

over

the ~~term~~ goals you discuss as part of this ~~alterna~~ reliability issue on the last sentence of the 4th paragraph. Any interconnection into the Central District network would accomplish both those goals. Choose project specific - not routing specific or site specific.

Your document is deficient in that you allow Sierra to inconsistently justify ~~[illegible]~~ interconnection to North Valley ~~[illegible]~~ as a necessary component of interconnection to the Central District. This is not the case and you fail to sufficiently ~~the different~~ ~~difference~~. Your letter ~~to~~ from Dan Woods indicates that the questions you asked Sierra were to justify connection into North Valley. You did not ask ~~them~~ evaluate if the same objective could be met by ~~any~~ a new ~~line~~ corridor being introduced into other points into the Central District.

Every engineer I spoke with indicated Reno/Tahoe reliability would be ~~[illegible]~~ enhanced from any other 345 interconnection in the central district system in a reasonable manner. This certainly makes the idea of crossing either Reno or Sparks urban areas ~~[illegible]~~ look much more like an alternative than a necessity ~~a path to get 345 [illegible]~~ to. It would create a path to Border town to facilitate the wheeling of power out of that facility ~~[illegible]~~

~~[illegible]~~

There is ~~potently~~ possibly a degree of benefit to interconnecting with the Central District at either Mira Loma or at North Valley Road in terms of ~~reliability~~, rather than involve the ~~[illegible]~~ reliance on the 345 KV lines at Tracy, but to demonstrate this, several things must be addressed.

GP. 14-45

GP. 14-45

Comments on EIR/S
A-26. "Purchase from Neighboring Systems"
Would Alturas allow Sierra any NEW markets? Sierra's major intertie is into the same market, as far as I can tell. They would not be able to buy and sell to any additional markets and there is no evidence that to buy from Alturas via Pacificorp and BPA would be particularly cheaper than to buy from the existing intertie. I am also not convinced that you have adequately considered how much firm energy could and will be converted to "economy energy" via an additional NWPP intertie that to any transmission alternative which would increase the import capacity of Sierra's whole system, no matter where the interconnection is made. I am asking whether benefits for the importation of "economy energy" is associated with the location of this particular intertie, or if any intertie would open up the potential for additional capabilities to NWPP markets, and to what degree. This is important when trying to figure out how, system wide, different alternative might contribute to an over all solution. GP. 14-46

I also request that you re-evaluate all alternatives relative to how Sierra Suggest solving the problem of additional support to the fast growing Spanish Springs area of Sparks within its own Central District. Sierra's solution to that problem was basically the assertion that the addition of electrical augmentation into their system would allow them the flexibility to shift loads around at the district level to relieves stress on particular lines, such as had been identified in Spanish Springs. If this is the case, then we would like you to evaluate the flexibility that would be gained in this manner to solve all problems, including the anticipated problems in the "fast growing" Stead area that is used to justify the selection of the Bordertown substation site. This comparison is needed to evaluate the need for Alturas as opposed to, say Frenchman's Tap, as well as the selection of the Bordertown substation.. I want to identify more particularly what type of benefits are site specific, district specific, and overall system specific. I also want to assess whether a WSCC analysis as the limits that would apply, kw to kw, to the potential ability to raise the import limit by more fully utilizing an existing capability but drawing from another area than the Pacific Northwest, as discussed in A-24. GP. 14-47

Compare this with Alternative such as Frenchman's Tap. (In the chart showing comparison of the "alternatives", there is no mention of the potential value to Sierra to open up additional access in the other direction (south), as opposed to the Pacific Northwest.

There needs to be a much more in depth amasses of the WWP and Sierra Pacific merger. If this merger is approved, will enough resources be opened up to substantially offer enough benefits to make the Alturas project unnecessary, in several respects? I refer particularly to the shared reserve requirement. I have seen no evidence presented to indicate that Sierra is lacking the existing transmission infrastructure capability (along with internal generation they use now to augment their transmission loads) to import more energy provided the import capacity restriction is raised. If Sierra and WWP merge and the reserve requirement is raised, what would be the affect on the need for Alturas. How important is the interconnection between the systems to effect the generation reserve requirement, and how important is the point of interconnection to how loads would or could be serviced. I would hate to see this project go ahead and then find out that the merger alone would have raised Sierra Import capability enough to solve their problems relating to that. GP. 14-48
Sierra has presented their side that this line will be enhanced by ther merger. Sierra has not provided any information about how the merger could be used to reduce the need for the line.

On page B60, please reevaluate the location of the Alturas powerline in the close proximity and in the engineering constraints specific to the section where it parallels the existing two powerlines and the gas pipeline in Washoe county (both on the west and east side of Old 395 North Virginia Street). Please do this consistantly and consider the problems of interaction between the electric voltage and the metal pipeline. I would like a complete analysis of the single and double pole structures through here as that is what is proposed. I am aware that considerable constraints are caused by the steepness of part of the route and the soils type and displacement the area.. There are places where the clay soils are 12 feet deep. GP. 14-49 GP. 14-50
Sierra aslo plans to take credit for the " low cost measures" to reduce EMF, but the engineering, according to Owens (please see letter) was done as an economy measure. All Sierra would do if the took credit for the EMF reduction would be to change the place they measure the EMF. All this area is open and excessable, with most of it being in the public recreation area of San Raphael Park This is the area the will go through the regional park as well as in the area with considerable residential construction. Before this project is approved, a full analysis of what would be necessary to get the line through is needed in order to evaluate exactly what would be needed where. There is very little room for alteration of the line at a later date excerpt routing diversions that would significantly increase the cumulative impacts, further degrade the area and add concerns about public health and safety, especially in conjunction with the heavy recreational use of the park. You have also failed to address the effect of the annual Great Reno Balloon Races in the park area. This is a concern not just for the balloonists but for the crowwds tthat roam and cover the hills to watch. You should also consider the decrease in the visual quality of the most practiced "Sport" of the whole race, i.e. taking pictures. GP. 14-51

Comments on
Possibility of using the North Valley Sub to replace
Bordertown Sub

~~Rebuttal to testimony of John Owen Owens~~

First may I point out that there is considerable disagreement as to the amount of construction that this project of expansion in the area of the Valley road substation to substitute for the construction of a whole new substation at Bordertown. . I will also point out that the 8,000,000 figure that Sierra quoted to Aspen and which Aspen reports in its document (page B-62) has now been ammended by Sierra down to three million.and this figure is still not as low as it will probably go, since Sierra is still including various other projected costs and not recognizing significant savings. It is more likely that constructing the Bordertown Substation Site is more expensive than utilizing the existing space on their 50 some acre parcel in Reno.

I am assuming that the expansion would not include the extra space for an additional phase shifter at this time, although there would be room for that at North Valley Road, as well. What Sierra has not established is why another phase shifter would be needed in any case, and why it would necessarily be located at Boredertown, anyway. Certainly not to serve its native customer load.

What is important is that an expansion of this North Valley substation would be a expansion of the same type of facility in an area that is already appropriatly zoned and developed for this type of facility. In addition to Sierras electrical facilities of the Valley and the North Valley subs, there is some type of generation facility and two major Gas facility, all of which are much more visually prominant than the expansion that would be part of the Bordertown replacement facility. Sierra owns a big chunk of land (at least 54 acres) and this proposed expansion is about in the center of it. There is plenty of vacant land available. If you add up the acreage of the various utility use in the contiguous area and throw in the industril plant that manufactures headstones, you will find that the addition of the Bordertown substation replacement addition will represent a minor increase in the total amount of land in this area that is used for these purposes. It would also not add to the visual impacts pacts since no matter what is done, the character of the area is already established by what is there. I appreciate Mr. Owens concerns about the impact of what people will have to look at, but I might add that Sierra has never offered to do any mitigation to lessen the impact of what is there for the 40 + years of its existence, and was not incorperating any visual mitigation or visual enhancement associated with the smaller expansion they were proposing to this area as part of this project, in any case. In Sierra's assertion, through Mr. Owens testimony, that an expanded project would not be permitted by the City of Reno is not credible. I don't think the City would be able to stop them, particularly if the City is getting the benefit.of this power. Why Sierra County would be asked to put up with the visual degradation of the historic Long Valley area to preserve Sierra's 50 acre existing substation site in the heart of half a dozen examples of cut and fill and three major unsightly utility facilities is the only question here, especially if Sierra county doesn't get the power and Reno 's "need" is what is driving the project. Additional point relating to this assertion was done inconnection with exhibit JCO-12. This was an areal view of the area that did not represent the topography or the type of visual barriers that are present accurately.There are three groups of people who would be impacted by the construction , either as part of Sierra preferred plan or as part of an expansion to relocate the Bordertown facilities to the North Valley Road site. The first

GP. 14-52

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group wold be on the residents over the hill and to the west of construction. They would not be visually impacted , but might hear the work These people however, are already experiencing construction activity related to addtional houses being built right in their neighborhood that would supercede annoyance from this project, The neighborhood build out will continue after any substation work has been completed.

The second group of people would be the residents who live within sight of the existing Valley Road and North valley road substation. The majority of these are small densely populated modular / mobilehome communities planned and built in the past several years. One in particular is totally sheilded from the site of any of the existing utilities by a big cut into the hillside that was done specifically to sheild the people from that view. This would be the Sun Villa estates, and they are the closest in proximity to the site of expansion. Additional Mobile home commmunities are being built in the area, but these are further away, and the developers are building these with visual barriers, as well. In any case, to see to the new addition, these people have to look over the gas transfer station and the existing Valley Road bus work. to get to the view of the expanded substation. The build out of these areas which are almost complete will be the last residential construction in the area. to the Northeast of Comstock Hill.

I am quite sure that Sierra, could come up with mitigation plans that , if applied to the proposed substation expansion and to the existing substation facilities would more than adequatly make up for the any temporary inconvenience and noise they would have to put up with. The type of mitigation I am talking about is what Sierra now proposes on the new substationsby way of utilizing landscaping techniques and plantings to make facilities less visually obnoxious than the older ones, such as Valley-North Valley Road substation. If Sierra were to apply these tecniques to the existing ,as well as a new facility or expansions at Valley-North Valley Road, possibly the over all visual quality could be enhanced. This would also benefit the third group of people visually impacted, those being the people who drive past the existing substation on the local arterial, Mc Carren Blvd.

GP. 14-52

In any case, I do not feel that the a substation should be utilized at Valley road.to accomodate 345kv interconnection. There is not an acceptable way to get that voltage line through the surrounding area and into the substation that compares with the alternative of utilizing the space adjacent to the D C corridor and terminating the line near Tracy. I offered this as part of my initial testimony questioning the logic of using a Substation at Bordertown as a constraint of routing into Reno, if a 345 Kv line was coming in anyway.

GP. 14-53

2

Comments on Draft EIR,

Q. ~~Do you believe that multiple 120 Kv lines are less visually obtrusive than a single 345, especially when 3-5 are required as Mr. Owen and Mr. Nelson testify?~~

Source Pg B 87

A This relates to the alturnative mentioned above that would use the DC corridor and would terminate at the vicinity of the existing substation there, Tracy. (The reason I am not more specific about how an interconnection would be made is there are several possibilities involved.) Sierra ~~[illegible] my suggested alternative to say that I would like to see one 345 replaced with a bank of 120 kv's just replacing the bulk transmission capacity of the proposed 345 into and through Sparks into Reno. This is not at all the case.~~ My suggested alturnative is to INTEGRATE additional power and capacity into the Central District from Tracy, just as one would have to integrate it were it to terminate at North Valley road, as proposed. I do not advocate the construction of additional 120 Kv into the Truckee Meadows area except where it will be needed, and then only as it is needed, to serve the area. We don't need bulk transmission capacity coming into Reno via an additional 345 kv line or a bank of 120 kv lines, The addition of the 345 kv line is not going to save any 120 kv construction related to the needs of the Truckee meadows area unless we want an entire ring aroung the Trukee Meadows at 345. I don't believe such would be even a remote political possibility. ~~The~~ Reliability into the central district of the Truckee Meadows that will be added as a result of the alternative ~~[illegible]~~ backs up It would capability to the Reno/Sparks area and will bypass system problems of 345 lines East of Tracy ,or a shut down at Valmy. This will provide system reliability, a big component of entire reliability issue that has been raised. This possible contingency was certainly given as a primary reason for reliability concerns by the company when this project was initiated . GP. 14-54

In the draft environmental document, the conclusion that the termination of this line is necessary at North valley road is incomplete and flawed.
September 4 letter from DanWood is a case in point. Point one is not addressed, since ,as far as I know, Sierra has no firm commitment to import power over this line, assuring availability. It is also possible that the full 300kv capacity on this line is commited to serve other utilities.
Point two of Mr. Woods letter mentions only one of several alternatives that could solve the problem of the increasing flow. If a path were opened to the East from Tracy with out having to go through Reno ,several alternatives utilizing the 120 kv system would open up. If the system were to enhanced from the Tracy substation and looked at as a whole system with the possibility of being reinforced from Tracy, it could be done. The variety of alternatives that are part of the 1990 Electrical Master Plan mention several possibilities. Two things in that document are(a) the assertion that the addition of 345 into the system will not reduce the 120 kv construction that will be required, and the only reason for the need for the 345 into the North Valley Road is " to reduce the reliance of the system on the 345 kv buswork at Tracy". This could be accomplished by inter connection at either North Valley Road or at Mira Loma substation. GP. 14-55

1 Reliability per section B
"Alternatives" per the same section

If the Alturas system were hooked in at Tracy substantial relaibility behefits would occur. Independent of the enhancement of the 120kv system distribution system by the addition of an additional independent source of 345, there is concern that the buswork at Tracy would still be a point of exposure. This exposure is a component of reliability, but in order to asses its significance, several tissues and possibililites must be raised. Are busses the site of common problems? Are there adequate measures in place to to insure bus protection? Are there enhancements or retrofits to older busses that might improve reliability ? Could new unrelated buswork be installed in the vicinity of the Tracy sub that would aviod the existing buswork? in any case it seems that this limited exposure would not by itself justify the additional expense and degredation to the urban areas that would be necessary if the line were to go into the urban areas through either Reno, Sparks, or Washoe County. GP. 14-56
None of these were considered in the draft.EIR/S, yet these possibilities were the first ones mentioned by people, including electrical technitions and engineers here who are familiar with Sierras System but are not part of the Alturas team.

According to my contacts , interconnection at Tracy would allow for other enhancements to improve service and reliability. Reliability West of Tracy will be additionally enhanced by the addition of the Pinion Power Plant, whether or not Alturas goes in as planned. Reliability, as well as additional capacity, can be further acheived by double ending existing transmission lines in the vicinity of Tracy to the Alturas line as opposed to the Tracy -Valmy source This would be equivelent to adding capability at Bordertown to step down power to the 120kv .Having an additional source of 345 power at Tracy will a new support source of electricity to the growing areas of Sparks/ Spanish Springs which is certainly more of a growth area than the North Valley area.Future development could utilize a connection with facilities at the Tracy end, rather than expansion fromValley Road Substation across Sun Valley.and the developed parts of Sparks. Step downs from 345 kv at Tracy certainly would not have to be as much as 120kv. 60kv or smaller could be utilized as needed. GP. 14-57
Finally, there could be the possibility of adding a backup from the Tracy side to run a second 345 parellel line to the existing Tracy- Mira Loma Line.utilizing an extension of the the Alturas source. There is also an option to utilize the path from the Nevada Alturnative corridor in to Tracy , but not hook up at Tracy. and to parallel the existing 345 path between to interconnect with the Central District at Mira Loma directly from the Alturas source. This option would avoid the exposure at the Tracy 345 bus. I do not believe that the area between Tracy and Mira Loma substation (also a 345kv facility) is constrained by urban development or land use conflicts such as are present in the existing path betweenTracy and North Valley Road or the proposed route across the eastern side of Peavine. These are the type of measures that will substantially increase reliability in the Truckee Meadows area without any areas of the Truckee Meadows , either North Valleys or Sparks trying to absorb the impact of a 345KV line or a bank of 120 kv lines to

2 Reliability, per section B

GP. 14-57

replace it. Even Sierra Pacific does not say that Reno would need any where near the capacity of a 345 kv of energy to "allow for growth."

As always, the issue might come down to money, the additional lenght of the line and the possibility of sites on the Nevada alturnative for Phase shifter site outside of the existing substations.
Money. The line length that Sierra quoted for the Nevada Alturnative would be reduced by the distence between Tracy and Sparks, and the substantial premium that Sierra undoubtably added to theNevada alternative associated with crossing this area.
The length of this line should be considerd in the context of where most of this power is going. By avioding routing through Reno, the Nevada alternative provides a pretty direct route through Nevada to the mines and markets East of Tracy.
The Nevada alternative would allow for siting opportunities for a substation adjacent to Tracy or on private or public lands within the same range of distance between what is proposed from Bordertown to North valley road. It should be possible to site a substation that would avoid the serious problems encountered at the Bordertown site., since the land use around the Nevada alternative intersection with the 345 corridors is already encumbered by utuilities

GP. 14-58

A look at the map would seem to indicate that Incline (Tahoe) reliability could be enhanced from the East side of the system, just like all the other interconnection. It also apperars that Incline/ Tahoe is already "Double Ended" so is not solely dependent on a supply from North Valley.

GP. 14-59

Sierra may say that the degree of reliability offered by the proposed alternative through Tracy is still not what it would be with the direct interconnection with the 345 at Valley Road. The degrees, I am unable to argue about. However, It should be pointed out that in the section in the vicinity of Keystone Canyon Evans Creek Canyon, Rancho San Raphael the North Valley Apartment Complex, and the area to the east of 395, WSCC criteria related to reliability are being violated by the proximity of the lines. This would also undoubtably be the case if a 345 were run through Sparks to North Vally Road Substation. That reliability cant be met in these populated areas should also be part of the equasion of benefits vs liabilities in the various routing options.

reliability per section 3

3

Comments relating to need

GP. 14-60

Sierra is anticipating that they will increase import capacity of thier system by 300 kv with the project. The capacity will be used to further other objectives. according to exhibit LB7 the largest portion of this capacity will go to serving the BPA power customers that Sierra provides transmission service to. According to this exhibit, the benefits to BPA include a new "path", so I assume they would be sending it in to Sierras transmission system through the proposed intertie at Alturas. The second major user would be WWP and Sierra as a combined company. This power would not be imported through the Alturas interconnection as energy would probably be actually channeled in through the existing Idahoe intertie in the north eastern part on the state,.since the import limit would be relaxed. Resources are closer to that point than to Alturas. I expect this energy would be available to serve and expand the Sierra / Washington Water Power transmission customer base through those interties. The remainder of the energy would be utilized to serve the growing needs primarily of mining customers in the Eastern part of the state that is fueling the System wide growth of Sierra, as well as provide additional sales to transmission customers outside of Sierras current service area who want to have access to some of Sierra's power. These would include Plumas Sierra REA, Truckee DonnerPUD (which is expecting to get 30MW of capacity off this line, according to their testimony at the CPUC hearing in Reno) and possiblePG and E customers. Power might also be would also be available to expand the supply into the Central District, as referred to in the "Reliability" I addressed above. Most of the capacity that will be brought in as a result of this project will not be to needed to supply the growth that is projected within the Truckee Meadows area of Sierra System. This must be addressed in light of the Geramendi act,as well as the laws under which LADWP was granted this easement.
The availability of the Nevada alturnative to keep this Interstate project energy on an existing interstate transmission corridor must be fully addressed.

Comment re: above
continued on page 8

05/09/1995 07:52 9162335430

Department of Energy
Bonneville Power Administration
Redmond Customer Service Center
3666 West Highway 126
Redmond, OR 97756

April 7, 1995

Mr. Dan Silveria, Manager
Surprise Valley Electrification Corporation
P.O. Box 691
Alturas, CA 96101

Dear Dan:

On March 30, 1995, you called me with some concerns regarding Sierra Pacific Power Company's (SPPCo) proposed 345 kV Alturas Intertie Project. The transmission line would span roughly 161 miles from the vicinity of Alturas, California to Reno, Nevada. Currently the project is expected to be rated bi-directionally at 300 MW. The Bonneville Power Administration (BPA) has the option to use up to 110 MW to serve BPA's Northern Nevada transfer loads including Wells Rural Electric Company (WREC) and Harney Electric Cooperative (HEC). Contingent upon agreements currently under negotiation, SPPCo and Washington Water Power (WWP) will use up to 90 MW for transfer between each other. SPPCo will use the remainder for its own use.

Your concerns were related to the benefits provided to Surprise Valley Electrification Corporation (SVEC) and BPA as a result of completion of the project. Please understand that the contracts have not been finalized and that this information is subject to change.

BPA benefits from the project in that WREC and HEC could be served more reliably and at a substantially lower cost. In addition, BPA's interconnection with the project provides some support to the Northwest Intertie during outages. But most importantly, BPA's interconnection with the project will be achieved at essentially no cost to BPA.

You also asked how much capacity would be coming off the 230 kV Malin to Warner line. As I understand today, that could amount to 110 MW for WREC and HEC, and from 50 to 90 MW for SPPCo. The Malin-Warner line has a capability of approximately 500 MW.

I hope this addresses your concerns. If you have further questions or concerns please feel free to contact me.

Sincerely,

Daniel E. Bloyer
Account Executive

2 (exhibit)

LORI BURKE
FWS LIMIT
COMMENTS
SEND TO TAY 916-979-8001

Page A 19
A.6.2.3.

This section says Sierra needs more because Sierra says it needs more. There is no demonstration of the difference between what Sierra has in terms of flexibility, related to how it serves loads now. Any transmission system has limits and a lack of transmission capacity does not translate logically (directly) into a lack of service. You have not addressed reliability yet, and in view of your last section re; the expansion of local generation, you have laid no base for retail concerns about reliability.

This section leaves the impression that Sierra has not been able to import adequate "economy energy". The Alturas intertie in going to the very same sources already available to Sierra through the Idaho intertie. Is the lack of access to "economy energy" a function of an inadequate intertie that has no physical capacity? No new sources of power will be made available to Sierra with this intertie. (GP. 14-61)

If Sierra has limited access to more economic supplies, please explain how it could buy out its "firm" contracts on existing lines and substitute new cheaper firm sources without going to the expense of building Alturas. Possibly, you have failed to differentiate economy energy benefits to Sierra's wholesale customers as opposed to it's retail (native load) customers i.e. "spot" purchases to wholesale purchasers in terms of the flexibility it gives them vs. the constraints of reliability on the native load. Reliability to the wholesale embedded customers can be/are addressed by the interconnection these loads have to the other utility companies that service these areas, in addition to Sierra (Idaho power, Pacific Corp)

Page A-21 Please note that plan approval was not route specific.

The last paragraph shows no relation of the preferred routing to the west and the mining loads at the Eastern edge of the system except to mention the "above average growth" of the North Valleys and Tahoe. Please compare the above average growth in the North Valleys and Tahoe area in terms of the total demand on the system to the above average growth in the mining district. (GP. 14-62)

A.6.2 2

The system wide surplus in the 1995 -96 time frame in figure 3 is substantial. The additions of Pinion and the Tracy CT's are presented as if Reno/ Sparks must be able to generate all their own electricity within the Reno Area grid. The resources and interties in the entire system are fully integrated The major generation resource in the system, Valmy, was built to service the Reno area loads. Showing a resource deficit in the Reno Area (particularly when you don't mention the resource surplus that exists within the other two areas identified in figure 6+ 3) is misleading. If reliability of the source, or concerns about line loss for transmission between Valmy and the Reno area, please consider these issues in light of the reliability and the transmission line loss between the hydro sources in the Pacific Northwest and the Reno area. (GP. 14-63)

In the purpose and need section, there should be some information as to site specific project benefits to interconnection at Bordertown, Tracy, North Valley and Mira Loma. What prompted this question was Sierra 's assertion that interconnection to places other than Valley road would require very expensive modification to existing systems. (See Gary Munier's notes on the Nevada Alternative, August 1994). This assertion is in conflict with all the information available in the 1990 Electrical Master Plan, and is inconsistent with what I know about Sierra's Interties and distribution system. GP. 14-63

In 1990 the Bordertown property was purchased . Sierra's planned use was at that time inconsistent with the general land use plan(that was in the process of being formulated). For a substation., Sierra would also have to violate codes covenants and restrictions on that parcel, and would have to get a special use permit. They did not participates in the review of the General Land Use Plan. They did not make application for a special use permit. They made no attempt to reconcile the CCand R's with their planned use of the parcel . Yet, in the PEA the Bordertown substation site is referred to as an "existing substation site", and all routes were constrained by this parcel location , as is the location of the parcel that is the current preferred alternate. How did this parcel qualify as an "existing substation site," and does that justify the use of such a piece of land as a routing constraint? If so, considering the time factor between 1990 and the project study and proposal dating from 1993, why aren't the growth inducing impact of this site covered in full in the EIR/S/S? GP. 14-64

Re· Why the North Valley Road Substation was eliminated as a possible location for the location of all Alturas Project apparatus, thus eliminating the need for a Bordertown substation.

Are new residences (those built since 1990,or so) located closer to the possible area of expansion of the substation at North Valley Road than to the existing Sierra Pacific facilities at that site? How far from residences would the new substation expansion (or the proposed smaller substation expansion) be? This would not apply to residences located on the west side of the hill , as those houses are out of sight of all the industrial area on the east of the hill GP. 14-65

Re; Bordertown substation site

If it is determined that the location of the Bordertown substation is not reasonably situated to Reno's distribution needs and is tied to a desire for regional markets (in part, through interconnections at North Valley Road sub) how does this information effect the legitimacy of saying as the Draft EIR/S/S does that there is no reason to anticipate expansion from this site. The full, long -term environmental impacts must be studied and incorporated as part of this document. GP. 14-66

Reference: I intertie Alternative to Nevada Power.
Document: Draft EIR/S
Page B-63

Question/Comment: Statement one. "...only partial relief...." Where is the full need for 300 Kv of capacity as a "need" been documented in this study? Where is the relaying between what Sierra can continue to supply to its customers, both retail and wholesale, vs what Sierra might be able to sell to new customers if they had more capacity .How much exactly would have to be reserve? Is reserve a "need" the same as Native load customer expansion? Do both qualify as "need ". Would 50 actually do the trick? would 200 do the trick? does Sierra Actually need more than this project will supply if LMUD needs an allotment and REA want to buy more from Sierra? G 14-

Statement two· Sierra Pacific has been directed by the Nevada Public Service Commission to make interconnection with Nevada Power. Since Sierra already has direct access to the Pacific Northwest with its current intertie (which is not uo to capacity, as far as how much can physically be imported*) how does your conclusion about "cost effective" hold up. What costs are you analyzing to come to this conclusion? Sierra could utilize the Nevada Alternative corridor and other existing corridors between the two areas, were those included when you considered costs? Aspen should have detailed a more independent assessment to support the elimination of this alternative.

Sierra contention that it would not improve reliability to the Reno /Lake Tahoe area is without logic or foundation. An intertie connection to any 345 substation into the Central District will improve reliability, because it is so integrated. An interconnection with Nevada Power could involve an interconnection at Mira Loma substation, which is deemed as desirable as interconnection to North Valley Road. The Tahoe load is actually serviced most directly from the Mira Loma substation. GP. 14-6

* Sierra's current plan calls for increasing the import flow over the existing intertie to the Pacific Northwest not with the expansion of their facilities in the northeastern corner of the state, but just by virtue of the relaxed limit Alturas would give. From where that source is developed to relax the overall system limit appears to be somewhat immaterial, so interconnection to the Southern part of the state such as in the Nevada Power options would work as well. to allow Sierra more access to the "cheaper power" to the northwest.

Reference : Chart
Document: Draft EIR/S/S
Page A-20
Question/ Comment This chart , because it is not accompanied by the extensive supplemental information necessary to explain the impact of recent updates (such as CT2 and Pinion) or Sierra's commitment to expanding the geothermal resources in its own territory. This chart is deficient also in that it leaves the impression that the facilities providing for utility purchases on firm contracts can be (would be) just be abandoned GP. 14-69

JUN 12 '95 11:15AM LAUNDRY SYSTEMS P.5/7

when the firm contracts expire. There is no discussion of the limitations the Alturas project has that will effect how it will meet the "needed resources" per this chart.

{Please see the testimony and information of the next page. I included this in my testimony since I assumed, by its inclusion in your draft EIR/S that this represented accurate information as provided to you be Sierra. According to Sierra' response, we were both wrong.} In any case, Duane Nelsons testimony re: the need for this project in relation to existing resources which was elicited by the direct questioning of A.L.J. Richard Corcoran has even more specific information re: this issue; ~~any~~ I feel you should review that, as well, related to any addressing of "need" in your final EIR/S.

GP. 14-69

JUN 12 '95 11:15AM LAUNDRY SYSTEMS P.6/7

~~resource. Further it accommodates Sierra's need to add service to its territory and may utilizes existing corridors.~~

Q. PLEASE SUPPLY INFORMATION REGARDING YOUR ASSERTION THAT CRITICAL NEED FOR THE ENERGY FROM THIS PROJECT IN THE NEAR FUTURE HAS NOT BEEN DEMONSTRATED BY SIERRA

A (Please see Exhibit LB -65). This chart was supplied by Sierra and was used to demonstrate the need for this project. While this chart shows that there is currently be 900 MW of power existing resources, the Company directly contradicts this representation in prepared direct testimony before the CPUC regarding the proposed merger of Washington Water Power Company and Sierra. Sierra's Vice President Gerald W. Canning testified Company currently has1,016 MW of installed generating capacity. He further states the Pinion project will add an additional 100MW of resource to the system in early 7 While these additions are not shown on Exhibit 6, when included, it is obvious that additional 200+ MW in "existing resources" will leave the Company operating fully thin its "Total Capacity Requirement" without the addition of any utility purchases on turas or any of the other sever transmission projects Sierra currently has under sideration. This again is in direct contradiction to that representation on Sierra's chart t it has had low planning reserves since 1993.

GP. 14-70

~~DOES THIS CONCLUDE YOUR TESTIMONY?~~

~~YES.~~

B

This is from my testimony submitted to the CPUC on need for this line. I used the chart A-20 from your Draft EIR/S to demonstrate my point.

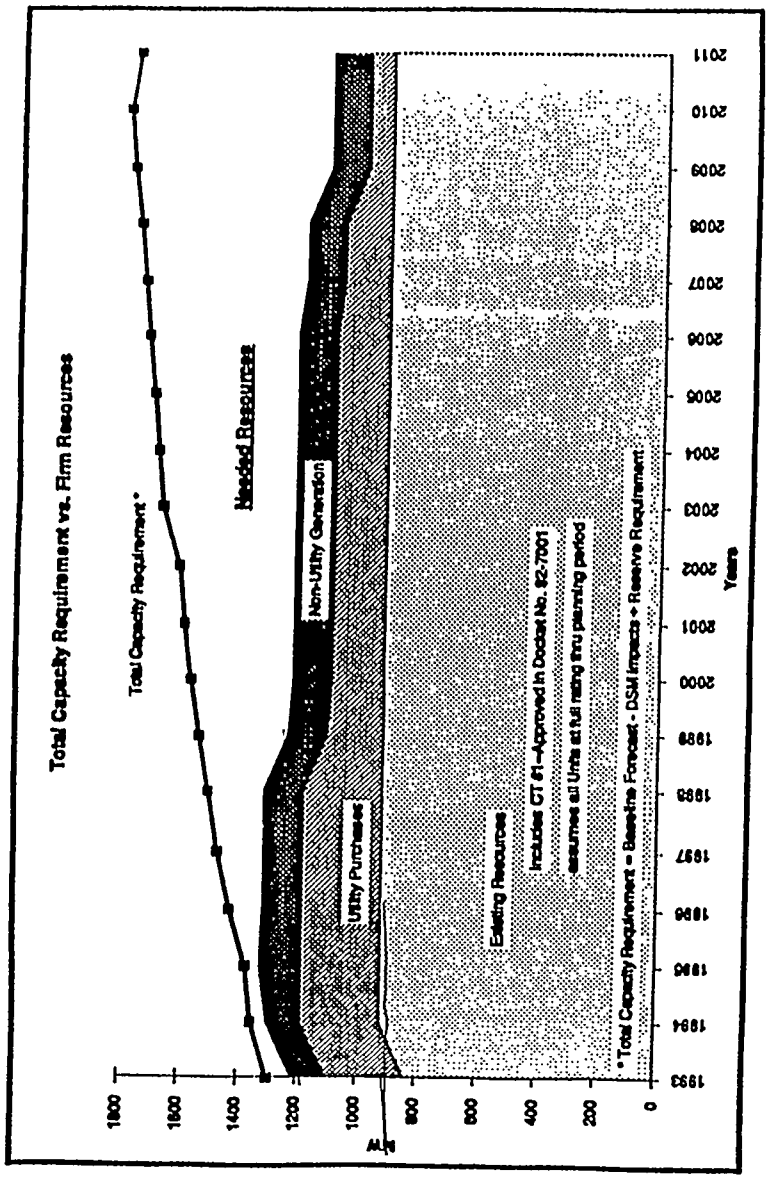


EXHIBIT G
FROM DRAFT EIR

Exhibit __ DLN

Also explained earlier, is the fact that the mining growth in the eastern part of the system is well served by Sierra's other 345 kV transmission lines and the Valmy Power Plant.

Q.25 MS. BURKE'S TESTIMONY AT PAGE 13 ASSERTS THAT THE ALTURAS INTERTIE IS NOT NEEDED AS PLANNED IN LATE 1996. SHE INCLUDES AN EXHIBIT 6 WHICH IS EXCERPTED FROM SIERRA'S 1993 ELECTRIC RESOURCE PLAN TO SUPPORT HER CLAIM.* FURTHER, SHE ALLEGES THERE IS A SCREPANCY BETWEEN GERALD CANNING'S MERGER TESTIMONY BEFORE THE CPUC, AND HER EXHIBIT 6. PLEASE EXPLAIN THE ALLEGED DISCREPANCIES.

A.25 Ms. Burke's Exhibit 6 is from Sierra's 1993 Electric Resource Plan document. It depicts a forecast of Sierra's winter capacity requirements and firm resources that either existed or had been approved at that time. It is now out of date. Subsequent to the 1993 Resource Plan, the Public Service Commission of Nevada granted approval for a second combustion turbine and the Pinon Pine Power Project. Mr. Canning's merger testimony provides current Sierra generation capacity ratings.

Other errors exist in the 1993 diagram referenced by Ms. Burke. It depicts one non-utility generation project that was not completed and another that has missed critical project milestones and is not expected to produce. The diagram is not only out of date, but it is misused as it represents Sierra's winter peaks which are more easily served than its summer peaks. Some of

GP. 14-71

This is Duane's testimony re: chart.

*Lgt cut out of

LORI BURGE

PROJECT	DATE
	/ /

COMMENTS

Addition of LMUD as a project objective

GP. 14-72

ACTIONS/TASKS

In August Sierra added the LMUD connection as a ~~proj~~ project objective. From Gary's notes + a subsequent letter from CF&D, this addition constrained further study of the Alt. Alternative.* If this LMUD connection does not stand up ~~to~~ as ~~[illegible]~~ reasonable and viable, then the scoping service should be re-scoped and opened up again to both public + agency service.

Please fully address this in your EIR/S. ~~this~~ The addition of this ~~alternative~~ component has already affected the process and should be fully investigated as to conditions of LMUD that were in effect at the time it was added as an objective.

~~LMUD Sierra initiated and was with CF&D during that LMUD had actually made application in 1984 + 1986 for a project to bring power.~~

*Per the notes of Mr. Munier + the letter from Cal Trish + Jane ~~[illegible]~~ Aspen, never reopened the scoping process to the public to add the proj. objective, even as a secondary objective, and should thus very carefully evaluate this project or alternative as part of the ~~process~~ EIR/S

GP. 14-73

In Wheeler, Harney Co and in the Wells district, there are electric transmission existing facilities either connecting or in the ~~immediate or~~ close vicinity to Sierras paths. Why does Sierra feel they will save these ~~[illegible]~~ areas the need to construct new facilities to meet their needs when their loads could be conveniently serviced by other providers? Does it make sense to incur the expense and environmental damage this ~~line~~ allows would entail just to maintain one point of source ~~in areas that could~~ to BPA customers who could maximize existing facilities ~~is~~ already in the specific load vicinity? Why is this Sierras responsibility anyway, or its rate payers.

Aspen Please address.

(3)

04-20-1995 12:56PM FROM Wade Development Company TO 6893384 P.01

WADE DEVELOPMENT COMPANY, INC.
917 Tahoe Boulevard, Suite 204A
Incline Village, NV 89451

Telephone: (702) 832-8266 Facsimile: (702) 832 0574

April 20, 1995

General Public Comment Set 15

VIA FACSIMILE (702) 689-3384

Mr. Stan Thomas
Sierra Pacific Power Company
P.O. Box 10100
Reno, NV 89520

Dear Stan,

I am writing this letter to offer our strong support for the Alturas Intertie project. As a large land developer in Northern Nevada, we welcome the Alturas Intertie as a major enhancement to the existing electrical system and the associated services provided to customers.

As we have discussed on numerous occasions, our 3,500 acre industrial park development in Fernley is projected to require a significant increase in energy demands for the various industries relocating here over the next 18 to 24 months and beyond. It is essential that we are collectively able to provide ample electricity at competitive rates in order to secure these potential users and boost the economy. Because of the size and scope of our industrial park, fulfillment of this need will greatly effect the overall economic development, jobs creation and prosperity of our great State of Nevada. GP. 15-1

Sincerely,

Patty Wade

Patricia M. Wade
President

PW:cmm

TOTAL P.01

ECONOMIC DEVELOPMENT AUTHORITY
WESTERN NEVADA
Reno • Sparks • Tahoe

General Public Comment Set 16

April 19, 1995

VIA FAX 689-3384

Mr. Stan Thomas
Director
Economic Development Department
Sierra Pacific Power Company
P.O. Box 10100
Reno, Nevada 89520-0400

RE: THE ALTURAS INTERTIE

Dear Stan:

We at the Economic Development Authority of Western Nevada are pleased to learn of Sierra Pacific Power Company's initiative to construct a transmission line from Alturas, California to Reno, Nevada.

We believe that this initiative will provide a very important product sought by an increasing number of advanced technology companies -- dependable and competitively-priced electric power. We are also pleased to see that the company will be undertaking extensive environmental studies that will minimize impacts to the environment.

It is, therefore, our pleasure to support this project which will be a very valuable development both for relocating and existing companies that are seeking to expand within the Truckee Meadows area.

GP 16-1

Sincerely,

Ken Lynn

Kenneth G. Lynn
President

KGL/nh

5190 NEIL ROAD, SUITE 111 • RENO, NEVADA 89502 • 702-829-3700 • FAX 702-829-3710

WILLIAM L. D'OLIER

Geothermal Energy Consultant
California Registered Geologist No. 1883

20 April 1995

General Public Comment Set 17

Julie Halligan/Peter Humm CPUC/BLM
% Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Re: State Clearinghouse No. 92042001
CPUC Application No. 93-11-018
BLM Case No. CACA-31406

Dear Ms. Halligan and Mr. Humm:

I would like to make several comments, as invited during the 60-day public review period for the Draft EIR/S on the Alturas Transmission Line Project. My views focus on the benefits that would accrue to Modoc County, California if the proposed 345kv line between Reno and Alturas is approved under CPUC/BLM authorities.

The most significant near term benefit to Modoc County would be the increased assurance of reliable electric power supply. No criticism is implied here on BPA and PacifiCorp performances with the existing 230 and 115kv lines into the Warner substation in Alturas. However, this past winter has proved again the vulnerability of power lines to Pacific storms in elevated terrain. The very curious forest fire along California State Highway 299 several summers ago, which seriously threatened the Round Mountain junction on the primary California-Pacific Northwest power corridor, is another example of contemporary risk to COB transmission assets. These assets are also critical to Modoc County. The proposed 345kv intertie will lift the County from its "end of the line" status to a host role for a unique triple junction for power transfers. The anticipated large power flows moving north-south on Alturas-Reno line, will afford more efficient responses to seasonal power demands. This new capacity will benefit the utility participants and the residents of Modoc County with higher quality, more reliable electric power and at possible lower cost if FERC deregulation objectives prove successful. GP. 17-1

Additionally, the 345kv intertie would present an unusual bonus in its lightwave communication (fiber optics) capacity. Considering the implications presented in the article "Lightwave Communications: The Fifth Generation" in the just published Scientific American special issue - The Computer in the 21st Century, this feature might yield societal and economic payoffs to Alturas area residents that may rival the benefits of the U.S. Highway 395 connection to Reno. GP. 17-2

My greater personal interest attaches to the future enhancement of the geothermal electric power potential of Modoc County that would come with the 345kv intertie. Your respective agencies probably are aware of two pertinent public documents; Assessment of Geothermal Resources in Modoc County, CA by Eliot Allen & Associates, Inc. 1986 as funded by the California Energy Commission and DOE/EIA-0544 issued September 1991 entitled Geothermal Energy in the Western United States and Hawaii: Resources and Projected Electricity Generation Supplies (see enclosed Table B-1 for projected megawatt capacities at Kelly Hot Springs and Suprise Valley). Aside from these encouraging published conclusions, geothermal electric power is presently unable to compete with natural gas-fired combustion turbine generating options which now dominate the market for new power capacity. Moreover, several critical issues pose at least a 5-year period of uncertainty through the year 2000. These include the impacts of electric utility deregulation, the consequences of massive utilization of a low cost, combustion capacity in the gas-fired turbine option and the CO_2 emission question. Accordingly, the electric grade geothermal potential of Modoc County may lie fallow for 5 years or so. Such delay may close the matter in most deliberations. However, these hydrothermal energy assets have very long life spans, in ranges of 10^5 to 10^6 years. The proposed new 345kv transmission capacity will advance the opportunity to produce a clean, reliable electric power supply from the geothermal resources of Modoc County. GP. 17-3

The Alturas Transmission Line Project deserves the approvals of the CPUC and BLM. I will be pleased to respond to any questions which my views may raise; my business telephone is 805-832-5786.

Sincerely,

William L. D'Olier

Enclosure

cc S. Kessler
Planning Director
Modoc County

310 Hume Lane • Bakersfield, California 93309-2427 U.S.A. • (805) 832-5786

Table B1. Projected Capacities of Hydrothermal Resource Sites in the Western United States and Hawaii
(Megawatts Electric)

State/Resource Site	Capacity				
	Base Case			Improved Technology and Accelerated Exploration Case	
	1995	2010	2030	2010	2030
Arizona					
Power Ranches	-	190	475	380	950
Total	0	190	475	380	950
California					
Brawley	-	150	300	350	640
Buckeye HS	-	250	635	500	1,270
Clear Lake	-	500	900	500	900
Coso/China Lake	250	650	650	650	1,000
East Mesa	107	360	360	360	500
Geysers	2,000	2,000	2,000	2,000	2,000
Glamis	-	275	680	275	680
Heber Geothermal	100	250	250	250	500
Kelly Hot Springs	-	300	760	1,180	3,000
Lassen	-	116	250	100	350
Long Valley (LT)	20	250	500	350	750
Long Valley (HT)	-	500	1,600	500	1,600
Medicine Lake	25	500	2,000	750	3,000
Niland (see Salton Sea)					
Randsburg	-	25	85	100	250
Routt	-	65	165	130	330
Salton Sea	185	500	1,000	500	3,000
Sespe HS	-	125	330	250	660
Surprise Valley	10	250	500	500	1,490
Wendell	-	250	650	250	650
Westmoreland	-	50	150	150	1,710
Wilbur HS	-	500	1,500	1,000	2,800
Total	2,697	7,866	15,265	10,645	27,080
Colorado					
Hot Springs Ranch	-	540	1,350	540	1,350
Paradise HS	-	25	100	50	200
Waunita	-	205	515	410	1,030
Total	0	770	1,965	1,000	2,580
Hawaii					
Kilauea SW Rift	-	50	150	100	300
Puna	3	100	500	200	1,000
Total	3	150	650	300	1,300
Idaho					
Cove Creek	-	25	100	200	300
Island Park	-	250	1,000	500	2,000
Magic Reservoir	-	360	900	720	1,800
Raft River	5	30	195	250	1,000
Total	5	665	2,195	1,670	5,100

See footnotes at end of table.

Table B1. Projected Capacities of Hydrothermal Resource Sites in the Western United States and Hawaii (Continued)
(Megawatts Electric)

State/Resource Site	Capacity				
	Base Case			Improved Technology and Accelerated Exploration Case	
	1995	2010	2030	2010	2030
New Mexico					
Rio Grande Rift	-	120	300	240	600
Valles Caldera	-	250	1,000	250	1,000
Total	0	370	1,300	490	1,600
Nevada[a]					
Beowawe	16	50	130	150	250
Desert Peak	20	100	500	250	1,000
Dixie Valley	60	250	500	250	500
Total	96	400	1,130	650	1,750
Oregon					
3 Creeks Butte	-	100	500	500	2,000
Alvord Desert	-	100	200	100	575
Klamath Falls	-	100	500	500	2,000
Newberry	-	100	1,000	250	1,500
Vale	2	425	1,062	850	2,000
Total	2	825	3,262	2,200	8,075
Utah					
Cove Fort	10	150	500	300	1,000
Roosevelt Springs	30	250	500	250	500
Total	40	400	1,000	550	1,500
Washington					
Mt. Baker	-	25	200	50	400
Total	0	25	200	50	400
Grand Total	2,843	11,661	27,442	17,935	50,335

[a]Stillwater/Soda Lake and Steamboat Springs were assumed to be similar to other sites, and were included under the other sites.
Source: Petty, S., Livesay, B.J., and Geyer, J., *Supply of Geothermal Power from Hydrothermal Sources: A Study of the Cost of Power Over Time*, prepared for the U.S. Department of Energy (Sandia National Laboratory, 1991), Tables 1 and 2.

to moderate-temperature resources to estimate the potential for power production from those lesser quality resources. This incremental low-temperature resource potential is defined as the unidentified resource base for the purposes of the Sandia study. Low-temperature resource estimates were expanded from data given in Circular 790 by converting quantities to an electric equivalent.

The Bonneville Power Administration (BPA) study of the Pacific Northwest was utilized to augment data on the resources in the Cascades. Data collected on recent drilling activity, volcanism, and the existence of high heat flow anomalies were used by BPA to identify many more resources than were cited by the USGS. Unidentified resources were estimated as the lesser of either the BPA estimates or twice the current exploration estimate. Estimated unidentified resources were assumed to be the greater of USGS estimates, developer estimates, or the consultant's judgement. Other unidentified resources were assumed to be equal to the USGS estimate, or 50 percent greater than the current exploration estimate.

Resources estimated in the preceding manner were subsequently checked against State geothermal maps prepared under the auspices of the National Oceanic and Atmospheric Administration (NOAA). Several

April 12,1995
3208 Tally Ho Drive
St. Charles, Mo. 63301

Richard Careaga
Administrative Law Judge
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102-3298

General Public Comment Set 18

Subject: Application 93-11-018. Sierra Pacific Power Co.
Alturas Transmission Line Project.

As owner of land parcel#045-131-31, Lassen County, California which is adjacent to and located on the east side of highway 395 I don't want a high voltage power line installed on or crossing over my property.

Since I purchased the property for appreciation/development and owned it for many years I believe it's present use is not the high-est and best use of the property. Consequently, with it's easy and only access to the area's business travel path (highway 395) locked off by the projected power line routing and it'scommonality with the Tuscarora gas pipeline routing the property would be rendered unfit for business/commercial/residential development.

A commonality routing as proposed by the Sierra Pacific Power Co. and the Tuscarora Gas Transmission Co. would take away approximately one-half million square feet of highway frontage land from my property for right-of-way grants. (GP. 18-1)

Schedule A (attached) from the Tuscarora Gas Pipeline Co. right-of-way grant proposal indicates approximately a 75' wide frontage dead space plus their 50' wide right-of-way , to which will be added the 140' wide right-of-way for the Sierra Pacific Power Line.

I would be denied free access to my property (landlocked). There is no other public (or other) road entry to my property. (GP. 18-2)

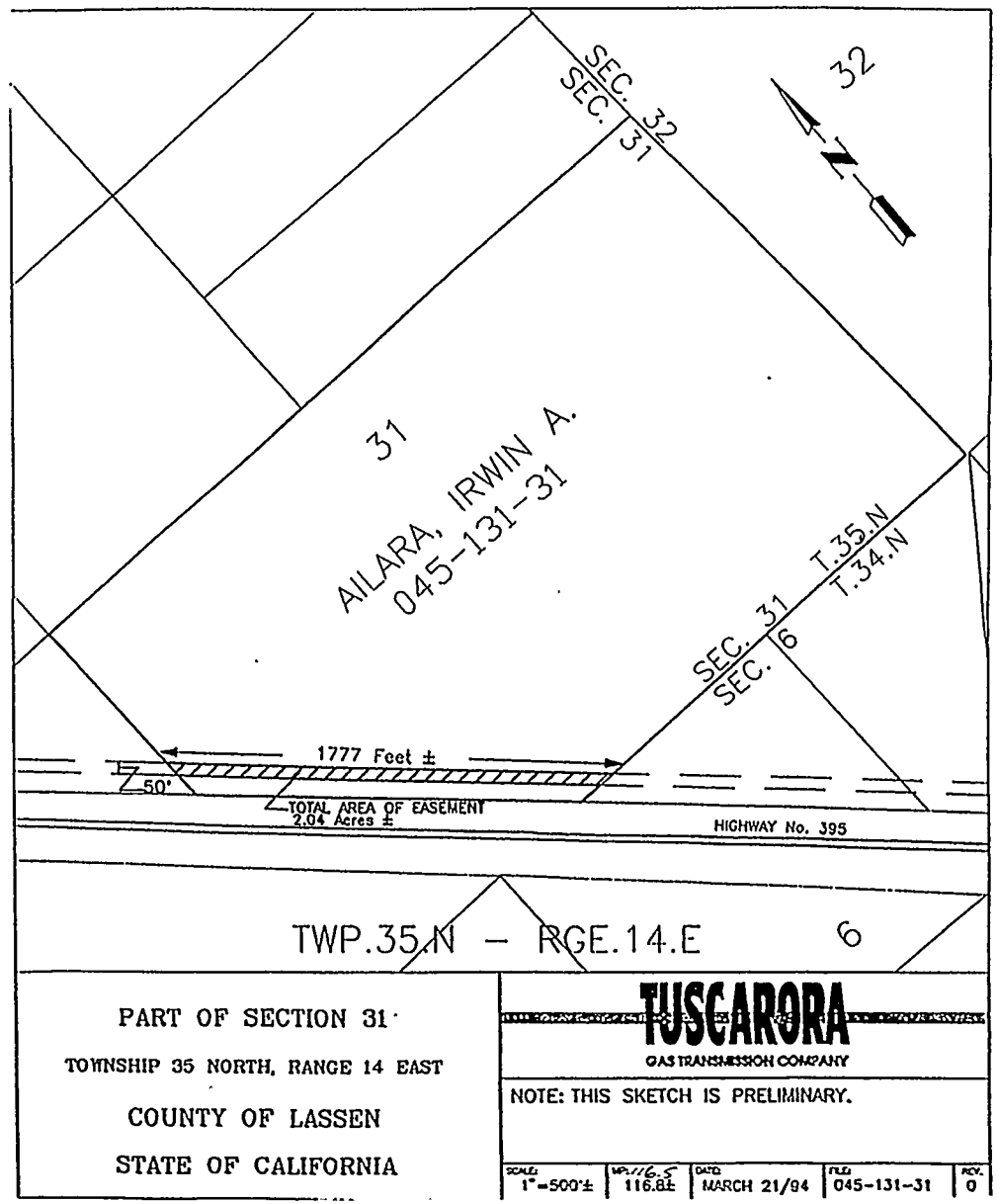
I don't want a high voltage power line or a gas pipeline installed on, over or beneath the surface of my property.

Some other constraints placed upon the property,limited land use, commercial building size/location, sight of towers and lines discourage prospective buyers/building tenants and limit traffic count for prospective businesses. (GP. 18-3)

As a concerned property owner please place me on the service list for proceedings, documents and commission decisions.

Irwin A. Ailara

SCHEDULE A



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.	Application 93-11-018

NOTE

4-12-95

NOTICE OF PUBLIC PARTICIPATION HEARING

MR. R. CAREAGA:

TO: ALL PARTIES

APPROXIMATELY 10 % OF MY PROPERTY WOULD BE DIVERTED/LOST TO THIS PROJECT & ITS RELATIVE.

I. A. Ailara

NOTICE IS HEREBY GIVEN that the Public Utilities Commission of the State of California has set the Public Participation Hearing and Evidentiary Hearing in the above-entitled matter before Administrative Law Judge Richard Careaga as follows:

Public Participation Hearing

Monday, - 6:00 p.m. April 17, 1995	Alturas City Hall 200 North Street Alturas
Tuesday - 6:00 p.m. April 18, 1995	Monticola Club 140 S. Lassen Street Susanville
Wednesday - 6:00 p.m. April 19, 1995	Loyalton High School 700 Fourth Street Loyalton
Thursday - 6:00 p.m. April 20, 1995	Airport Plaza Hotel 1981 Terminal Way - Reno, Nevada

Public Participation hearings are scheduled to provide the public an opportunity to comment on the utility's application. An Administrative Law Judge will be there to listen to your comments, and a court reporter will be recording your comments. The Commission is interested in hearing from you. Your comments can help the Commission reach an informed decision, and you are encouraged to attend one of the scheduled hearings.

RECEIVED MAY 8 1995

April 29, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca. 91301

Subject: CPUC Application # 93-11-018 and BLM Case # CACA-31406.

Dear Ms. Halligan/Mr. Humm:

The news item in today's newspaper (St. Louis Post-Dispatch, April 29,1995) compels me to reiterate my negative position on the instal-lation of the Alturas Electric Transmission Line and the Tuscarora Gas Transmission Linein a corridor through, over and under my property parallel and adjacent to the only business travel path highway 395 in the area. See South Korean gas pipeline explosion attached.

To have a 20" diameter gas pipeline with pressure relief valves venting malodorous gas fumes to the surface in close proximity to a high voltage electric transmission line is a worrisome thing. I don't want either line installed on my land. GP. 18-4

Those installations not only limit the amount of my land (Parcel 045-131-31, Lassen County) available for business facility construction, they also by their appearance discourage customer patronage to the business facilities. GP. 18-5

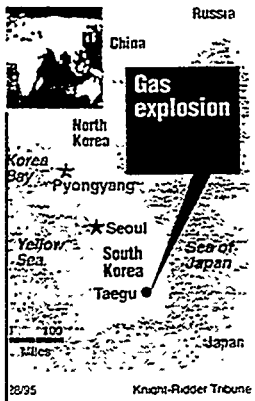
Schedule A (attached) for land (Parcel 045-131-31, Lassen County) received from the Tuscarora Gas Transmission Co. easement proposal indicates approximately a 75' wide dead space plus their 50' wide pipeline right-of-way, to which will be added the 140' wide right-of-way for the Alturas Electric Transmission Line corridor.

The total corridor absorbs approximately 10 acres of my land's business property frontage on the east side of highway 395. It also effectively landlocks many parcels of property so located on the highway. THERE IS NO OTHER ACCESS TO MY LAND EXCEPT TO AND FROM HIGHWAY 395. GP. 18-6

Moving the gas pipeline and the electric transmission line corridor a mile or so off and away from highway 395 would allow business/commercial/residential development to proceed in a normal fashion without the constraints imposed by the gas pipeline and the somber, menacing look of the high voltage transmission electric line. GP. 18-7

Respectively

Irwin A. Ailara
3208 Tally Ho Dr.
St. Charles, Mo. 63301



Korea

rom page one

Construction worker Suh Man-kyo ıd he heard a loud boom and was ırown in the air.

"When I regained consciousness. ıy co-workers were crying out for elp," he said from his hospital bed. Many were pinned under beams."

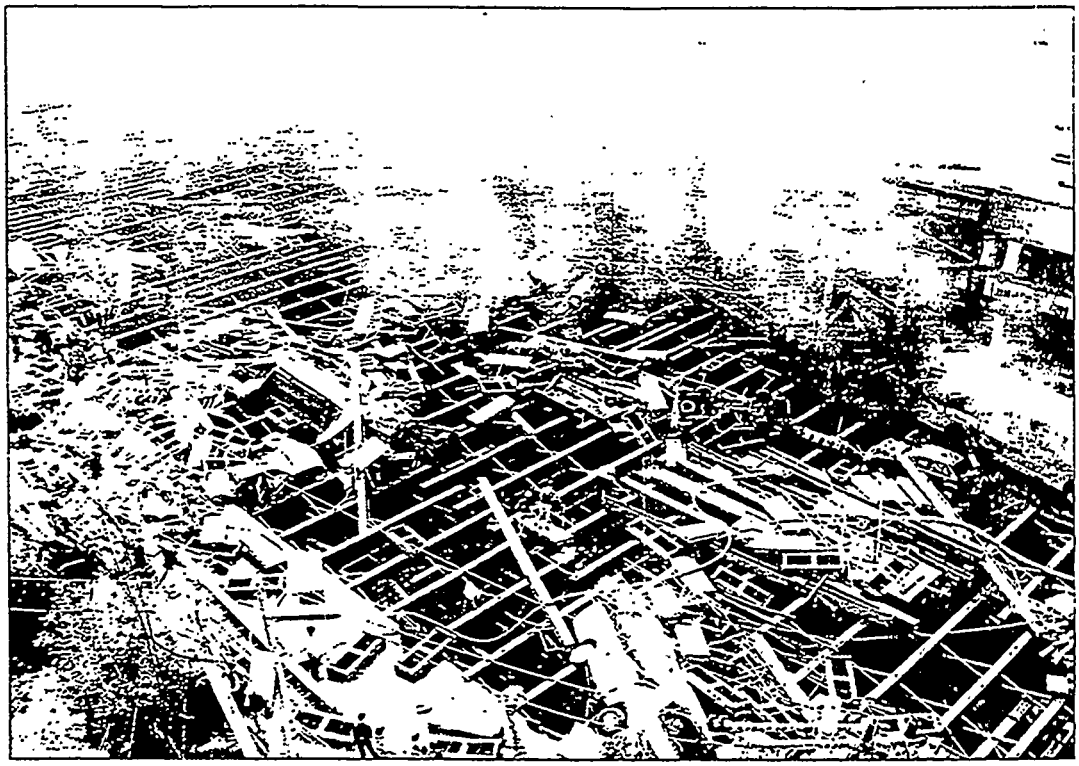
South Korean President Kim oung-sam called the explosion the esult of carelessness. Prime Minis- er Lee Hong-koo visited the site and pologized to the victims, their rela- ves, the city and the nation.

But opposition parties called the ecident evidence of government in- ompetence, pointing to a string of ecent disasters.

Last December, 12 people were- illed and dozens more injured when natural-gas holding tank exploded in a Seoul residential neighborhood. Last year, 13 smaller explosions were reported in other areas.

In October, a bridge collapsed in Seoul, killing 32 people. Three days later, a fire swept through a sightseeing ship south of Seoul, killing 30 people.

Critics say the government's gas monopoly has haphazardly added more pipes, hastily expanding the network at the expense of safety.



AP

Cars and debris litter a temporary road over a subway construction site after a natural gas explosion. The blast, which happened during the Friday morning rush hour, sent people and vehicles flying. Officials said at least 98 people were killed.

Pipeline Blast Kills 98 In South Korea

60 Students Are Among Victims

TAEGU, South Korea (AP) — Dozens of children arriving for school Friday were caught in a column of flame and thrown into the air in a gas pipeline explosion.

Their blood-soaked navy blue uniforms, schoolbags and textbooks lay scattered among the debris.

Police said a spark from a subway construction site set off natural gas leaking from a broken pipeline.

Of the 98 people killed, 60 were students, most of them ninth-graders heading to seven area middle schools during the morning rush hour, officials said. As many as 200 people were injured and others were trapped in the debris.

Many of the young victims were crossing an intersection when the blast sent up a pillar of fire 150 feet high, an injured math teacher said.

"There are torn limbs, blood everywhere," said rescue worker Choi Hong. "A lot of the people down there are kids, kids who were crushed to death."

Choi was among some 3,900 soldiers, police officers, firefighters and volunteers working to rescue survivors.

Taegu, about 140 miles south of Seoul, is a provincial capital of 2.2 million people.

The force of the blast scattered 600-pound steel slabs that were serving as a temporary roadway over the 300-yard-long subway excavation. The slabs were found strewn atop buildings and houses as far as 150 feet away.

As many as 100 cars and city buses tumbled 30 feet into the exposed excavation site. Several buildings were gutted, and a dozen more were blackened by the explosion. Witnesses reported a tower of flame up to 150 feet high.

Cranes were used to lift beams trapping survivors. Passers-by cried and hugged each other as rescue workers carried out unconscious victims.

Rescue efforts were hindered by a broken water main that officials feared could drown survivors trapped underground.

Police and gas company workers were cursed at one hospital as mothers and relatives shouted at them and tried to attack them.

"Kill me, too!" one mother shouted.

"Return my son to me!" yelled another.

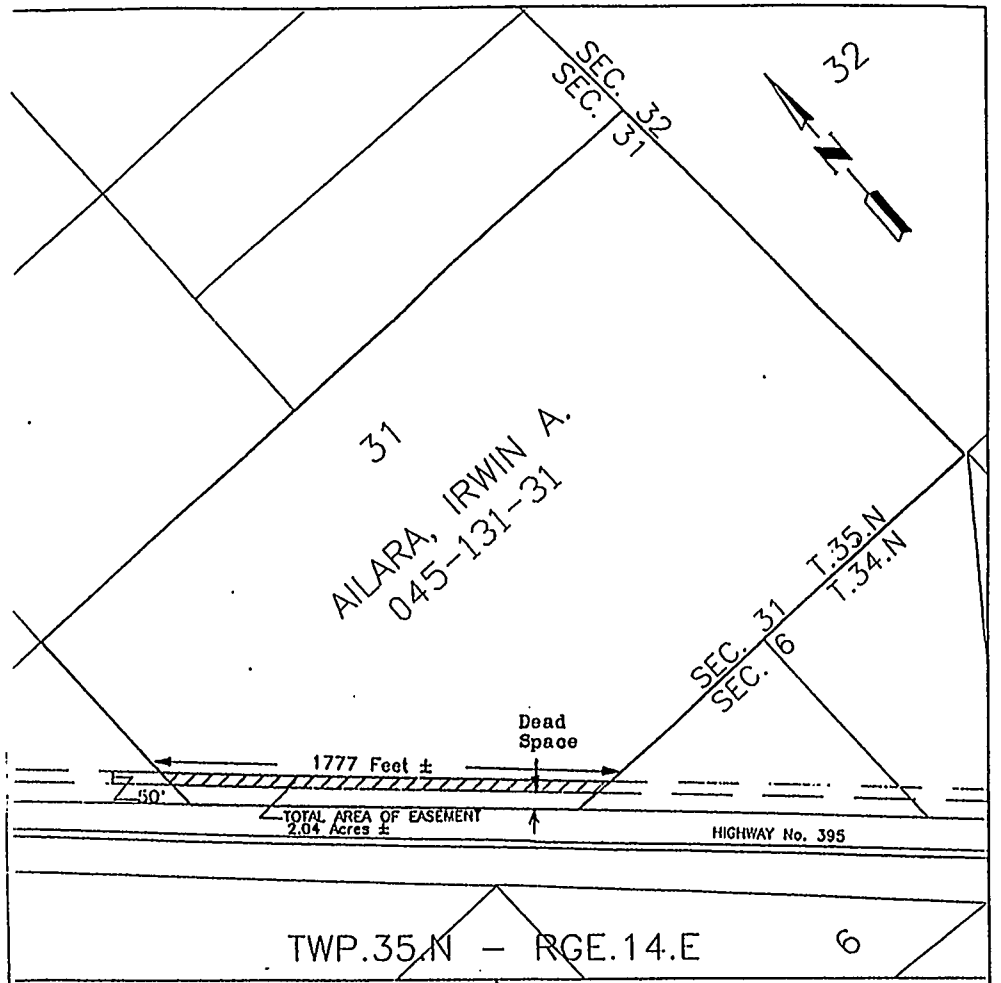
The national news agency Yonhap, reporting that excavators were being used near the gas line, suggested workers may have accidentally damaged it.

See KOREA, Page 4

AP

A woman breaks down in tears Friday after hearing that her relatives were killed in a gas explosion in Taegu, South Korea. At least 98 people were killed.

SCHEDULE A



PART OF SECTION 31

TOWNSHIP 35 NORTH, RANGE 14 EAST

COUNTY OF LASSEN

STATE OF CALIFORNIA

TUSCARORA

GAS TRANSMISSION COMPANY

NOTE: THIS SKETCH IS PRELIMINARY.

SCALE	MP	DATE	FILE	REV.
1"=500'±	116.5 116.8±	MARCH 21/94	045-131-31	0

General Public Comment Set 19

RECEIVED MAY 01 1995 4/27/95

I am writing in regard to the Altures power line matter. I live in the area known as Horizon Hills and the proposed power line is scheduled to be placed just behind our subdivision. I am against this plan for the following reasons:

GP. 19-1 1) I understand the majority of the electricity being 'shipped in' via these lines will be used by the mining community. Surely there is another route available that will be closer to these mining communities (as they are east of Reno) and smaller 120kv type lines can be run back to Reno and surrounding areas.

GP. 19-2 2) If this power corridor is established, the land there will be deemed relatively worthless for any other use. This opens the way for more power lines to be run through the corridor

GP. 19-3 3) The land as it is now is an open area — used by us and many others for hiking, biking, and horseback riding. Many children play in these hills behind our homes as well. There is wildlife and natural beauty. In view of Reno's fast growth, we must be extra cautious

(2)

GP. 19-3 before we destroy natural beauty, as this would do to this side of Mt Peavine.

GP. 19-4 4) On a personal level, I fear this proposed power line would decrease my property value, along with the property values of my neighbors. When I looked for my home, I specifically looked for certain things. One of these was not to buy near a big power line. I know other people have similar considerations when buying. Why would someone want to buy out here after these lines are up, destroying our view and posing possible health risks?

GP. 19-5 5) Continuing on my last sentence, I have listened to some of the testimony regarding possible health risks. I have heard that these studies are inconclusive. The May 3rd deadline does not give us enough time for us to research the available studies, and frankly my family's health is much too important for me to rely on someone else stating their belief is that there is no health danger. I don't see these experts from the power industry living by these corridors — and they admit they do not.

(3)

4) My last main concern at this point is the constant high wind we get here in Horizon Hills. I realize these power lines are designed for all weather conditions, but frankly I've never seen wind like it is out here. I would worry about this constant strain on the power lines, and I would worry about the fire danger should a line snap. We've had brush-fires out here before — between the high wind and dry conditions of the landscape, fire can be a serious threat to all of our homes and personal safety. GP. 19-6

In closing, I thank you for your time. Please consider our letters — there are alot of concerned families in these affected areas. Please reroute the Altures power corridor on to vacant land - perhaps farther east of Reno/Sparks. At the very least, please extend the May 3rd deadline. The power industry has known of this project for at least 2 years — we've only been notified within the last 2 weeks. That alone makes me question this whole issue. If there are no risks involved — either health or financial — why the secrecy?

→

I will watch this closely —

Sincerely

Susan M. Gross

Peter A. Cutanovic
Susan Gross
8160 Mohawk Ln
Reno NV 89506
(702) 972-7843

Draft EIR/S Comment Sheet RECEIVED APR 26 1995

Proposed Alturas Transmission Line

General Public Comment Set 20

Name: D. E. Stahl
Affiliation: 720 East 4th St.
Address: 720 East 4th St.
City: Alturas State: CA ZIP: 96101
Phone: (916) 233-4890 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

The impact of the proposed Sierra Pacific power line on many animals, e.g.; raccoon, beaver, badger, Horned Lizard, Rubber Boa, rattlesnake, watersnake, wood rat, weasel, trout, bass, Hermit Thrush (on Likely Mountain), robin, magpie, and raven, was not considered in the DEIR/EIS. Although none of these animals are on the T&E list, many of them are fully protected by law, and others are controlled with seasons of take and bag limits. (GP. 20-1)

Respectfully
D E Stahl

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet RECEIVED APR 26 1995

Proposed Alturas Transmission Line

Name: D. E. Stahl
Affiliation: NOPE
Address: 720 East 4th St.
City: Alturas State: CA ZIP: 96101
Phone: (916) 233-4890 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

The impact of EMF on hatching success of ground nesting birds such as Sandhill Cranes, Sage Grouse and others is not addressed and is apparently unknown. If EMF can cause Leukemia in children, it may also prevent eggs from hatching or cause deformities in the hatchlings. (GP. 20-2)

Respectfully
D E Stahl

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet RECEIVED APR 26 1995 RECEIVED APR 26 1995

Proposed Alturas Transmission Line

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Sandhill Cranes are an endangered species and declining in numbers; therefore, it is extremely important that no more are lost. The DEIR/EIS provides for certain safeguards and additional habitat acquisition as mitigation. But there is no way to assure that any cranes will use a new area; in fact, it is very doubtful. Furthermore, marking lines to make them more visible to birds has shown only an average 45% reduction in mortalities. Besides Pit River, cranes are regularly observed on the Madeline Plains. GP. 20-3

Respectfully
D E Stahl

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet RECEIVED APR 27 1995

Proposed Alturas Transmission Line

Name: D. E Stahl
Affiliation: NOPE
Address: 720 East 4th ST.
City: Alturas State: CA ZIP: 96101
Phone: (916) 233-4890 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

One of the greatest impacts of the proposed power line route is the visual impact. One of the greatest assets the Alturas area has to offer is our wide open spaces and great views. The preferred routing would totally destroy the beautiful view looking west to Mount Shasta from Alturas and coming in to Alturas from the west it would destroy the fine view of the beautiful Warner Mountains. The recreational value of the area to the south would be greatly reduced because the preferred route is all in a prime hunting area and goes near many popular fishing waters. GP. 20-4

The Nevada route would have an impact on a lot fewer people. It would have far less visual impact and far less impact on wildlife. Although the Nevada route is supported by the U. S. Forest Service, Calif. Dept. of Fish and Game, Audubon Society, Sierra Club, and many others, this route has not been seriously or properly considered by Sierra Pacific. GP. 20-5

Respectfully
D E Stahl

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

..it Sheet RECEIVED APR 2 8 1995

Proposed Alturas Transmission Line

..: D. E. Stahl
Affiliation: NOPE
Address: 720 East 4th St.
City: Alturas State: CA ZIP: 96101
Phone: (916) 233-4890 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

The DEIR/EIS on the Sierra Pacific Power Co. Alturas Transmission Line project did not give proper consideration to the visual impact the proposed power line would have on fishermen, hunters, and other recreationists using Viceroy Pond, Delta Lake, Bayley Reservoir, Graven Reservoir, Juniper Stock Tank, Nelson Corral Reservoir, Smith Reservoir, and Bailey Reservoir (at Madeline) and the surrounding areas.

These waters are not only heavily used by local anglers and waterfowl hunters, but by large numbers of people from throughout the State. The surrounding areas are also widely used by deer hunters and other recreationists. Although a photosimulation was made near Bayley Reservoir, and Delta Lake was mentioned in connection with aquatic habitat, there is no indication that the study was aware of the existence of the other waters let alone their great recreational value.

GP. 20-6

Respectfully
D E Stahl

.. deposit this sheet at the sign-in table before you leave today, or fold, seal and 5. Insert additional sheets if needed.

Draft EIR/S Comment Sheet RECEIVED MAY 0 1 1995

Proposed Alturas Transmission Line

Name: D. E. Stahl
Affiliation: NOPE
Address: 720 East 4th St.
City: Alturas State: CA ZIP: 96101
Phone: (916) 233-4890 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

The DEIR/EIS states there would be 12 miles of new access roads and 32 miles of upgraded roads. This is unacceptable. Once these roads are in place there is no way they can be effectively closed. People with four wheel drive vehicles and small three and four wheelers will get around any barrier that is constructed. The area along the proposed line can not withstand any additional pressure on its wildlife. Further, although there would be safeguards against introducing noxious weeds during the construction phase, there can be no safeguards against recreationists importing noxious weeds on their vehicles, clothing, or pets.

GP. 20-7

Respectfully
D E Stahl

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

RECEIVED MAY 0 1 1995

Proposed Alturas Transmission Line

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Address: 720 East 4th St.
City: Alturas State: CA ZIP: 96101
Phone: (916) 233-4890 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

The maps of the proposed route are entirely inadequate. Roads are not identified and some prominent features are not shown. Just one of these is Viceroy Pond. Another example is on map 4 of 33 where the road to Bayley Reservoir is shown dead ending near the north end of segment C, when in fact the road continues to Bayley Reservoir and on to Delta Lake.

GP. 20-8

The many omissions and the vagueness of the maps did not give people a chance to see just where the proposed line would actually go and therefore denied them the opportunity to make objections they might otherwise have made.

Respectfully
D E Stahl

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED APR 27 1995

OHLSON & SPRINGGATE
ATTORNEYS AT LAW
ONE EAST FIRST STREET, SUITE 1100
RENO, NEVADA 89501

JOHN OHLSON
JOHN P. SPRINGGATE

TELEPHONE (702) 323-0300
TELECOPIER (702) 323-3869

April 24, 1995

General Public Comment Set 21

Julie Halligan
Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

Re: Alturas Transmission Line Project EIR/S
CPUC Application No. 93-11-018
BLM Case No. CACA-31406

Dear Ms. Halligan and Mr. Humm:

Please consider the following as written comments on the draft Environmental Impact Report/Statement on the Alturas Transmission Line project referenced above. I am opposed to the project as currently constituted. These reasons are as follows:

1) The Summary of the proposed project impacts by issue area and classification show a significant number of class I impacts, particularly in land use and recreation, and visual resources. I am a homeowner adjacent to Rancho San Rafael Park in Reno, near the southern terminus of the project. Allowing the project to proceed as currently proposed by Sierra Pacific Power Co. would be a significant visual impact upon the area. I noted in review that several of the alternatives discussed the visual impact caused by expanding the North Valley substation as an alternative to the Bordertown substation, which declined to consider the fact that North Valley substation is an existing visual blight. Expanding it would constitute a far lower impact than impairing the existing view of Rancho San Rafael Park. GP. 21-1

2) I am additionally opposed to the existing Bordertown substation site. Long Valley is an historically and culturally significant site, and no alternatives to that substation have been addressed which would remove it from the Bordertown area. While the alternative is preferable to the proposed site, alternatives have not been significantly studied that would remove it entirely from Long Valley, which has a history of human habitation from the early 1860's. GP. 21-2

3) Additionally, the draft EIR does not adequately discuss the viability of the Nevada route alternative. I would note that on page C.14-2, the transmission alternatives for both the Nevada route alternative and the Summer Lake-Valley Road alternative both meet all of the necessary primary and secondary plan objectives. Sierra Pacific Power Co. has not significantly studied any of the alternatives. As they note (page C.14-6), they have conducted only preliminary technical feasibility analyses and cost estimates for the alternatives included in the table. As they further note, it would take longer to examine and do feasibility analyses for those, and thus they reject those alternatives. This is in effect a self-fulfilling prophecy, meaning that Sierra Pacific, by virtue of only studying one alternative, limits itself by virtue of design requirements to effectively eliminating alternatives which it does not favor. This is a misuse of the EIR process, and they should be directed to return and conduct feasibility studies on the alternatives. GP. 21-3

Certainly from an aesthetic point of view, it would be preferable to use existing transmission corridors as opposed to constructing an entirely new high voltage corridor.

3) Significantly, two areas appear to have been missing from the EIR: First, there has been no discussion of EMF hazards or concerns, particularly where the transmission line passes through highly inhabited areas, including Bordertown and the Valley Road area. If any consideration is given to EMF factors, it would seem that the Nevada alternative would be preferable, as it is located far away from any significant habitation. GP. 21-4

Secondly, it is been consistently noted throughout the analysis that this will provide a benefit to the Lake Tahoe area in increased reliability, and at the public comments, an official of the Truckee-Donner utility district spoke in favor of the proposed plan. However, missing from any of this is any discussion of the eventual connection between Truckee-Donner and existing Sierra Pacific facilities, and absent a scoping procedure that would include those connections, Sierra Pacific is avoiding the issue of any significant detriments that would be caused by the eventual connections with Truckee-Donner Municipal Utility District. GP. 21-5

Thank you very much for the opportunity to comment on the draft EIR/S, and I reiterate my comments that the project as proposed should be denied, or returned for further scoping.

Very truly yours,

JOHN P. SPRINGGATE

RECEIVED ... 25 1995

General Public Comment Set 22

George Herman
2445 Mandan Way
Reno, NV 89506

April 25, 1995

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Ms. Halligan and Mr. Humm,

I was one of those who spoke briefly at the recent hearing of the California Public Utilities Commission in Reno on April 20, 1995.

My purpose in writing now is to add to the public record on behalf of those opposed to the proposed Alturas Transmission Line Project of our franchised utility company, Sierra Pacific Power Company.

GP 22-1

It seems clear that neither Sierra Pacific nor the Nevada Public Service Commission has met its obligation to inform the public about the proposed installation. Their response to the public's interests reflects a calculation of corporate ambition as against the relative impotence of small groups of people who will be intimately affected by the placement and functioning of the power line. Were those whose obligation it is to protect the interests of people in California or Nevada to walk the proposed transmission line, they would discover the serious visual impact of such an installation. We who live in the neighborhood of that line will long suffer the consequences of the decision to run the line in the vicinity of people's homes and of public land. These consequences may well include damage to our health.

The vocal opposition at the hearing the other night was eloquent expression of the dismay of plain citizens of our community who feel betrayed by those whom we expect to serve and protect us.

Sincerely,

George Herman

RECEIVED ... RECEIVED ...

George Herman
2445 Mandan Way
Reno, NV 89506

April 26, 1995

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Ms. Halligan and Mr. Humm,

Re CPUC Application Number 93-11-018
BLM Case Number CACA-31406

In my previous letter I did not include the CPUC Application Number and the BLM Case Number, therefore I am repeating my letter in order to meet the requirements of written comment letters.

I was one of those who spoke briefly at the recent hearing of the California Public Utilities Commission in Reno on April 20, 1995.

My purpose in writing now is to add to the public record on behalf of those opposed to the proposed Alturas Transmission Line Project of our franchised utility company, Sierra Pacific Power Company.

It seems clear that neither Sierra Pacific nor the Nevada Public Service Commission has met its obligation to inform the public about the proposed installation. Their response to the public's interests reflects a calculation of corporate ambition as against the relative impotence of small groups of people who will be intimately affected by the placement and functioning of the power line.

Were those whose obligation it is to protect the interests of people in California or Nevada to walk the proposed transmission line, they would discover the serious visual impact of such an installation. We who live in the neighborhood of that line will long suffer the consequences of the decision to run the line in the vicinity of people's homes and of public land. These consequences may well include damage to our health.

The vocal opposition at the hearing the other night was eloquent expression of the dismay of plain citizens of our community who feel betrayed by those whom we expect to serve and protect us.

Sincerely,

George Herman

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California Public Utilities Commission and Bureau of Land Management
Ms. Julie Halligan\Peter Humm
c\o Aspen Environmental Group
34023 Canwood Street, Suite 218
Agoura Hills, CA 91301

General Public Comment Set 23

April 26, 1995

Thomas G. Parnow
PO Box 1167
Alturas, CA 96101
(916) 233-5474

RE Proposed Alturas Transmission Line
CPUC Application No.: 93-11-018
BLM Case No.:CACA-31406

Dear Aspen Environmental Group, CPUC, and BLM,

After attending the most recent Administrative Hearing in Alturas on April 17, 1995 and reading the E.I.R. I have several issues directly related to the report I feel are relevant to the construction of the proposed Sierra Pacific Power Company Alturas Transmission Line Project.

1 My first concern is BLM's conflict of interest in this project. The U.S. Government owns approximately 90 percent of the land between the sub-station in Devils garden and the termination point in Reno. Most of the Government land is controlled by BLM and the remainder by the U.S Forest Service. Considering the fact that *any* intrusion on *any* property has some negative environmental impact, how can the largest land holder remain objective

Solution #1: BLM be removed from the project, to the point where they have no more control or input than the private property land owners involved If the Federal Government mandates a representative on the Board, CPUC should select an agency with similar interests as the CPUC such as the Federal Communications Commission.

BLM's financial, legal and environmental assets be made available to possibly effected landowners so they can equally evaluate the impact of the transmission line on their property.

Solution #2: Aspen Environmental to make an objective independent evaluation of BLM's role, input, and resources into the proposed route of the transmission line. How the Nevada route "may" be another possible alternative, but what could Sierra Pacific Power Company expect in a legal battle from BLM as opposed the Alturas route and the possible legal battle from private land owners.

Solution #3: Per Aspen Environmental's own recommendation in their EIR proposal, a citizens "*Advisory Committee*" (Page D-13) should be comprised of "*interested*" private property land owners from each involved county, added to the evaluation board, and then give them access to BLM experts to assist in the evaluation of the transmission line on private property as oppose to public property.

GP. 23-1

2. Project Alternatives: The E.I.R. should look at other possible alternatives that may suggest more desirable routes with less impact on the land, people, and with a correlation of costs. It is impossible to determine if *any proposed* power line route is acceptable until one looks at other alternatives and does a comparison. An example, In case of a severe infection of an appendage, amputation may save the life, but if feasible, antibiotics could be a better solution

The recommendation made by the CPUC on their letter of 4\10\94 (RFP PS-1421) Article I, "General Information for Contractor". Under I.1, second paragraph, it states, "One of the CPUC's *primary obligations* in issuing a CPCN for a project of this type is to ensure the evaluation of *all reasonable alternatives*." Alternatives should be suggested in the EIR.

GP. 23-2

3. Fire Danger: The Nevada route would offer a reduced fire danger should the construction of the power line or should an accident occur where the power line ignites a fire. Their is much reduced vegetation, less cultivated farmland, less populated areas. The only negative is fire response is time would be lengthened.

GP. 23-3

4. Traffic Flow: The Nevada route has a significantly smaller potential to impact traffic flows during construction or should a power line fall, as oppose to the Alturas route

GP. 23-4

5. Financial Impacts: The E I R fails to address the extremely fragile economy of Modoc County and how the addition of a significantly huge, ugly, long electrical transmission line will effect property values. This will impact potential new people who may desire to relocate here, there by reducing future population growth in our most densely populated corridor, reduce values of existing land hurting the land owner and hurting the County's tax base as property values will almost certainly spiral downwards as this power line comes within visible range of property within a two mile corridor of the power line. Also not addressed is the fact that the proposed route crosses an extremely large percentage of private land, there by hurting property values by even a greater percentage considering the fact that the federal government owns 90% of the land in the region

GP. 23-5

6. Visual Impacts: The proposed route is through the middle of the most beautiful, most populated and most traveled route in Modoc County. The EIR noted that the visual impact would not be significant due to the few number of viewers. Few in relation to what? In relation to California's population, then correct. But in relation to Modoc County residents, WRONG! Over 60 percent of the county resident will view the proposed power line on a daily basis. I feel most people would consider that *Very Significant*. Hundreds of thousands of motorists travel through Modoc annually on their vacations. Why do we want to spoil the prettiest part of our county with a "Industrial View", instead of a view of the high desert or Warner Mountains? Doesn't their view count or are they *insignificant* too?

Because our population hasn't yet grown, we don't have a large political voice, and perhaps with the ugly power line running across the most centrally located, beautiful private land in Modoc County, people will never move here and we will continue to be a dumping ground for the rest of the state. Think of this as your home, do you think it's fair that we get this power line that will for next to eternity, blight our landscape? We have little to offer new business and residents other than our clean air, water and our views of nature. Help us preserve it

GP. 23-6

7 Future Impacts: How will construction of this transmission line impact the future growth of the Reno area and what environmental impacts will this growth cause in the future due to the increased population, such as loss of desert habitat due to home and commercial construction, reduced ground water supplies, reduced wetlands due to decreased ground water supplies, reduced migratory bird habitat, etc. Los Angeles destroyed Mono Lake, due to their uncontrolled growth, now Reno s growing and hungry for power and water. Ask yourself, is it fair that Modoc become the next Mono Lake. Let's be honest during the construction of the E.I.R. GP. 23-7

Thank you for taking the time to read this letter. I am looking forward to hearing your specific responses.

Sincerely,

Thomas G Parnow

Thomas G Parnow

JUN 05 1995

May 30, 1995

Ms. Julie Halligan/Mr. Peter Hurm
Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 96101

RE: Alturas Intertie, CPUC #93-11-018
BLM #CACA 31406

Dear Ms. Halligan and Mr.Hurm,

After reviewing the Draft Environmental Impact Report (DEIR) prepared by Aspen Environmental Group, I found that it was filled with errors. Occassional small errors are really not worth the time it takes the public to correct them. Frequent small errors,however, are probably indicative of larger errors being present that the public does not have enough knowledge to address.

One error that I would like to point out occurs on page c.8-51 of the DEIR. It states that Segment B impacts the golf course owned by the county. The county does not own the golf course, the city of Alturas does. It is also implied on this same page that the driving range is part of the city owned golf course. It is not. The "driving range" is a thirty-five acre parcel owned by a private individual. There is no lease or rental involved. The owner just simply allows people to drive balls onto his property. The interference of playing golf would not occur as the line itself would not cross the golf course. GP. 23-8

Page c.9-6 states that seasonal industrial noise sources are sawmills. There are no sawmills in the area. GP. 23-9

On page C.11-9 of the DEIR, it states that the Alturas Rural Fire Department would have a response time to the proposed substation of no more than three minutes. Assuming that the substation is the proposed substation on Devils Garden (nothing indicates otherwise), this is not only wrong, but impossible. The substation is located five miles from the fire station, and on top of a steep grade (Barnes Grade). Doesn't it seem odd that you give a response time of ten to fifteen minutes to the Modoc County Sheriff's Department to the line and less than three minutes for a water laden fire truck? GP. 23-10

Thank you,

T.G. Parnow
PO Box 1167
Alturas, CA 96101

RECEIVED
MAY 04 1995

April 25,1995

EAGLE LAKE OFFICE
RECEIVED
APR 28 1995
BUREAU OF LAND MANAGEMENT

General Public Comment Set 24

John R. Tvrdevich
P.O. Box 552
Alturas, Calif.
96101

Pete Humm
Bureau of Land Management
Susanville District Office
Susanville, Calif.
96130

Pete,

I would like to thank you for your the lead role you are taking in the Sierra Pacific Line Project. I can well imagine how difficult your task must be. As a Captain in the Alturas Rural Fire Department, I am concerned for the safety of our firefighters, during a future response to a wildlands fire in the vicinity of the Sierra Pacific Line. Please refer to Part C.10.1.4.3.

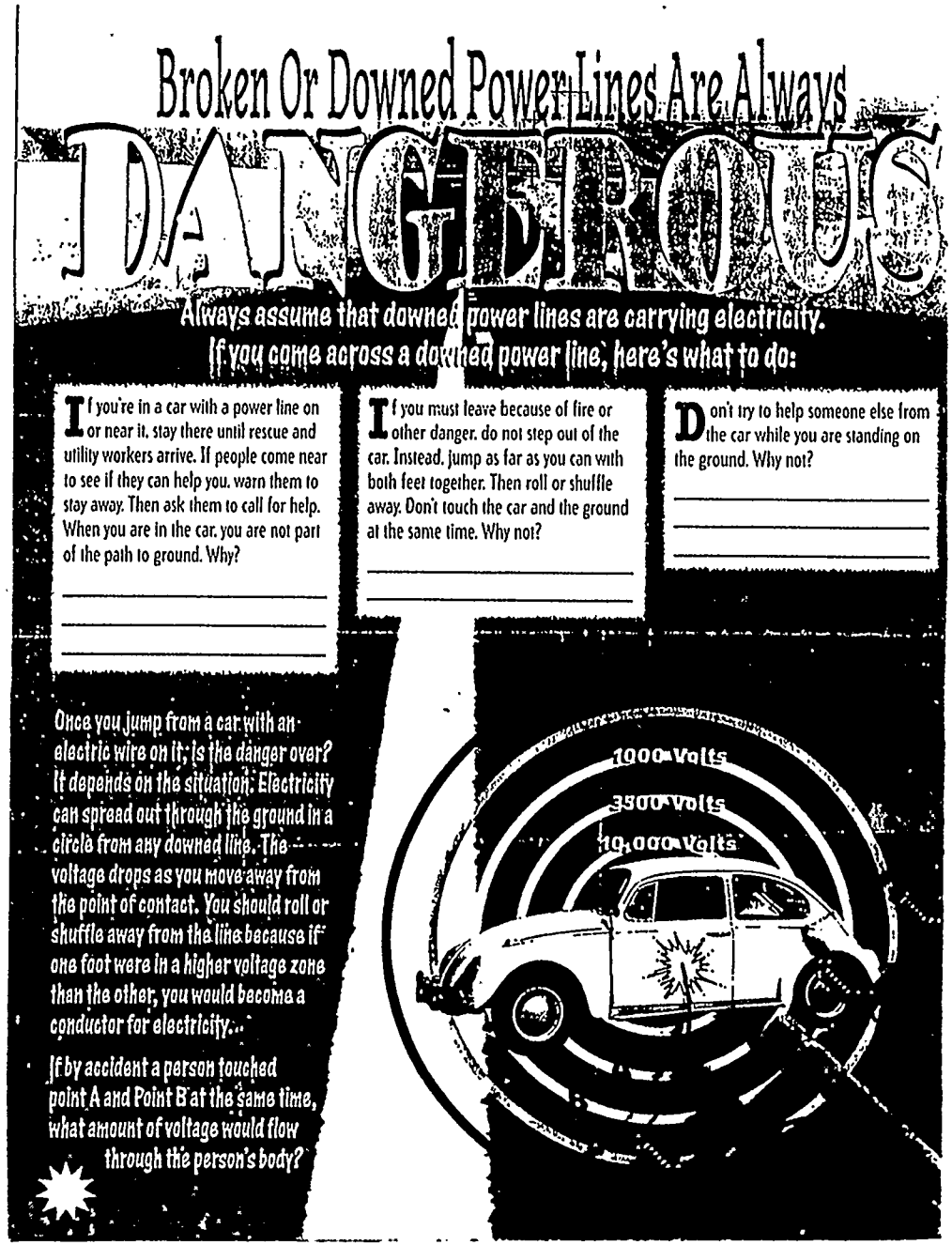
Over the years, Surprise Valley Electric & Pacific Power & Light have provided electrical safety training to our local fire departments. One point that was driven home over & over was the fact that when a high voltage line drops to the ground, the earth is electrified for a distance which increases with voltage. Aspen Environmental states that the line is supposed to shut down in less than a second. They did not address this safety issue satisfactorily. What if the line is energized from the Reno area? They did not mention the fact that earth will be energized around the vicinity of the downed line & how far out will this happen?

I would like to have this question of ground electrification answered satisfactorily, as the lives of many firefighters are at stake. Thank you for your help.

GP 24-1

Very Respectfully

John R. Tvrdevich



RECEIVED APR 27 1995

April 25,1995

John R. Tvrdevich
P.O. Box 552
Alturas, Calif.
96101

Julie Halligan
California Public Utilities
Commission
505 Van Ness Avenue
San Francisco, Calif.
94102

Julie,

I would like to thank you for your prompt response on my request for the Sierra Pacific EIR/EIS. As a Captain in the Alturas Rural Fire Department, I am concerned for the safety of our firefighters, during a future response to a wildlands fire in the vicinity of the Sierra Pacific Line. Please refer to Part C.10.1.4.3.

Over the years, Surprise Valley Electric & Pacific Power & Light have provided electrical safety training to our local fire departments. One point that was driven home over & over was the fact that when a high voltage line drops to the ground, the earth is electrified for a distance which increases with voltage. Aspen Environmental states that the line is supposed to shut down in less than a second. They did not address this safety issue satisfactorily. What if the line is energized from the Reno area? They did not mention the fact that earth will be energized around the vicinity of the downed line & how far out will this happen?

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Very Respectfully

John R Tvrdevich

John R. Tvrdevich

RECEIVED MAY 0 1 1995

1

April 27, 1995

RE: **CPUC Application Number 93-11-018**
BLM Case Number CACA-31406

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

General Public Comment Set 25

TO ALL INTERESTED PARTIES:

As interested landowners in Segment X of the proposed Alturas Transmission Line Route (ATLR), let us congratulate Aspen Environmental Group for the comprehensive and lucid EIR/S presentation and Sierra Pacific Power for its compliance with environmental impact laws and concern for the environmental impact that such a project will cause.

However, as homeowners who will live within 3,000 feet of the 345,000 volt electric power transmission line, if it is approved, we deplore the lack of notification of this proposal.

We see by your EIR/S Task Flow chart that we could have been made aware of this proposal as early as May 1994. We first became aware of it on Monday, April 17, 1995, through an article in the Reno Gazette-Journal, and have subsequently learned that the public has only until May 3rd to ensure consideration of comments or objections in the Final EIR/S. On April 20, we attended and participated in a public hearing at the Airport Plaza Hotel in Reno. At that meeting, we heard comments and complaints from many of our neighbors and affected parties that they were also unaware of this proposal. A deadline of May 3rd does not allow for the public to organize any group objection to the proposed ATLP. We are faintly suspicious that the "quietness" about the project was designed to prevent any objection to it. We do feel that if more people had been notified and there had been more "news" about this proposal you would be receiving much more resistance than you probably have. GP. 25-1

Let us first list the objections and concerns that directly affect our interests. Most of these objections and concerns are listed as impacts in your study: GP. 25-2

2

1. Temporary pollutant emissions for construction equipment and fugitive dust during construction.
2. Surface removal, surface disturbance, increased access, erosion and sedimentation, and introduction of non-native plant species during construction and continued operation of the transmission line facility.
3. New permanent overland access routes.
4. Corona Discharge. During wet weather the noise produced by corona discharge is non-significant, but is the corona discharge significant?
5. Electro-Magnetic Field complications. Even though long term effects of EMFs have not been conclusively determined, there is a *possibility* of a health hazard for residents living near transmission lines of such great voltage.
6. Other negative impacts by the EMFs associated with the ATLP (Draft EIR/S March 1995, ES-36): are "audible noise, radio and television interference, ozone production, cardiac and pacemaker interference, induced currents and voltages in conductive objects, fuel ignition, shock hazards, and hazardous materials." GP. 25-2
7. Interference with the view. Since Peavine Peak is "our back yard," any transmission project between our residence and the mountain is a marked degradation of the view that we love. One of the reasons we purchased our home and have spent thousands of dollars to improve it, is that view. The proposed ATLP could greatly affect the quality of our life and the value of our property.
8. Fire danger. The ATLP could increase the potential for wildland fires, either during construction or through transmission of electricity (longterm). If this is an increased hazard, this further endangers our health and property and would increase fire insurance rates (insurance is difficult to get now because of our location; the transmission line could make it impossible to obtain).
9. High winds may affect lines and towers. We live in an extremely high wind area.

All of these factors would significantly diminish our quality of life and pose possible hazards to our well-being.

Now we would like to state objections and concerns that do not *directly* affect us, but will affect others. GP. 25-3

1. One of the stated reasons for the project is to increase capacity for anticipated growth. What resident currently living in this region wants this area to grow any larger? My husband has

3

lived here off and on for 35 years. I have been here for 20. We do not see that future growth will benefit this entire area. Already, the quality of life because of growth has been severely damaged. Our natural resources are strained. Our roads are congested and in disrepair. Our schools are overcrowded. Our taxes continue to increase. Our air quality has greatly diminished. Our socio-economic problems have intensified with the increased disparity between the rich and poor. We have youth gangs, graffiti problems, increases in crime, a decrease in the feeling of personal safety with a subsequent loss of "neighborliness," loss of wildlife habitat, loss of the "meadows," loss of scenic beauty (look at all the power lines and towers studding the hills near TMCC down to the Valley Road Substation). People are pouring into this region, but someday they are going to pour out for the same reason (GROWTH) that they left their former locations.

Providing facility for future growth does not seem to be a good reason for the ATLP or for the citizens of this region.

2. The recent acquisition of approximately 8,000 acres of private land on Peavine Mountain by the US Forest Service for the purpose of "saving" this land as a scenic and environmental resource for the people of this region does not seem to be consistent with the ATLP. Where are the Friends of Peavine, a group instrumental in this acquisition? One of them showed up and said he was also a shareholder in SPPCo, and hoped that the ATLP would not impact the mountain too greatly. A "done deal" for that shareholder!

3. Residents of Long Valley, Bordertown, Anderson Acres, Horizon Hills, and those living near Talus and North Virginia, and Rancho San Rafael would be impacted as we outlined in earlier objections, Nos. 1-9. There are probably more areas that we have not named.

4. The City of Reno and Washoe County should be concerned because of the direct negative impact the ATLP will have on Rancho San Rafael. The transmission line and towers will cut directly through the park once the Forest Service land is given over to the park. This could negatively affect use of the park and might eliminate the "Reno Balloon Races," a great and popular community event.

5. The Draft EIR/S March 1995, C.13-43 stated that the ATLP is inconsistent with the Washoe County Comprehensive Plan Land Use and Transportation Element, Land Use Policy LUT.1.11 and Implementation LUT.1.14.1b, as well as the North Valleys Area Plan Conservation Policy NV.1.1, and Cultural and Scenic Resources Policy NV.1.2 The ATLP "(1) would negatively impact the visual quality of

GP. 25-3

4

a major entrance to Washoe County, (2) is not visually compatible with surrounding uses, (3) does not maintain the existing scenic quality of the hills that it crosses, and (4) does not preserve or enhance the visual qualities of the North Valley Area as viewed from U.S. 395."

6. The proposed substation at Bordertown is considered inconsistent with the established BLM VRM Class III management prescriptions. The visual impact is considered significant, resulting "in a strong degree of visual contrast and a high level of change in the existing landscape." It would be "quite prominent, would attract viewers' attention, and would dominate the existing viewshed" (ref: C.13-44).

7. The impact on prehistoric and historic cultural resources would be significant (see Draft EIR/S March 1995 ES-23,24).

GP. 25-3

Please include our concerns in your consideration of the Final EIR/S.

Thank you for your attention.

Sincerely,

Charlton Ray & Sydney A. Embry
15055 U.S. 395 N.
Reno, NV 89506
(702) 677-2842

cc: Sierra Pacific Power Co.
Joanne Bond, Washoe County Commissioner
City of Reno/Community Development Dept.
State of Nevada/Public Service Commission
Reno Gazette-Journal
KOLO-TV News, Channel 8-ABC
KRNV-TV & Radio News, Channel 4-NBC
and 101.7 FM Radio
KTVN-TV News, Channel 2-CBS

RECEIVED MAY 0 1 1995

John Kershaw
Katherine Matley Kershaw
2900 Pinebough Ct.
Reno, NV 89509
702/825-5400

April 28, 1995

General Public Comment Set 26

Julie Halligan/ Peter Mumm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Ste. 218
Agoura Hills, CA 91301

RE: CPUC Application Number 93-11-018
BLM Case Number CACA-31406

Dear Madam/Sir:

I would like to go on record in support for the proposed transmission line as outlined on page ES-6 of the DEIR/S Executive Summary booklet. GP. 26-1

Thank you for allowing me the opportunity to make my position known.

Sincerely,

Katherine M. Kershaw

Katherine M. Kershaw

Draft EIR/S Comment Sheet RECEIVED MAY 0 1 1995

Proposed Alturas Transmission Line

General Public Comment Set 27

Name: Dr. Charles T. Hoover
Affiliation: Honey Lake Industries, Inc
Address: 1800 Apple View Way
City: Paradise State: CA ZIP: 95969
Phone: (916) 877-7761 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406
(Honey Lake message/fax machine - 916-251-5756)

The Knapp Brothers Ranch and I are owners of 2000 acres in the Eastern Honey Lake Valley. The Project is routed through two sides of our property. We are in support of the Project. We have also offered the Alturas Project siting areas, if needed, for project materials / staging areas and communication sites.

The EIR/S appears to be an adequate draft. We would suggest the consideration of a transmission substation in the Eastern Honey Lake Valley near Cal-Neva (East of Herlong). A substation at that site would be advantageous to interconnect into L.M.U.D and Plumas-Sierra Rural Electrical Co-op. (GP. 27-1)

In addition, we are (as well as Raytheon Engineers & Constructors) are studying the feasibility of a 220MW gas turbine Electrical Generation Plant near Cal-Neva (East of Herlong). A substation location near Cal-Neva would be advantageous to the local communities in Lassen, Sierra, and Plumas Counties for a dependable local power supply. (The project would desire the Gas supply from the Tuscarora Gas Project.

Thank you.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

General Public Comment Set 28

RECEIVED MAY 0 1 1995

27 APRIL 1995

TO WHOM THIS MAY CONCERN,

We bought our home in Horizon Hills, Reno Nevada after spending 20 years living where Uncle Sam sent us with the U.S. Army. This is our retirement home, our piece of the American Dream.

We bought this home in 1991 after 5 months of house hunting because of the unkempt landscape of Peavine Peak as an extension of our backyard. This untouched beauty of wide open space in its natural state is what captured our hearts and was the deciding factor of purchasing this particular home. It is a visual example of Earth in its finest desert existance. The hillside of rolling earth existing with nature as it has for hundreds of thousands of years. A recreational playground for people who respect these surroundings.

We are literally sickened inside by the Alturas Project with Sierra Pacific The idea of Peavines' sacred grounds being raped unnecessarily is completely unconscionable. There has to be an alternative to run this power line in some other way or along a different route.

We are concerned, deeply concerned,of the change in electrical fields effecting nature, the ponds, the animals and the people. This is a play area for children, a playground for adults and home for animals. This goes beyond just a visual eyesore. GP. 28-1

We fell in love with the peacefulness of our area. The wind is usually the only noise here and an enjoyable part of the song of nature. We do not wish to sacrifice the quietness for the hum of a high voltage power line. This would be a constant reminder of a direct cause in the support of sacrificing nature for the Almighty Dollar.

We are a small sub-community of 140 homes where each life, every Soul is adversely objecting to this power line being forced into our lives. Please, we ask that you become as concerned as we are and find an alternative route. There has to be another way which will benefit everyone involved with or by this power line project. I can't believe this is possibly a "done deal".

People working together to benefit the whole of a neighborhood, the whole of the community as well as the whole of mankind is what we need to be teaching our children, each other and use as a goal to live by. It's truely imperative we become conciderate to each other and conscious of our decisions effecting mankind, nature and the Earth itself. Please help us keep our area- our piece of Heaven on Earth- untouched by the Alturas Project. Please.

W. Scott Smiley
Denise A. Smiley

W. Scott Smiley
Denise A. Smiley
8270 Mohawk Lane
Reno, NV. 89506

RECEIVED MAY 0 1 1995

Tree Care Incorporated

A Merger Of Austin B. Carroll & Son and Sta-Green Tree Service

General Public Comment Set 29

April 25, 1995

(415) 703-2045

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

Attn.: Julie Halligan

RE: Alturas Intertie Project
CPUC #A93-11-018
BLM # CAC-31406

Dear Ms. Halligan:

I am the new owner of the Ferguson Ranch, Parcel #'s 22-10-45, 22-10-53, 22-120-10, 22-120-39 and 22-120-43 in Alturas, CA, Modoc County. In May of 1994 I purchased the ranch and have proceeded to secure funds from the California Fish and Game Department to improve wetlands along the Pit River on my property with up to seven (7) or more ponds and wildlife enhancement areas. The proposed project appears to cross this area of my property. In reviewing the environmental impact report there appears to be no mention of the affects or impacts this intertie line will have on my plans or the wetlands enhancement program that I have started on my ranch.

At this time I would like to register my objection to the Proposed Intertie Project and the omission of the impacts this line would have on my property and the wetlands enhancement project. GP. 29-1

In addition to this area of concern on my property, the Pit River Crossing and Daggart Canyon were mentioned or identified during the scoping process as two (2) areas of major concern. The DEIR did not address nor consider re-alignment around these areas that were identified as sensitive. It is my opinion that alternative routes should be studied other than the ones that have been provided by Sierra Pacific. GP. 29-2

Sincerely,

Michael W. Hutnick

MWH/jh

cc: Julie Halligan/Peter Hum
% Aspen Environmental Group
30423 Canoed Street, Suite 218
Agoura Hills, CA 91301

11530 Elks Circle • Rancho Cordova, CA 95742 • P.O. Box 1247, Carmichael, CA 95609-1247
(916) 852-9500 • FAX (916) 852-9585

Tamia Marg ✉ 4885 Grizzly Peak Blvd ✉ Berkeley, CA 94705

California Public Utilities Commission
Attention: Julie Halligan, Project Manager
Commission Advisory and Compliance Division
Energy Advisory Branch
505 Van Ness Ave, Room 3207
San Francisco, CA 94102

General Public Comment Set 30

April 27, 1995

Dear Ms. Halligan,

I am a part-time resident and frequent visitor to Long Valley in Lassen County where the Sierra Pacific Power Co. is proposing to put a transmission line, part of the Alturas Intertie Project. SPPC has chosen to run their line down a pristine desert valley while treating the people who live there with nothing but disrespect and lies. The more the local people impacted by the planned line have dealt with SPPC the more they have been exposed to their lying and hypocrisy. This line should not be built at all. It appears that this project is not a necessity at all, but a way to serve new customers they hope to get in the Central Valley of California and line their own pockets. It was not till very recently that they divulged they had bought another power company in Washington and are hoping to defray costs by selling power to the central valley. SPPC's duplicity in these matters has been frustrating for us the landowners who are getting trodden on as SPPC pushes through its project. This small valley is beautiful for being undeveloped, and that is just the reason SPPC wants to blight it with their line- they know there will not be as many voices to complain. If this line is built it will be a precedent for a power line corridor. There is already an existing corridor to the east which can accommodate a line which could easily supply any needed electricity for future growth in this region. The obvious purpose of such a huge line proposed by SPPC is for export to other regions. There is no need for such a massive line in this area especially in light of the new local technologies which are currently coming on line such as solar electric, low temperature geothermal, and ultra efficient hardware. Do not let SPPC rush through this massive building project which will despoil and uglifly the region for centuries. Please deny any company from defacing the public and private land like this. Please make sure that this is truly a dire necessity of the local existing customer base not just a political maneuvering on the part of SPPC for selfish motives. They have made access to their plans difficult and have treated the local residents with arrogance and disdain. GP. 30-i

Future generations will judge your decisions.

Please decide wisely.

Sincerely,

5.29.95

RECEIVED MAY 0 3 1995

PETER HUMM
CPUC/BLM
AGOURA HILLS CA
RE: 93.11.018 CACA 31406
PETER:

General Public Comment Set 31

REGISTER ME AGAINST CONSTRUCTION OF THE ALTURAS - RENO TRANSMISSION LINE FOR TWO REASONS:

1. UGLY, PERMANENT, UNNEEDED AND EXPENSIVE
2. FUTURE TECHNOLOGY WILL RENDER IT DEAD SOON.

GP. 31-1

THANK YOU —
CITIZEN, TAXPAYER, VETERAN
ED. ANDERSON
BOX 207
DOYLE CA 96109

RECEIVED MAY 0 3 1995

General Public
Comment Set 32

April 21, 1995

JULIE HALLIGAN - PETER HUMM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Sirs,

I would like to address the proposed Alturas Intertie, CPUC # A93-11-018 or BLM # CACA-31406. When the Environmental Impact Study for this project was put out to bid, it was stressed in that bid proposal that routing be very carefully considered and offered as a mitigating factor. Aspen Environmental has recently released the Draft Environmental Impact Study. It appears that routing in terms of mitigation for the public was never attempted. I would like to see some minor route realignments in some of the biologically and visually sensitive areas. GP. 32-1

Sincerely,

Lesley Chace

Lesley Chace
P.O. Box 1743
Alturas, CA 96101

Gary A. & Lois I. Smyres
1790 Brunetti Way
Sparks, Nevada 89431
Home phone: 702 358-2723

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

General Public Comment Set 33

Dear Ms. Halligan and Mr. Humm:

This letter concerns the Alturas Transmission Line Draft Environmental Impact Report/Statement (DEIR/S), CPUC Application Number (93-11-018) and BLM Case Number (CACA-31406).

We are building a home near the top of Hoge Road in the area of the last 4 miles of the transmission line that terminates in Reno, NV. The proposed transmission line will cross what will soon be part of the Rancho San Rafael Regional Park. This park is less than 1 mile from downtown Reno, on the Southern end, and when the last land swap is confirmed will be larger than the San Francisco Golden Gate Park. Points of potential serious impact concern the uses of this park: (1) The Reno Balloon Races (over 100 balloons are launched each day of the event) are held every fall in this park and in the last two years dozens of balloons have landed in the area of the proposed transmission line. One of the most common causes of balloon accidents is contact with transmission lines. (2) Future development of the park will involve the construction of art museums, etc., and people use areas. The construction of a 345 kV AC power line will effectively eliminate a sizable portion of the park for development. A successful Texas school district suit against a power company (mentioned in the last deposition meeting in Reno) sites a Russian study concerning the dangers of electromotive fields associated with high voltage transmission lines. GP. 33-1

We first propose that you consider locating the proposed 345 kV AC transmission line along the already existing 1,000 kV DC power line corridor that passed though the Wadsworth, NV, area. This route passes closer to most of the Nevada mines and still comes into Reno. If the presently proposed location was chosen to supply Northern California and you feel it is not practical to relocate the line, I suggest you bury the line in the Reno area. If a 345 kV DC power line cannot be buried I suggest you drop the voltage in the Reno area to a level that can be buried. GP. 33-2

Best Wishes,

Gary A. Smyres 5/2/95

Lois I. Smyres 5/2/95

General Public
Comment Set 34

RECEIVED NOV 08 1995

Please do not destroy new swaths of public (or private) land and our precious viewscapes for needless profiteering by the Sierra Pacific Power Company. We the consumers will gladly pay higher rates if necessary.. rather than have low rates maintained with further rape of our environment. The open spaces are my soul's food. Use existing corridors and let your citizen's quality of life be the bottom line (and some concern for the wildlife which lives helplessly in the park?) not the allmighty $. Peace

Jeff Carlton

1701 N. Division St.
Carson City, NV
89703

GP 34-1

General Public
Comment Set 35

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

May 2,1995

RE: Application # 93-22-018, BLM Case# CACA-31406

Dear Ms. Halligan and Mr. Humm,

My feelings about the Alturas Transmission Line Project EIR/S are twofold. My first concern is the effect it will have on the environment. For years we've been hearing about the dangers of electromagnets fields, their link to cancer in those who are exposed to high levels of EMF over an extended period of time. I'm a little skeptical and a lot doubtful that the propaganda mailed to me in regards to this project and it's harmlessness. When a monopoly such as Sierra Pacific Power Company says something's for the betterment of our community I immediately have my doubts that our convenience and needs are first and foremost in the minds of those pitching the sale of this deal.

My second concern is the effect it will have on the landscape. 130 foot towers of wire running for miles over hills and through neighborhoods such as mine are not my idea of physically appealing. I will look out over the view of Peavine Mountain and see nothing but massive metal monstrosities lining the hillside and running parallel to my neighborhood. This eyesore would mar the hills and would be seen for miles around. I'm having a real hard time imagining how anyone who lives within miles of these power lines will maintain high property values, no one wants to live near them, I sure don't. GP. 35-1

I am opposed to this project. I don't care how important the power company says it is for our community. The reason my husband and I bought this house was for the view we have of Peavine to the west of us and that would be ruined if this project is allowed to proceed.

I would appreciate more consideration and deliberation in this matter before we're ramroded into a situation we'll not be able to change once completed.

Sincerely,

Sharon Earle

Sharon Earle

General Public Comment Set 36

B.L.M. RE: NO WIRE 4.28.95

RECEIVED MAY 0 8 1995

If the line goes through Do we get A PROMISE, GUARANTEE TO lower RATES FOR X-MANY of YEARS — IN WRITING!! I don't think so. What's in it for the public? I AGREE WITH HERMAN, learn to use what you have — like the REST of US.

GP. 36-1

MAY 1 1995

Dale Pravo
1300 Y 0066
RENO 89570

OPINIO

YOUR TURN

New power line would be blight on the landscape

PAUL HERMAN

Sierra Pacific Power Company plans to build a 345,000 volt transmission line from Reno to Alturas, Calif. The proposed route covers 140 miles of northeastern California and 25 miles in Nevada. To myself and my neighbors who live along the line, this is very bad news. The beauty and usefulness of the land would suffer mightily under the presence of this power line.

The easement would be 165 miles long, 130 feet tall and 160 feet wide. The visual presence is larger, miles wide. It would be fabulously ugly, for sure.

If you want to see just how ugly, drive north on U.S. 395 and observe the power lines that come from the east near Truckee Meadows Community College, jump the highway and turn south to Valley Road Substation.

SPPCo claims this line is needed to supply additional power to the Reno-Tahoe area and improve reliability. I believe there are other reasons. Power companies make money by many different routes, selling retail to residences and businesses and wholesale among themselves. Trading in wholesale electricity is called "wheeling" and in order to do it, power lines like this one are essential.

Years ago as part of long-range planning, the federal government gave the power industry, free of charge, huge swaths of the west to use as power transmission corridors. What SPPCO is trying to do is establish a new power corridor in the eastern Sierra in order to take a larger share in the electrical market. At 160 feet in width, it would affect over five square miles. At 666 feet it is 20.5 square miles.

I question whether this is for "the public good" or only the bottom line for SPPCo. I don't at all like the idea of the BLM and U.S. Forest Service making further gifts of land to big power companies. To subsidize then further looks like welfare for the rich on a massive scale.

It would trash the environment in the Modoc Plateau, The Honey Lake Valley, Long Valley on Peavine Peak, etc. It doesn't seem unreasonable to expect SPPCo to use existing corridors and not try to take another one in a scenic area.

If you drive north on 395, past Halellujah Junction and down Long Valley, you come to the Red Rocks area. There are lovely views to the east of the Red Rocks and to the west of Adams Peak (8,197 feet) and the Long Valley Creek wetlands. The BLM has insisted the line be run on the west side of the valley, jumping the highway and creek twice in order to preserve the view of the Red Rocks. Either way will spoil the beauty of this valley, and the westernmost route destroys wildlife values to boot.

I think we have subsidized big power enough already and it is time to say *no* to more corporate welfare. The BLM should refuse to grant them another swath of our land.

You can write them a letter post-marked May 3 or before. Send it to the Susanville District, contact person Pete Humm, Phone (916) 257-0456.

Paul Herman lives in Doyle, Calif.

Ditto!
4.28.95

RECEIVED MAY 10 1995

May 8, 1995

General Public Comment Set 37

RE: CPUC App.No. 93-11-018 & BLM Case No. CACA-31406

Dear Julie Halligan and/or Peter Humm:

Hello & Good Morning,

The Jesuit Fathers and I own 80 acres in lassen County and are are quite concerned over he proposed HIGH VOLTAGE TRANSMISSION LINES that are to be built near our property.

As a licensed Real Estate Broker for over 30 years, I know what TRANSMISSION LINES/TOWERS can do to the value of land.

The close proximity of those huge TOWERS definitely lower the value of raw land as it restricts the use and the views of the ultimate user of the land.

To preserve whatever value we now have plus insure us of add-on inflation/demand for our land,

WE MUST VEHEMENTLY OPPOSE ANY ACTION THAT WILL ADVERSELY EFFECT THE VALUE OF OUR LAND.

I paid dearly for this land a few years ago, and although it is of no concern to some people, I must limit our losses and use good business judgement to conserve while improving my estate for myself, the good Fathers of Bellarmine High School and the Catholic and non-Catholic students of Bellarmine and my Daughter and my three Grandchildren, who are my heirs.

If we cannot stop the intrusion of this huge project, our alternative would be to EXCHANGE this 80 acres for other property of equal or greater value.

As one can tell from a title search, I owe Mr. & Mrs. Watkins a goodly sum on a Note & Deed of Trust on this land. They too, must be protected from a loss.

While I feel compassion for the people who need the power in Nevada, I must firstly and foremostly protect the value of this investment.

I look forward to your serious comments regarding my stand and your comments as to a possible trade for other, non-effected, land in California, Oregon, Washington or Nevada.

GP, 37-1

Sincerely,

Robert L. Hess- Co-Owner

Robert L Hess
73430 Sonny Trl
Palm Desert CA 92260-6113

cc Fr. Daniel Weber, Bellarmine Prep

General Public
Comment Set 38

ALTURAS TRANSMISSION LINE
PROJECT EIR/S

RECEIVED MAY 1 1 1995

5-7-95

TO WHOM IT MAY CONCERN:

WE DO NOT WANT THE POWER LINE THROUGH OR NEAR OUR PROPERTY - WE MOVED HERE 16 YEARS AGO - THE POWER LINE WILL DISTROY THE BEAUTY WE SEE EVERY DAY. (GP. 38-1)

PLEASE KEEP ME ~~AWAY~~ ONTOP OF WHAT IS GOING ON.

THANK YOU.

ELLEN + ROGER ERIKSON

Ellen Erikson

(916) 233-3062

P.O. BOX 1779

ALTURAS, CA 96101

P.S.
DEER, DUCKS, GEESE COME TO DRINK AT OUR POUND - WE HAVE SEEN EAGLES AND MOUNTAIN LION ALSO. WE ALSO HAVE A CREEK WITH FISH.

RECEIVED MAY 1 1 1995

Robert C Ryan
110 Silverstone Place
Reno, Nv,89512

May 5th,1995

Subject: Alturas Transmission Line Project Eir/s.

General Public Comment Set 39

To: Julie Halligan/Peter Humm
CPUC Application Number (93-11-018) and BLM Case number (CACA-31406)

I would like to make a comment in reference to the above subject. It is my understanding that the new transmission Line Towers will be 130' tall and this line along with its towers will be about 600 yards behind my house in Reno, Nv. This would drop my property value about $40000 dollars if I could even sell my home with the large towers behind me?? GP 39-1

It is hard for me to believe that our local power Co, SSP, would even think of doing something like this. This move by the power Company is for profit and profit only and they dont care what they are doing to the people who will have to live with these monsters in their back yard.

I would like it to be known and made part of your hearing that I am ageanst this project.

Yours truly

Robert C Ryan
Colonel Retired

William C. Thornton
Attorney at Law

RECEIVED MAY 12 1995

May 10, 1995

General Public Comment Set 40

Julie Halligan
Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Re: Alturas Transmission Line - Project EIR/S
CPUC Application Number: 93-11-018
BLM Case Number: CACA-31406

Dear Ms. Halligan and Mr. Humm:

On August 16, 1993, My wife and I donated 120 acres to the Washoe County Park Foundation as an addition to Rancho San Rafael Park.

I understand that the proposed route of the Alturas Transmission Line would allow for a portion of the power line to go through the northern boundary of the new enlarged Rancho San Rafael Park.

It was our intention that the area be for open space. I am enclosing a copy of the deed which was recorded on this property which includes several restrictions to keep it an open space.

In line with the intent and spirit of our gift, and general policies of keeping parks as "open space", we oppose the proposed line through Rancho San Rafael Park.

GP. 40-1

Sincerely,

William C. Thornton

WILLIAM C. THORNTON

WCT:sr
cc: Jim Shaw, Chairman-Washoe County Comm.
Gene Sullivan
Steve Walther
Bill Albright

Enclosure

One East First Street • Suite 1405 • Reno, Nevada 89501 • (702) 348-7700

RPTT - 57.40 ~~EXMPT~~

APN: a portion of 003-130-39

WHEN RECORDED, RETURN TO:
Grantee:
Washoe Parks Foundation
3500 Lakeside Court, Suite 140
Reno, Nevada 895095

33305-CK

1709635

GRANT DEED

The undersigned grantors, WILLIAM C. THORNTON and BARBARA C. THORNTON, husband and wife, as community property, do hereby grant, transfer and assign to WASHOE PARKS FOUNDATION, a Nevada nonprofit corporation, and to its successors and assigns forever, all of that certain real property located in the City of Reno, County of Washoe, State of Nevada, being a portion of the North 1/2 of Section 34, T20N, R19E, MDM , shown as Parcel C on a Record of Survey recorded in the Office of the County Recorder of Washoe County, Official Records, on September 3, 1993, at Book No. _____, Page No. *** , and more particularly described in Exhibit "A" attached hereto and hereby made a part hereof.
*** Document No. 1709631.

Together with all of grantors' right, title and interest in and to all water rights, mineral, oil and gas rights, rents, royalties, profits, improvements, tenements, hereditaments and easements appurtenant thereto.

Subject to an easement in favor of The University and Community College System of Nevada dated the 16th day of August, 1993, and recorded in the Office of the County Recorder of Washoe County, State of Nevada, Official Records, on September 3, 1993, 1993, as Document No. 1709633 Book No._____, Page No. _____, for entrance and egress for the maintenance and use of a white painted rock block letter "N" monument located on Parcel D of the above referenced Record of Survey.

Subject to an easement in favor of the City of Reno dated the 16th day of August, 1993, recorded in the Office of the County Recorder of Washoe County, State of Nevada, Official Records, on September 3, 1993, as Document No. 1709634 Book No._____, Page No. _____, for entrance and egress by the sponsors of a certain flood control dam construction contract with the United States Soils Service, Department of Agriculture, their contractors, employees, servants, agents, successors and assigns, for the construction, use, maintenance and repair of the said flood control dam, flood pool and appurtenant and related structures.

Subject to the following restrictions and covenants, which shall run with the land and bind the subject property in perpetuity and to which the grantors, their heirs, successors and assigns forever, retain the right in perpetuity to take such legal action as is necessary to enforce:

1. There shall be no construction or maintenance of permanent enclosed structures, buildings or other structures inconsistent with the conservation and maintenance of the property as a natural park, open space and outdoor recreational area.

2. There shall be no construction or maintenance of overnight camping accommodations or mobile homes, billboards or other advertising material on the property.

3. There shall be no dumping of ashes, trash, garbage or other unsightly or offensive material, hazardous substance or toxic waste in, on, or under the subject property.

4. There shall be no operation of snowmobiles, dunebuggies, motorcycles, all-terrain vehicles or any other type of off-road or cross country motorized vehicles on the property.

5. There shall be no hunting or trapping except to the extent necessary to keep the animal population within the numbers consistent with the ecological balance of the area.

6. There shall be no exploration for, or development and extraction of, minerals and/or hydrocarbons on the subject property by any method that would impair and interfere with the conservation, open space, park, recreational and scenic value of the subject property.

Nothing in these restrictions shall, or is intended to, limit the ability of the City of Reno, and its partners, agents, contractors, co-sponsors, successors and assigns, including the Soils Conservation Service, United States Department of Agriculture, to construct and maintain a flood control dam and flood pool on and about the Evans Creek drainage area, to mitigate wetlands affected by the construction of the above dam and flood pool and to construct and maintain foot, equestrian and non-motorized bicycle paths and trails on Parcels A and B of the herein described Record of Survey, or the ability of The University and Community College System of Nevada to maintain and use the white painted rock monument historically known as the University of Nevada Reno "N" as it currently exists on Parcel D of the above referenced Record of Survey.

APN:

DATED this 16 day of August, 1993.

GRANTORS:

WILLIAM C. THORNTON

BARBARA C. THORNTON

State of Nevada)
) ss.
County of Washoe)

On this 16 day of August, 1993, before me, the undersigned, a Notary Public in and for the County of Washoe, State of Nevada, duly commissioned and sworn, personally appeared WILLIAM C. THORNTON, personally known to me or proved to me on the basis of satisfactory evidence, to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same freely and voluntarily and for the uses and purposes therein mentioned.

NOTARY PUBLIC

SHANNON RECHENMACHER
Notary Public - State of Nevada
Appointment Recorded in Washoe County
MY APPOINTMENT EXPIRES JULY 24, 1997

State of Nevada)
) ss.
County of Washoe)

On this 16 day of August, 1993, before me, the undersigned, a Notary Public in and for the County of Washoe, State of Nevada, duly commissioned and sworn, personally appeared BARBARA C. THORNTON, personally known to me or proved to me on the basis of satisfactory evidence, to be the person whose name is subscribed to the within instrument, and acknowledged to me that she executed the same freely and voluntarily and for the uses and purposes therein mentioned.

NOTARY PUBLIC

OSGOOD
ENGINEERS

August 4, 1993

Thornton Property
Parcel C (Remainder)
120.7880 Acres

LEGAL DESCRIPTION

All that certain parcel situate in the City of Reno, Nevada, being a portion of the North 1/2 of Section 34, T20N, R19E, M.D.M., and being more particularly described as follows:

BEGINNING at the West 1/4 corner of Section 34, T20N, R19E, M.D.M.; thence along the following seven (7) courses:

1. N 01° 06' 59" E, 2663.58 feet to the NW corner of said Section 34;
2. S 89° 50' 46" E, 2577.62 feet along the north line of said Section 34;
3. S 50° 28' 12" W, 655.42 feet;
4. S 10° 30' 31" W, 844.12 feet;
5. S 39° 06' 57" W, 760.62 feet;
6. S 50° 37' 42" E, 1346.07 feet;
7. N 89° 12' 28" W, 2530.98 feet to the point of beginning.

Excepting therefrom the following described parcel:

All that certain parcel situate in the City of Reno, Nevada, being a portion of the North 1/2 of Section 34, T20N, R19E, M.D.M., and being more particularly described as follows:

Commencing at the West 1/4 corner of Section 34, T20N, R19E, M.D.M.; thence N 27° 02' 47" E, 1005.77 feet to the POINT OF BEGINNING; thence along the following four (4) courses:

1. N 29° 20' 53" E, 250.00 feet;
2. S 60° 39' 07" E, 250.00 feet;
3. S 29° 20' 53" W, 250.00 feet;
4. N 60° 39' 07" W, 250.00 feet to the point of beginning.

PROFESSIONAL LAND SURVEYOR, STATE OF NEVADA
MARVIN HAMRICK
No.3917

Marvin Hamrick

Osgood Engineers, Inc. • 130 Vine Street • Reno, Nevada 89503 • 702/329-2911 • FAX 702/329-6469
Civil Engineers • Planners • Traffic • Air Quality • Surveyors

RECEIVED APR 28 1995

4/23/95

Julie Halligan
CPUC
505 Van Ness Ave.
San Francisco, CA 94102

General Public Comment Set 41

RE: Alturas Intertie
CPUC # A93-11-018

Dear Julie,

Several letters were written during the scoping process in regards to using existing utility corridors for this project. Using existing utility corridors to the maximum extent possible is dictated in every government entity's plan and is supported by the public.

It was asked, during the scoping process, that maximizing the use of existing corridors be addressed, and yet the DEIR makes no attempt to address this important and universal concern. There are several opportunities to maximize the use of existing corridors without compromising the objectives of the project or creating increased environmental impacts, and they should be explored in the EIS.

Maximizing the use of existing utility corridors could involve placing the substation in, or as near possible, an existing corridor. This can occur, without increased impacts, at the tap-in point and would represent a form of mitigation to this concern.

Maximizing the use of existing utility corridors could involve complete, partial, or minor route realignment. The DEIR makes no attempt to encourage or independently explore alternate routes that would help achieve this goal with equal or less environmental impacts. Alternate routes with this very acceptable goal in mind should be studied in detail in the EIR.

GP. 41-1

Sincerely,

Thomas F. Kraucl
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED APR 28 1995

4/22/95

Julie Halligan
CPUC
505 Van Ness Ave.
San Francisco, CA 94102

RE: Alturas Intertie
CPUC # A93-11-018

Dear Julie,

May 20, 1994 I sent you a video tape that documented some wildlife concerns and showed a pair of low flying geese using Daggert Canyon as a flight corridor. November, 1994 I sent Aspen a letter documenting the extensive night time low flying waterfowl migration which was using this same flight corridor. This migration occured during the first three weeks of November with the first significant winter storms. I asked that this be addressed in the DEIR and it was not.

Low flying, night time migrations of waterfowl during stormy weather, using Daggert Canyon as a flight corridor, could be significantly impacted by this Project. I would like to request, again, that this be addressed in the EIS.

GP. 41-2

Sincerely,

Thomas F. Kraucl
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED APR 28 1995

4/22/95

Julie Halligan
CPUC
505 Van Ness Ave.
San Francisco, CA 94102

RE: Alturas Intertie
CPUC # A93-11-018

Dear Julie,

The sociological and psychological impacts of this Project on the human residents of Modoc County were not properly addressed in the DEIR.

During the "Public Scoping Meeting" in Alturas May 18, 1994, I requested that the uniqueness of the Modoc resident be taken into consideration and addressed in the DEIR. It is quite obvious that the values of the human inhabitants of Modoc County are quite different from the values of the rest of the people inhabiting the state of California. These values are lead by the importance of visual well being, and followed by biological values. This is not documented by formal scientific studies, but by general opinion and informal surveys. When given a choice, people stay in Modoc County or move to Modoc County not for jobs or money, but for views and biological resources. Homes are not built based on proximity to schools or shopping malls, but based instead on views. Weekends are not spend going to the theater or a shopping mall, but are spent fishing, camping, hunting or observing wintering deer.

GP. 41-3

Due to Modoc County's open, expansive views, and the relative value of these views to it's residents, the human inhabitants of Modoc County will be sociologically and psychologically impacted by this Project. Not only will they be impacted, but they will be impacted in an abnormal and disproportionate way relative to the average human inhabitant of this state.

Visual perception is a psychological extension of a physiological process. Information ("views") are gathered by the eyes and sent via the optic nerves to the visual cortex of the brain. Here the information is integrated with memory and expected values. A physiologic response is elicited which, depending on past experience and expected values, will elicit a psychological response. A psychologic response may be expressed in various ways or not at all, but if expressed will probably induce a sociological response. If not expressed initialy, a cumulative effect may or may not occur, and in either case, a sociological response may still follow.

If visual memory and expected visual values are abnormal (no industrial structures), the psychological and sociological responses related to the changed environment will also probably be abnormal and could potentially result in depression and lack of ambition.

The only man made structures in Modoc County over 100 feet are two radio towers. Think about this - every human in Modoc County over the age of six can probably tell you where these radio towers are! Numerous 130 foot structures all interconnected with wires on an otherwise expansive, open environment will be, by far, the heaviest visual impact ever proposed for Modoc County. The psychological and sociological impacts will be relatively severe.

GP. 41-3

Behavioral studies of sandhill cranes are fairly completely addressed in the DEIR, and mitigation measures are calculated and proposed based on these fairly specific studies and yet the human psychological and sociological impacts of converting from an open, pristine viewshed to an industrial one are not addressed and therefore no mitigation is proposed. Please address and provide mitigation for these very significant impacts that would result from the Proposed Project.

Sincerely,

Dr. Thomas F. Kraucl
1201 Thomason Ln.
Alturas, CA 96101

RECEIVED APR 28 1995

4/22/95

Julie Halligan
CPUC
505 Van Ness Ave.
San Francisco, CA 94102

RE: Alturas Intertie
CPUC # A93-11-018

Dear Julie,

Daggert Canyon is located just north of Hwy 299 and will be heavily impacted by this Project. Daggert Canyon is a heavily used deer wintering area. It is also a heavily used raptor area. Both of these concerns were expressed during the scoping process.

Where the Proposed Project (Segment A) crosses Hwy 299 is an area of special wildlife concern. It is an area of heavy winter deer mortality for several reasons. On the south side of Hwy 299 is meadow and yet on the north side is brush, juniper and upland. This is an ecotone or edge ecosystem, and deer frequently concentrate in this area. Wintering deer are attracted to the salt used on Hwy 299 to reduce icy highway conditions. Wintering deer are also attracted to the uncovered vegetation (by the warming asphalt) at the highways edges. All this results in many deer being killed by autos negotiating icy winter roads. This general area is seen in KOP #4 (copy enclosed). The junipers on the north side of Hwy 299 are on my property and are earmarked to be cut and/or trimmed, at the suggestion of biologists, in an effort to increase driver visiblity of deer in this area thereby reducing deer mortality. This may conflict with Aspens statement of junipers shielding the view of the Project to eastward drivers (see pg C.13-33 of the DEIR) and should be further addressed in the EIS. GP. 41-4

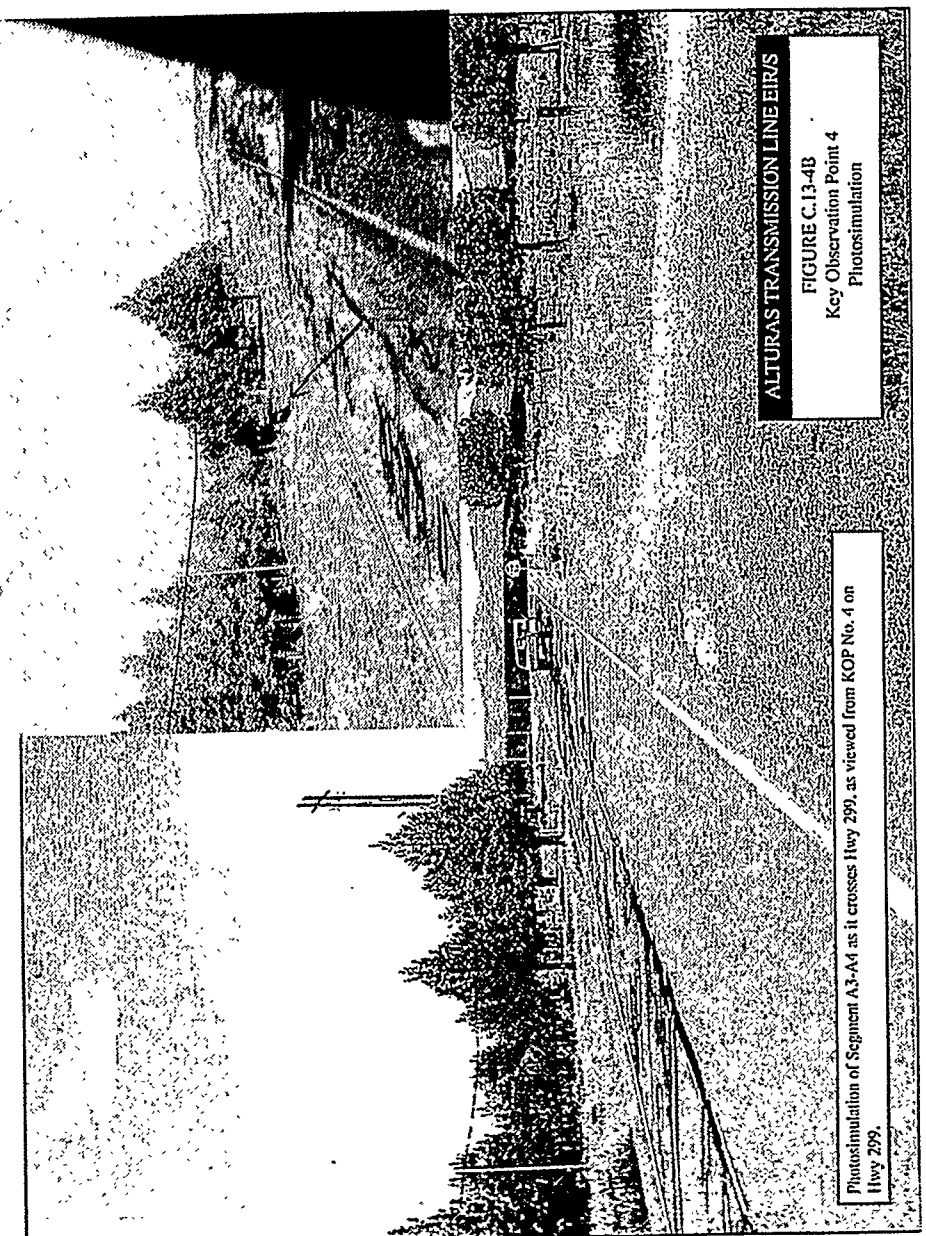
Diversion of drivers attention by the power line (visual, adjusting radio due to interference from the line, etc.) could increase the incidence of deer mortality in this area and was not addressed in the DEIR.

Eagles (both bald and golden) heavily use the Daggert Canyon area in the winter time. It is well documented (see photos) that they feed on road killed deer located on the edge of Hwy 299 at and near the Proposed Project crossing. It is also well documented that eagles will panic flush in response to motorist activities. Panic flushes of eagles are relatively common in this area due to the above mentioned factors. The Proposed Project may increase eagle mortality as eagles panic flush into overhead power lines. GP. 41-5

The impacts mentioned above were not addressed in the DEIR, but should be addressed in the EIS. Mitigation for these impacts should also be proposed. Removal and selective thinning/pruning of junipers on the north side of Hwy 299 to increase driver visibility in this area will be done by myself, regardless of whether or not the Project is constructed. Offsite mitigation for these impacts would not be appropriate as wildlife impacted are primarily migratory. GP. 41-6

Sincerely,

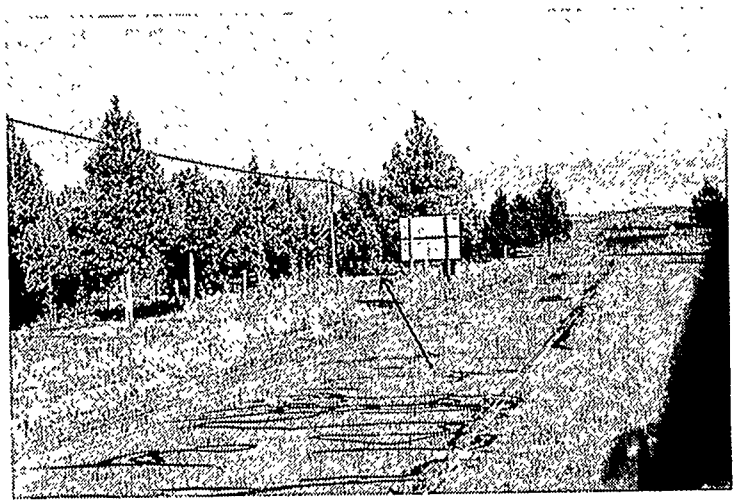
Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101



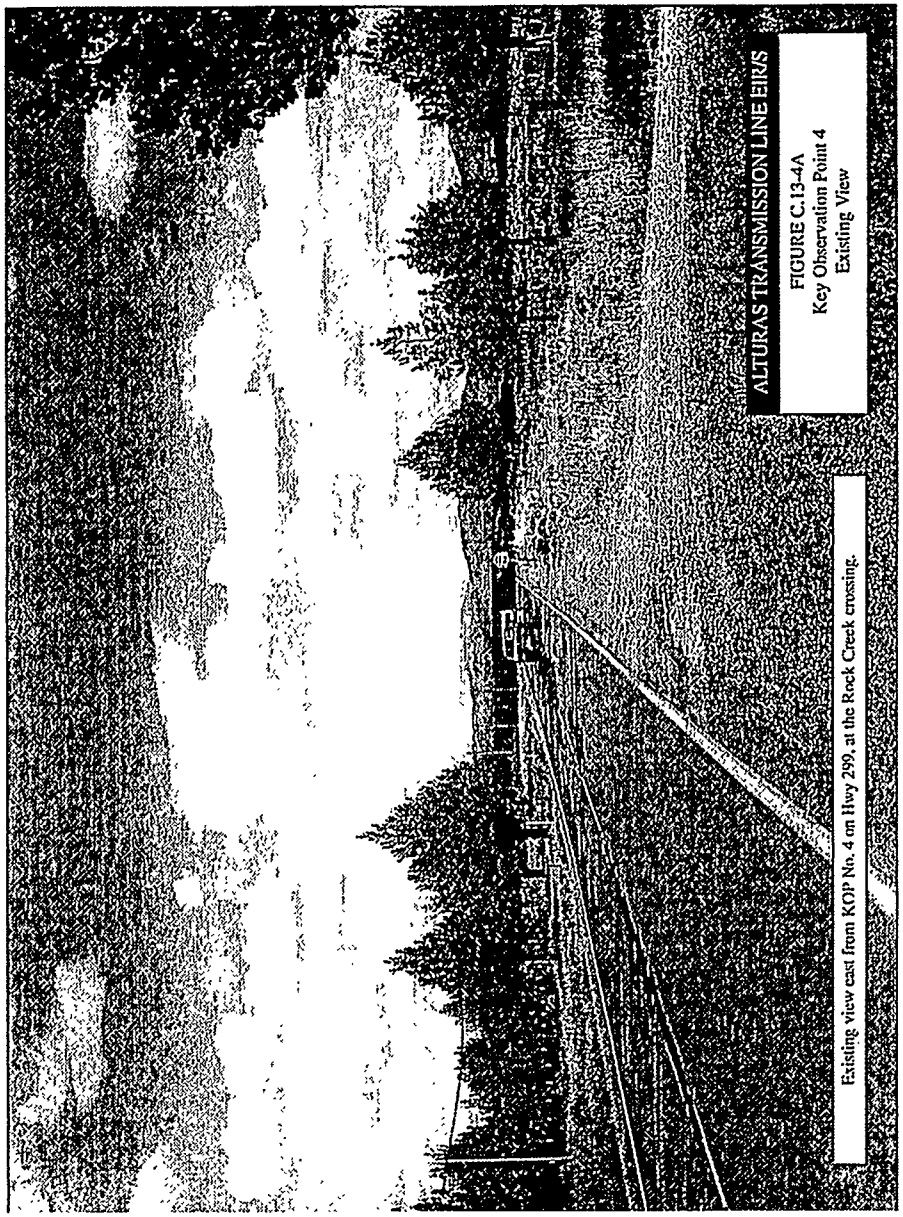
ALTURAS TRANSMISSION LINE EIR/S

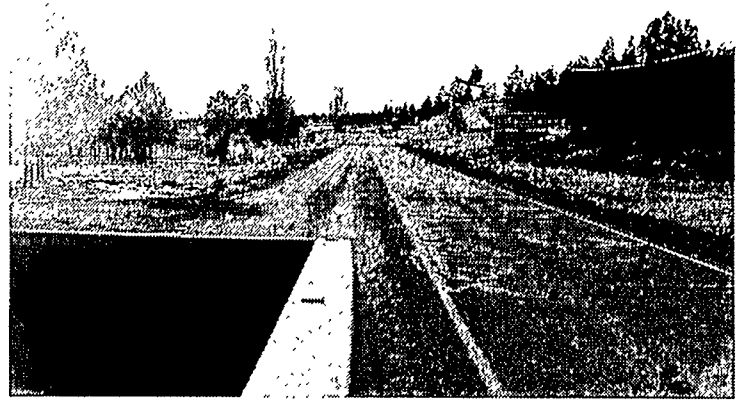
FIGURE C.13-4B
Key Observation Point 4
Photosimulation

Photosimulation of Segment A3-A4 as it crosses Hwy 299, as viewed from KOP No. 4 on Hwy 299.

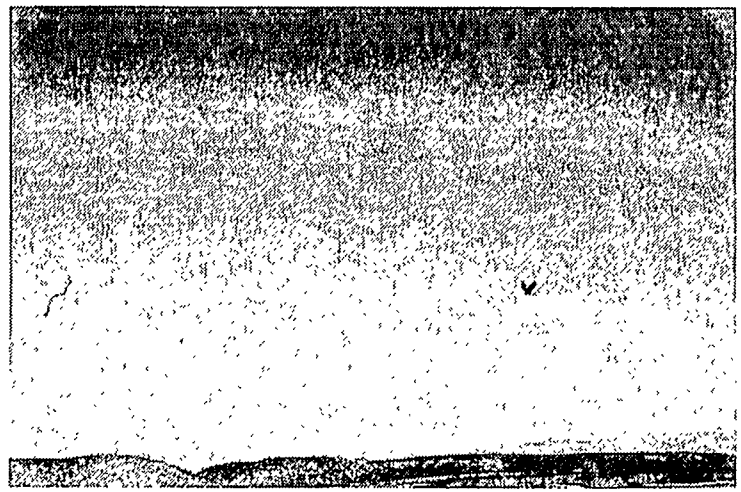


Eagles feeding on auto killed wintering deer (Jan. 1995)
near Project crossing
* arrows point to eagles





panic flush of eagle near Project crossing



eagle flying north to Daggert Canyon @ 80-100'
location is exactly where Project crosses Hwy 299

RECEIVED APR 28 1995

4/21/95

Julie Halligan
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

RE: Alturas Intertie
CPUC # A93-11-018
CACA # 31406

Dear Julie,

March 8, 1995 I attended the Modoc County Planning Commission Meeting to discuss mitigating the impacts of Segment A of the Proposed Project. Mitigation would involve a very minor route realignment around the scenic top end of Daggert Canyon and the reduction of pole height in this area to help reduce the skylining effect of the proposed route around the Canyon. Specifics of this mitigation were included in an earlier letter .

During my meeting with the Planning Commission, one of the Commissioners (recognizing the significant impacts of Segment A) suggested and discussed a different route that he felt would have far less impacts than either Segment A or Segment B. This route is a very logical route and appears to be indirectly and inappropriately addressed in the DEIR (see "USFS Alturas Alignment" on pg. B-52 of the DEIR - enclosed). Even though I am unaware of the exact USFS proposed alignment, the attached independently suggested Planning Commissioner members alignment is very similiar, and therefore, for practical purposes of this discussion will be referred to as the USFS Alternate (see pg.1). Even though I personally do not believe in the necessity of this project in Modoc County and the creation of a new utility corridor, this route (USFS Alternate) is probably the best compromise regarding the tap in point and the first few miles of the Proposed Project west of Alturas. The following is a summary of comments made by the Planning Commission Members (no formal action was taken) and others, which indicate the need to study the USFS Alternate as an alternate to Segment A or Segment B.

The Project using Segment A is 13,000 feet (2.46 miles) longer compared to the Project using the USFS Alternate.

The USFS Alternate safely avoids the zig zag pattern created in Segment A (logically avoids sensitive areas and areas identified as having public and private concern in the scoping process).

Air Quality:

Air Quality would be better using the USFS Alternate compared to Segment A due to the line length in this area being 2.3 times shorter. Also, less road construction (permanent and temporary), rock moving, blasting and emissions would be required by the USFS Alternate due to the topography of the area (see photos). The gentle, rockless, rolling hills would provide easy access for construction without road building. The rockless nature of the terrain of the USFS Alternate would mean less blasting compared to Segment A (rocky ridgeline).

GP. 41-7

Biological Resources:

Segment A is rich in biological resources due to it being an "edge" type of ecosystem and one of the few true canyons on the edge of Devils Garden.

- Segment A (above Hwy 299) is in a heavily used deer wintering area.
- Daggert Canyon is a heavily used raptor area (as many true canyons are).
- The majority of Segment A (above Hwy 299) traverses roadless, untouched areas of native populations.
- There are 16 occurrences of special status plants that would be impacted on Segment A and only one on Segment B. (USFS Alternate would probably be similiar to Segment B)
- Daggert Canyon is a migratory route for waterfowl dropping down off Devils Garden to the wetlands below. Many of these migrations occur at night and/or in stormy weather. Migratory occurences are not near so abundant over the USFS Alternate or Segment B.
- Due to much shorter line length, there would be less habitat disturbance.
- Sandhill crane collision potential would be reduced because major sandhill crane use areas are located primarily in the more westward areas (closer to Segment A).
- The USFS Alternate would have greatly reduced impacts on juniper woodland, big sagebrush scrub, montane meadow, volcanic gravels, and low sagebrush (similiar to Segment B)
- Less meadowland area of the Pit River would be crossed.
- The California Dept. of Fish and Game biological survey maps appear to show less biologic concern (eg. there are no significant deer or antelope habitat areas on the USFS Alternate north of Hwy 299)

The list goes on. Biological impacts are very significant in Segment A. The USFS Alternate is in an area that has mostly been previously impacted, hence native biological resources are not nearly as abundant. Biological resources are equivalent to those in Segment B. Both routes would have to cross the sensitive Pit River, but the USFS Alternate would cross it at an area that has already been impacted (old mill site, existing power lines, zoned industrial, airport noise, etc.) An alternate Pit River crossing point with potentially less impacts is provided on Page U of the attached and should be studied as a possible modification of the USFS Alternate or Segment B.

Cultural Resources:

Segment A is rich in cultural sites, many of which were probably not discovered by the Aspen team (for example, there is an old abandoned mine shaft within a few feet of where the proposed line would cross the eastern subcanyon at the north end of Daggert Canyon).

There are five potentially significant sites that would be impacted on Segment A (that Aspen identified). Although not documented, it is anticipated that there would be much fewer sites on the USFS Alternate (similiar to Segment B).

GP. 41-7

-2-

Much of the USFS Alternate has previously been impacted, hence potential significance of any sites that may be present on the USFS Alternate would probably be less.

Energy and Utilities:
Impacts would probably be comparable for Segment A, Segment B and the USFS Alternate.

Geology, Soils and Paleontology
Segment A crosses a potentially active fault and the substation is near another.
Segment B does not and it is doubtful (but not documented) that the USFS Alternate would either.
The USFS Alternate would require less blasting than Segment A.
Due to the rocky, nature of Segment A, there would be more ground disturbance necessary in Segment A than the USFS Alternate. Boulders and lava rocks would simply have to be moved in Segment A. There would have to be less (probably none) road construction in the USFS Alternate due to the topography of the area.

Hydrology:
Probably similiar to Segment B.

Land Use:
The USFS Alternate would have less impacts than Segment A or B.
Residential: There would be an approximate equal number of residences within the 2,000 ft. "limit" set by Aspen. Residential orientation and view shed impact of affected residences, however, was not addressed by Aspen. Home orientation, front doors and window orientation for the majority of rural homes in Modoc County is toward the east (and preferably slightly south). This affords two benefits - #1 a view of the Warner Mountains
#2 the warming morning sun of winter and protection from the afternoon sun of summer.
A lessor part of the view sheds of any potential residences near the USFS Alternate would be affected (see photos).
Segment A would dominate the view sheds of the majority of those residences within several thousand feet.

Overall residential impacts would be much more severe for Segment A than the USFS Alternate due to the skylining effect of Segment A and it's descent off a prominent point protruding into the Warm Springs Valley. The skylining effect of Segment A would be visible from most every residence in or around Alturas and from many miles from the actual line. It would be visible to a much greater extent than the USFS Alternate (please see photos) or Segment B.

If the substation were built at the tap in point of the USFS Alternate, the visual impacts would be near zero. If

GP. 41-7

the substation were built near the old mill, the visual impacts would be minimal for two reasons:
#1 The topography is relatively low in this area compared to the surround. The substation would NOT be very visible from residences in the city as Aspen has implied (see photo). Actually, the contrary would be true - Segment A coming off the ridge of Devils Garden would be much more visible.

#2 The substation would blend with the industrial complexes of the present and the future for this area (currently zoned industrial).

Recreational Usages:
The USFS Alternate would impact no recreational use areas. Segment A would impact the BLM bike route at the north end of Daggert Canyon (see pamphlet) resulting in unmitigable visual impacts. The golf course would be less impacted by the USFS Alternate (see photo) then it would by Segment A or Segment B. Their is no mitigation possible for the visual impacts of Segment A on the golf course. The Modoc County Planning Commission feels the land purchase mitigation in relation to Segment B's impacts on the golf course is a desirable mitigation.

The USFS Alternate would be entirely on private property (although total private property affected would be approximately equal to Segment A), thus recreational use would be restricted.

Crops and Agriculture:
Similiar (or even less) to Segment B and therefore less impacts than Segment A.
Less meadow lands of the Pit River would be crossed than Segment A.

Increased Human Intrusions Into Relatively Undeveloped Areas As a Result of Improved Access
The USFS Alternate would have much less impact than Segment A.
No public areas would be impacted and the proposed permanent roads at the north end of Segment A would not be necessary.

Maximizing Existing Utility Corridors
The USFS Alternate maximizes the use of the exiting utility corridor in two ways:
#1 the tap in point of the USFS Alternate is further south than the tap in point of Segment A
#2 there would be 13,000 ft less line outside of an existing utility corridor in the USFS Alternate
If the substation were located near the tap in point, more of the Project would be contained in an existing corridor. The above would then fit more appropriately into the

GP. 41-7

Energy Element of the Modoc County General Plan, most other resource plans (as most all require existing utility corridors be used to a maximum degree) and the requests of the public (as evidenced by the petitions forwarded to you last Spring and the various letters that you have recieved).

Zoning and County Land Use Plan:
If the substation were located at the tap in point, it would fit into an existing utility corridor and would be appropriate (Energy Element of Modoc County General Plan specifies that existing corridors be used). If the substation were located at the Mill Site, it would be appropriate as the zoning there is "industrial". Zoning or use is not appropriate for the substation in Segment A. Segment A impacts the Modoc County General Land Use Plan in more ways than the USFS Alternate (or any other segment of potential alternative, for that matter).
Property is bought and homes are built based to a large degree on zoning, surrounding zoning and the General Land Use Plan. Segment A is in blatent defiance of all of this. At least a portion of the USFS Alternate (including the substation) would be built in an area that is zoned industrial and next to a delapitated old mill site and an area of future industrial related activities (more appropriate).

GP. 41-7

Noise:
Similiar to Segment A

Public Safety and Health:
Impacts would be same or less for the USFS Alternate due to the following:
#1 Probable less vandalism (and related accidental injury or death) of substation near old mill site due to closer police services. Less also for the tap in location of substation for the same reason plus non-public access.
#2 Quicker response times of fire departments - this industrial mill area is designated "mutual aid" by both the rural and city fire departments (the Aspen stated response time of three minutes to the Segment A substation is wrong. A more appropriate response time is 15 - 20 min.)

EMF:
Less EMF's would be emitted on the USFS Alternate due to it's much shorter line length. Substation exposures would be similiar.

Socioeconomics and Public Services:
There would be less impacts on property values on the USFS Alternate as it is 2.3 miles shorter, and it is less visible.

Transportation and Traffic:

-5-

The USFS Alternate would have less impacts than Segment B. Would probably be similiar to Segment A or less (for access, Crowder Flat Road is more heavily used road than Spicer Ln.)

Visual:
The USFS Alternate would have much less visual impacts than Segment A or Segment B.
The USFS Alternate would be fairly well hidden in gently rolling hills as opposed to the skylining effect of Segment A (see photos).
The USFS Alternate and substation at tap in point would be over a ridge from the city of Alturas and would be much less visible than Segment A or B.
Aspen, in their statement "Segment B would result in higher visibility and greater visual impacts to the public due to closer proximity to Alturas." is not actually true (see photos), especially in the case of the USFS Alternate. The USFS Alternate, even though slightly closer to town, would be much more well hidden and blend more appropriately into the environment. It would be less visible from any residence, business, or public gathering place within the city limits of Alturas than Segment A (see photos). It would be less visible from any highway in Modoc County. It would be less visible from the vast majority of residences or view areas from any direction, including the public portion of the wildlife refuge, surrounding recreational lakes, Cedar Pass, roads from Likely, etc.
Skylining of ridgetops does not conform to the Energy Element of the Modoc County General Plan.
See also residential impacts, under land use above.

GP. 41-7

Air Safety:
Even though structures in the USFS Alternate would be closer to the Alturas Airport than those in Segment A, skylining the ridges around the airport (as in Segment A) may also be a detriment. Mitigation of structures located closer to the airport may involve the placement of lights on the top of structures, which may have the cumulative benefit of reducing bird collisions at night or during inclimate weather (not addressed as a form of mitigation in the DEIR).

In summary, the USFS Alturas Alignment was proposed by the US Forest Service as a potential alignment with less impacts. The private property crossed comparing this route and Segment A is approximately equal and yet more than 13,000 feet of public property would be eliminated from the Project. The elimination of impacts on public property with no additional impacts on private property is in every ones best interest.

The presumed course of the USFS Alternate is similiar to that described above, but probably not exact. The above route was independently suggested by a member of the Modoc County Planning Commission and others, although it is unknown whether it has been, to date, formally proposed by others. The "USFS Alternate" name, as used above, is used due to it's close similiarity and simply for lack of a better name and could just as easily be labeled "Segment A1"

-6-

This alternative was proposed in a timely fashion and within the appropriate comment period as dictated by law (Sierra Pacific Power Company seems to have some problem with this). It is a viable alternative and can be shown to have less impacts than Segment A or Segment B. The rational for the USFS Alternate elimination is totaly unfounded, can be easily refuted and demonstrates only a hurried attempt at addressing this realignment (and potentially similiar realignments). The USFS Alternate has not been properly addressed, and if not readdressed in a much more detailed study, could represent a fatal flaw in the Project and a distortion of the CEQA requirements as governed by law. GP. 41-7

Sincerely,

Thomas F. Kraudi
1203 Thomason Ln.
Alturas, CA 96101

-7-

B.3.4 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

As discussed in Section B.3, alternatives were assessed for their ability to reasonably achieve the project objectives and reduce the significant environmental impacts of the Proposed Project. Also, their technical and regulatory feasibility was evaluated. Based on this screening criteria, the following alternatives were eliminated from further consideration:

B.3.4.1 Alternative Route Alignments and Substation Sites

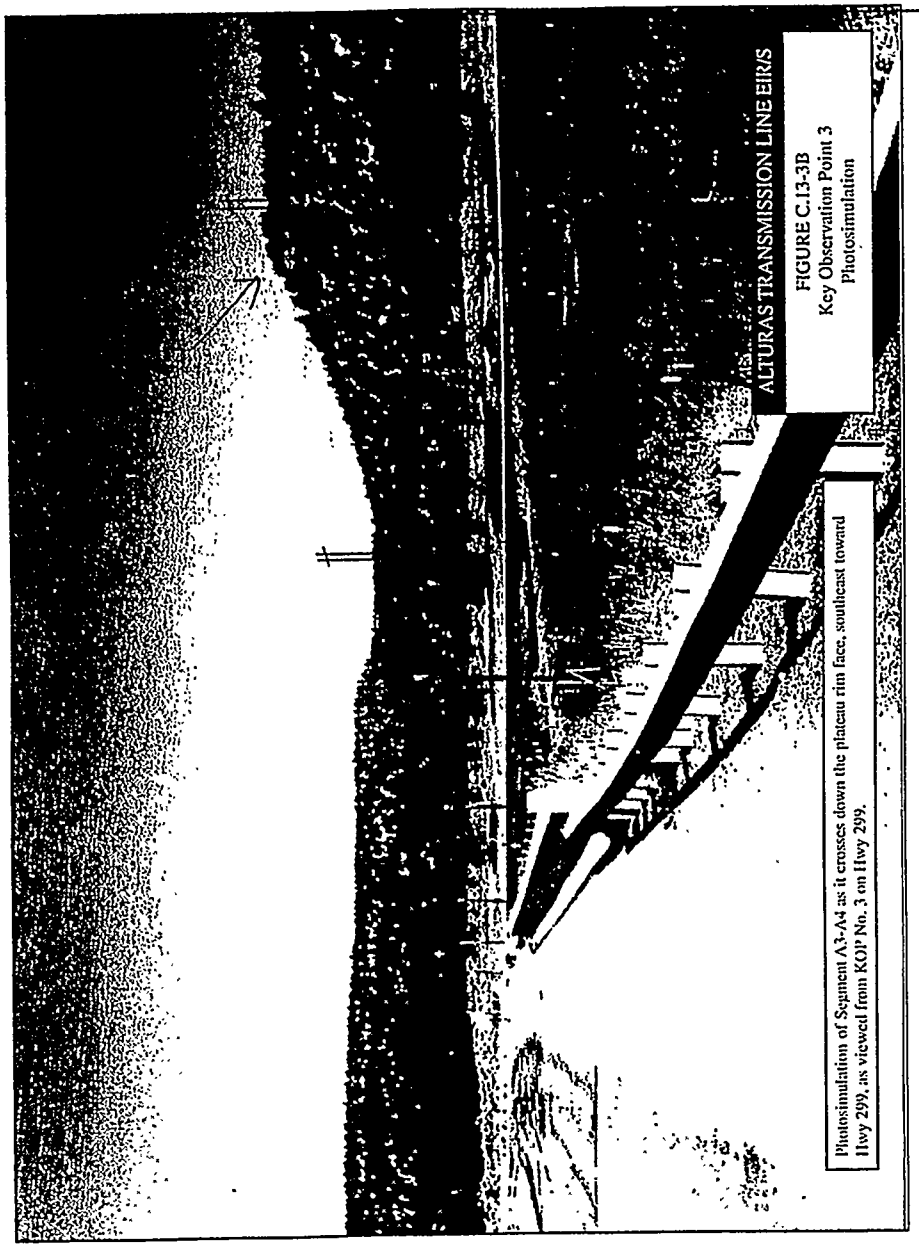
This section discusses the alternative route alignments and substation sites eliminated from further consideration. Alternative route alignments are presented from north to south.

[redacted]

Description. The USFS (USFS, Modoc National Forest, February 10, 1995) recommended evaluation of a route that would replace Segment A of the Proposed Project. This alternative route would follow the existing utility corridor off of the Modoc National Forest and onto private land near Rattlesnake Creek, then southwest to the Alternative Alturas Substation (Mill Site). From the Mill Site, the alternative would be the same as Alternative Segment B (described in Section B.4.1.1). This route was suggested to avoid placing the line on USFS land outside of an existing utility corridor. The USFS indicates that the Forest Land Management Plan directs the placement of new utility facilities within or contiguous to existing corridors and encourages the use of private lands for new corridors. The Forest Land Management Plan also states that construction of new corridors will be considered only if technology, safety, national and state practices, engineering, or environmental quality preclude co-existing uses.

Rationale for Elimination. The suggested route would remain in the established utility corridor across USFS land, but would cross the urban area of Alturas causing significant land use impacts. It is noted that the existing utility corridor is located in an east-west direction, with no provision for north-south lines except in the area within the urban Alturas area. This alternative route is similar to Alternative Segment B which is fully analyzed in Part C of this EIR/S. Alternative Segment B avoids USFS land and appears to comply with the objectives of the USFS regarding use of private land; it would achieve the same purpose as the USFS recommended alternative. Furthermore, Alternative Segment B is better defined at this point in time. Therefore, the USFS alternative was not carried forward for full analysis in this document.

A



The following is photodocumentation of the visual effects of Segment A and the USFS Alternate to Segment A. The predominant and skylined point of Segment A is highlighted with an arrow. This helps to show that the profound visual deteriments of Segment A not only impact the local residences, but also the city of Alturas and a large surrounding area. Even though Segment A is located approximately 1/2 to 3/4 mile further west of Alturas than the USFS Alternate, the visual effects of Segment A would impact a much greater number of viewers. The arrowed point also will serve as a reference for your orientation.

Page A shows Aspens photosimulation of the point to help establish your orientation.

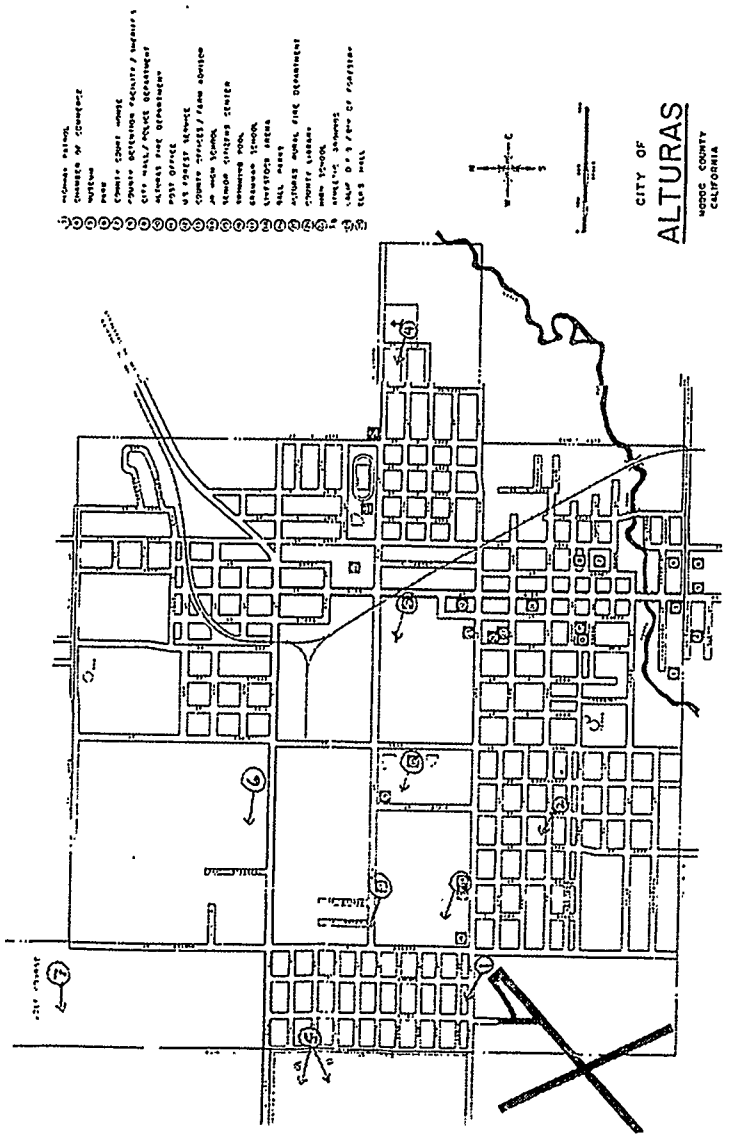
Pages C through H should be used in reference to the City of Alturas map (page B).

Pages J through S should be used in reference to the map on page I.

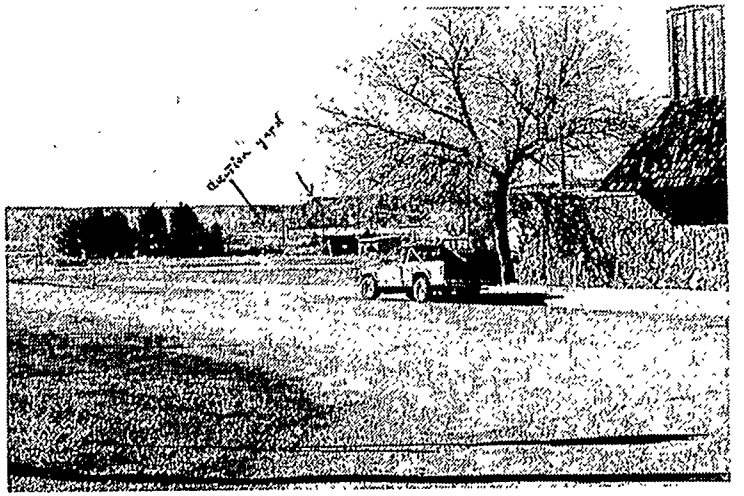
Page T should be used in reference to the USFS map also on page T.

Page U shows a potetial modification of the USFS Alternate and Segment B that may reduce the impacts of the Pit River Crossing.

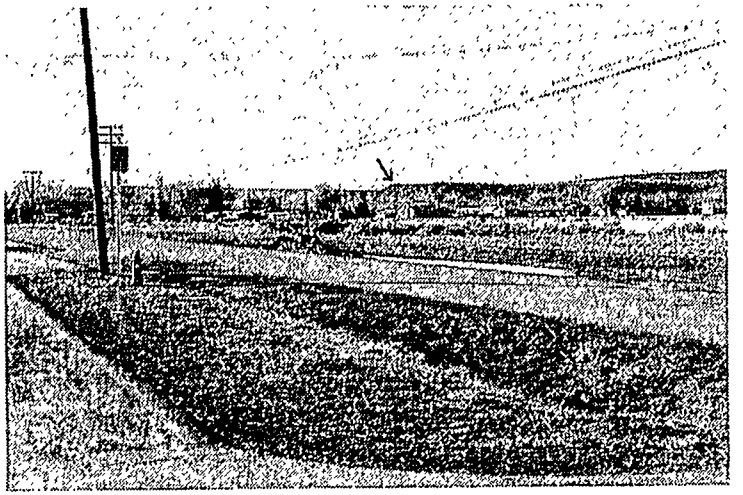
B



C

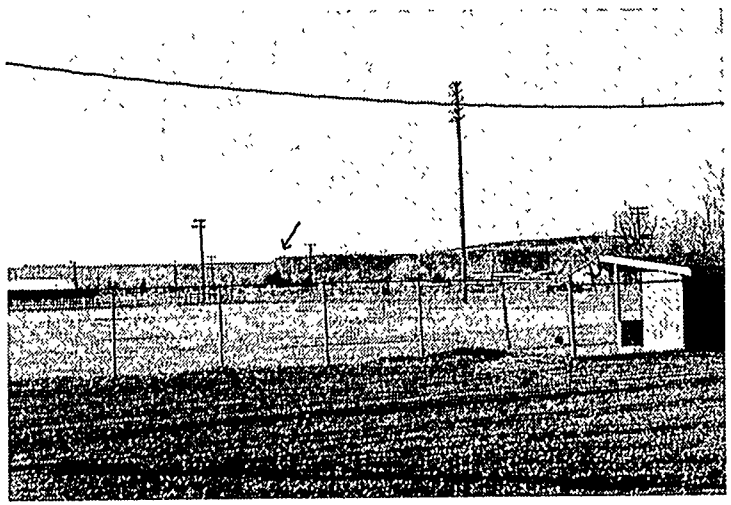


(1) 4th and Warner St.'s
note USFS Alternate would not be seen



(17) Elementary School
note USFS Alternate would not be seen

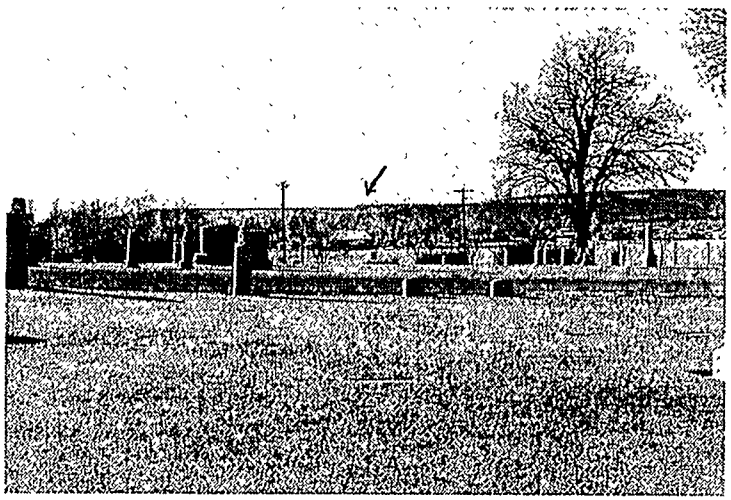
D



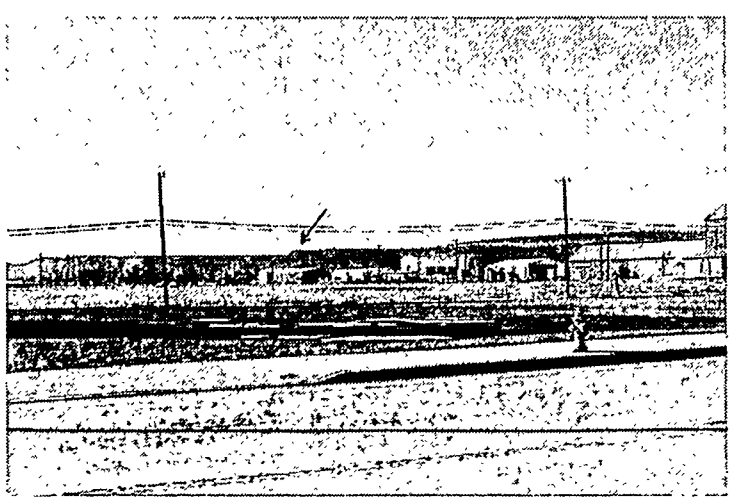
(19) Youth Park
note USFS Alternate would not be seen

(2) typical residence in City of Alturas
note USFS Alternate would not be seen

E

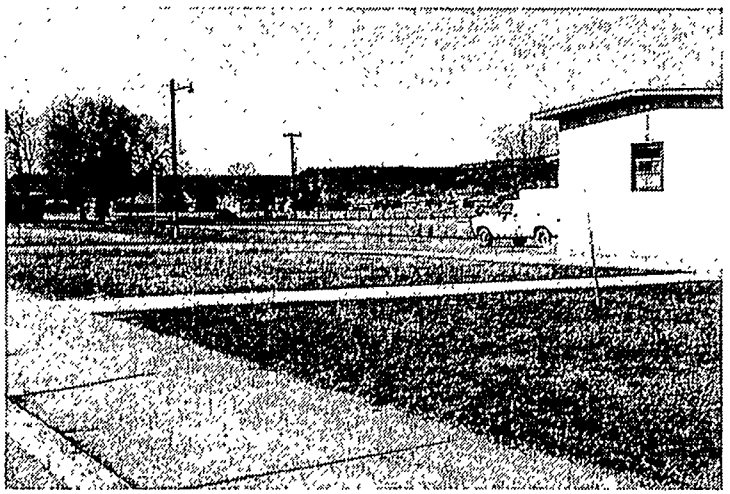


(4) City of Alturas Cemetary - located on far eastern edge of Alturas
note USFS Alternative would not be seen



(25) Main St. - across from Elks Lodge (old train depot)
note USFS Alternate would not be seen

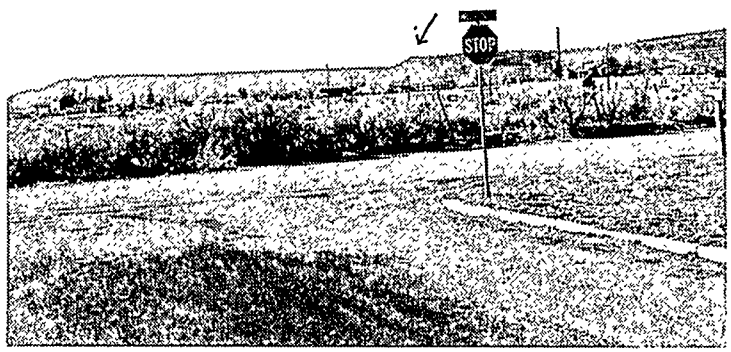
H



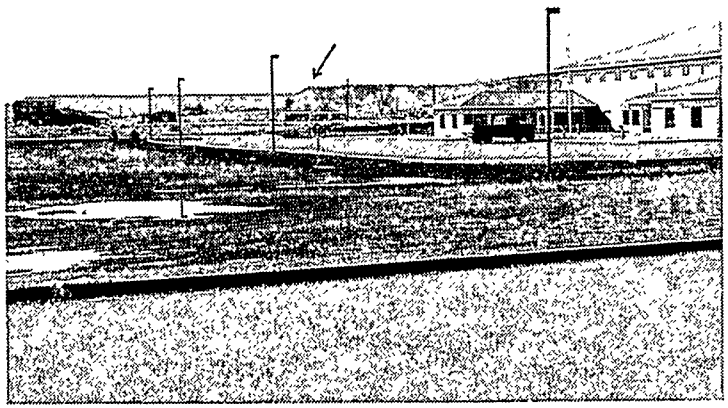
(14) Modoc Middle School (Sr. High School)
note USFS Alternate would not be seen

F

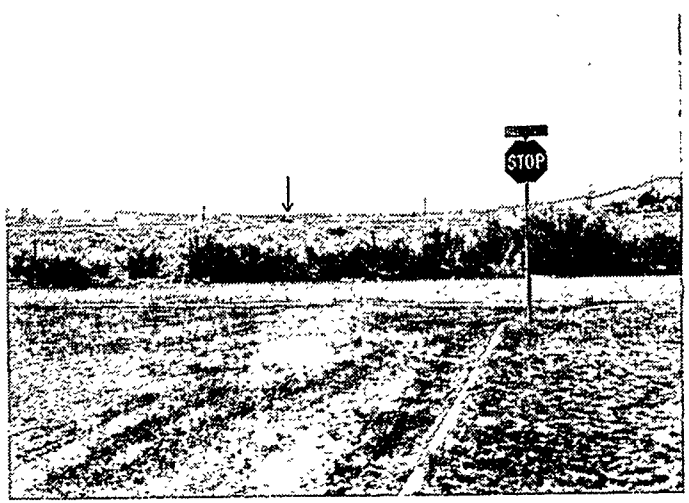
G



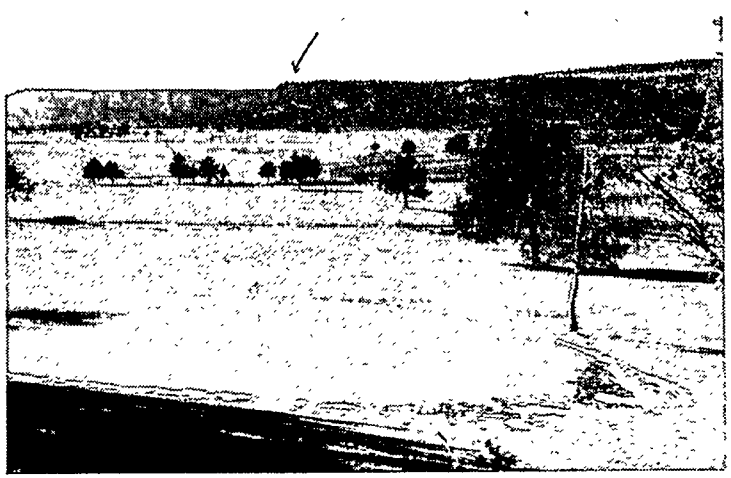
(5a) from Mill and 10th St.
note USFS Alternate would not be seen



(6) from USFS & BLM offices on 12th St
note USFS Alternate would not be seen

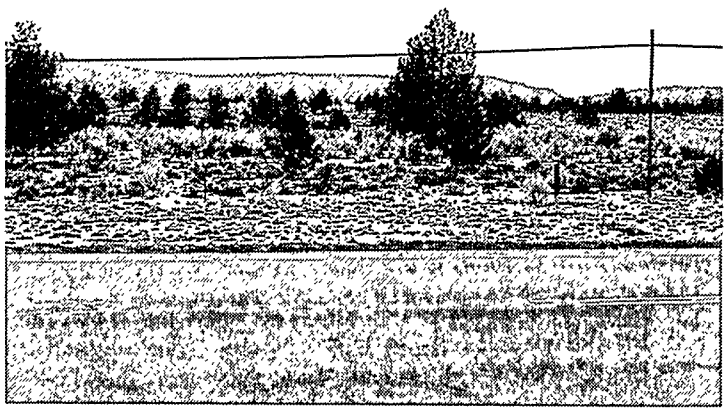


(5b) from Mill and 10th St
Mill Site substation would be approx Twice as far away as arrowed old Industrial storage shed (and in line with it) That is arrowed



(7) from club house on City golf course

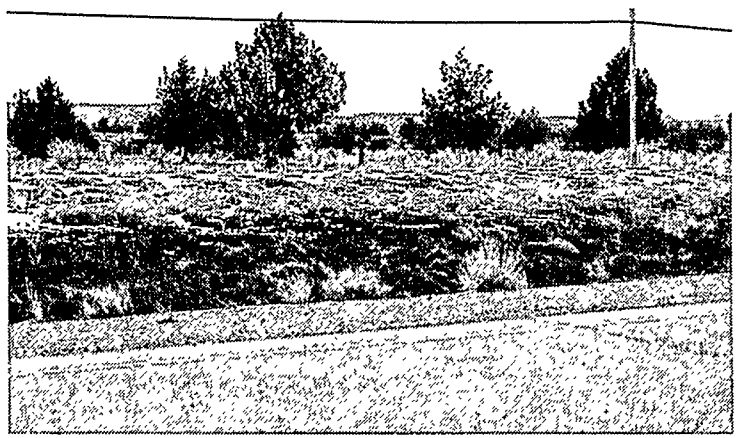
J



① USFS Alternate - looking north from crossing of Hwy 299 - note how rolling hills would break up contrast of a straight line

② from Hwy 299 - across from Auction Yard segment A would be easily visible in skyline USFS Alternate would be approx. 650 ft. from where photo was taken and visually broken by topography

K

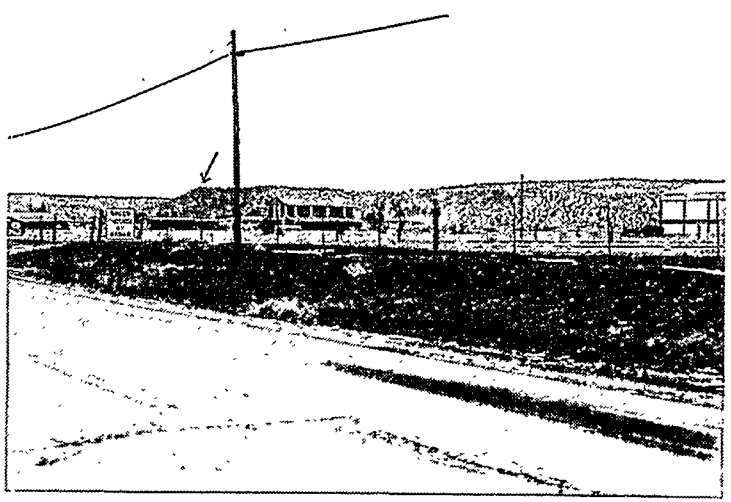


③ from Hwy 299 - looking north and slightly east at USFS Alternative

④ from Hwy 299 - looking north east toward USFS Alternate - note gently rolling hills

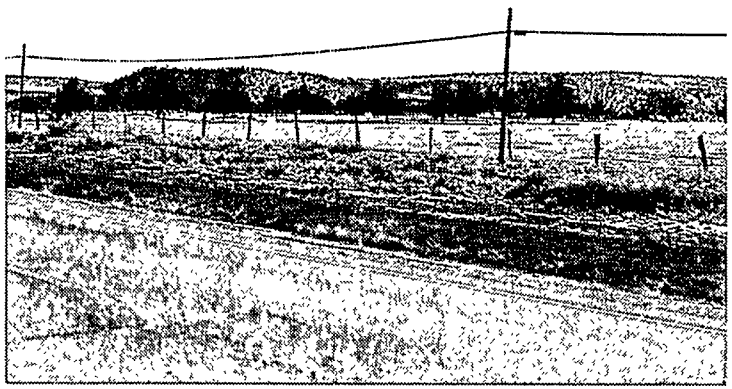
L

(5) Hwy 299 just west of Rattlesnake Cr.

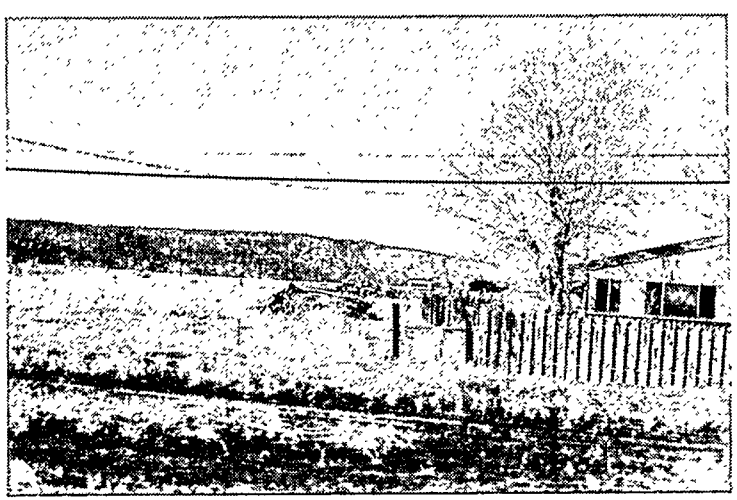


(6) from Hwy 299 a few hundred yards east of Spruce Cr.
note USFS Alternative not visible but Segment 4 very visible

M

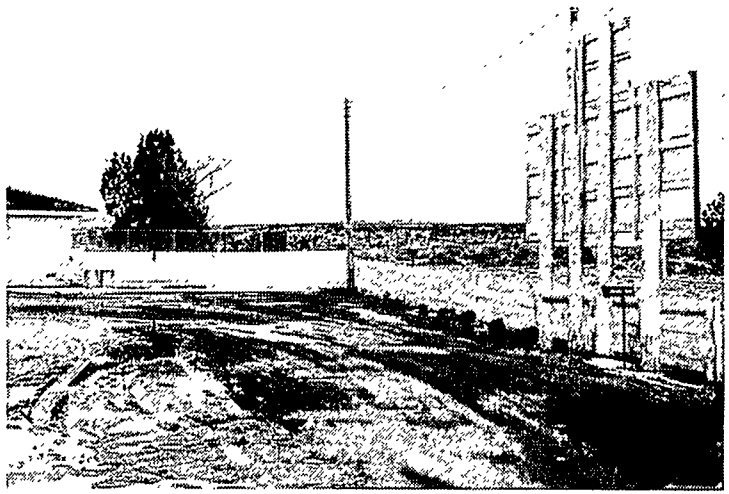


(7) from Hwy 299 - looking west and slightly north
note gentle hills obstruct view of USFS Alternative

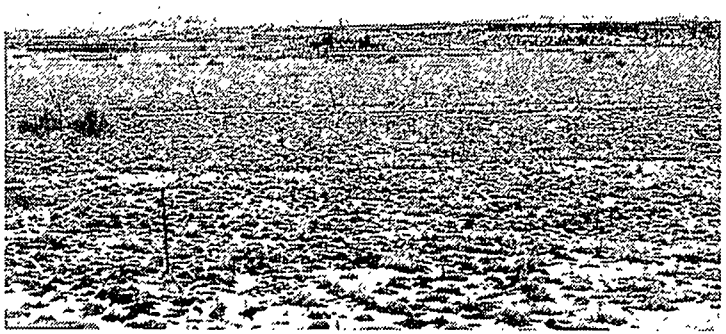


(8) Hwy 299 - looking north and slightly west
note gentle hill prevents view of USFS Alternative

N

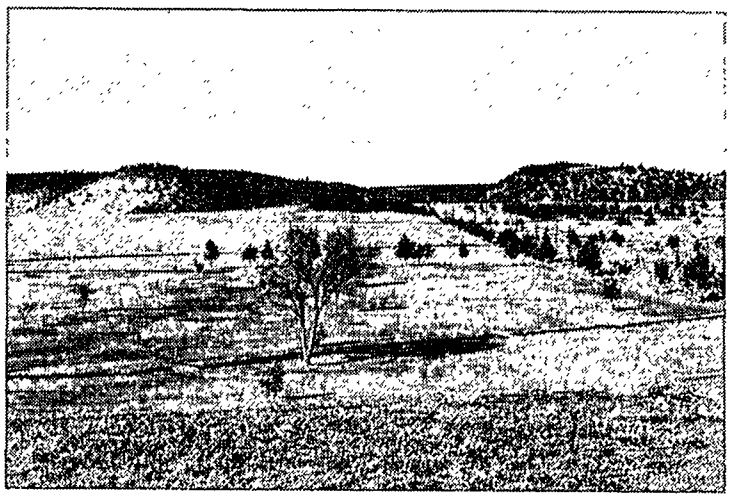


(9) Hwy 299 looking south across Hwy 299 from Auction Yard



(10) old mill site - looking south from Hwy. 299
mill site substation would be at far right edge of photo - next to existing wooden power poles - line comes out of rolling hills (slightly west) to here

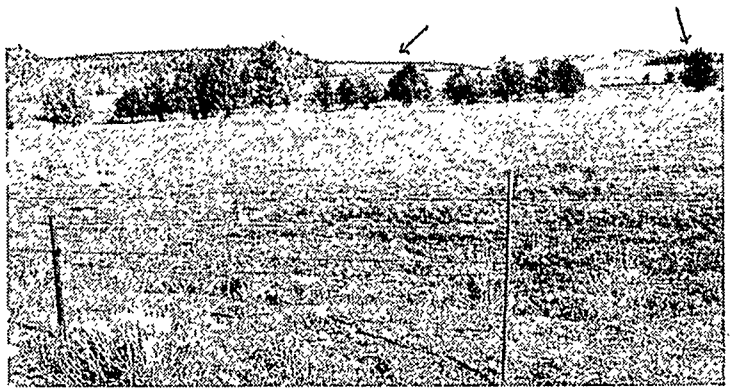
O



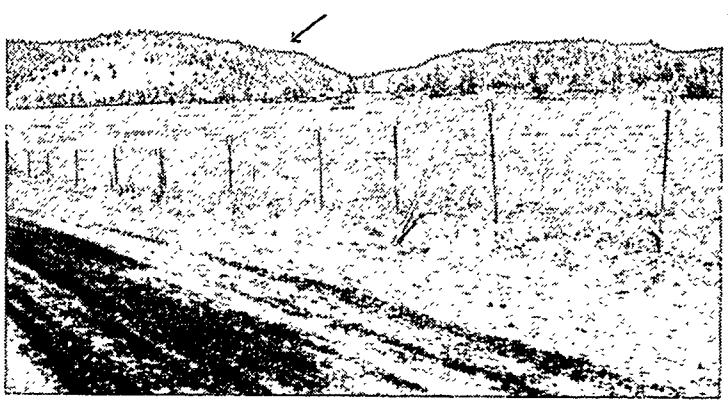
(11A) from club house of City of Alturas Golf Course looking north - note existing BPA line (230KV line) USFS Alternate tap in and possible substation would be on other side of juniper covered knob
- note substation and line would not be seen
- note lack of residences and total invisible view from Alturas

(11B) from club house of City of Alturas Golf Course looking north west
USFS Alternative would not be visible

P

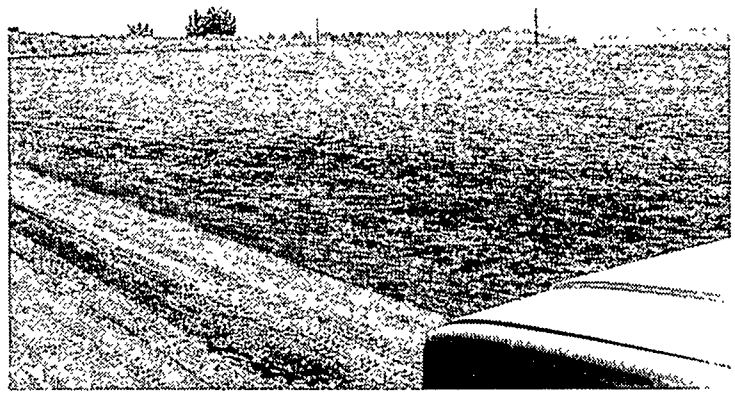


(13) USFS Alternate - looking east and slightly north to tap in and possible substation site
- note existing 230kv BPA line (arrow)
- note juniper covered knob (arrow) - reference point



(13) USFS Alternate - looking northeast
note where existing BPA line drops off rim (arrow)

Q

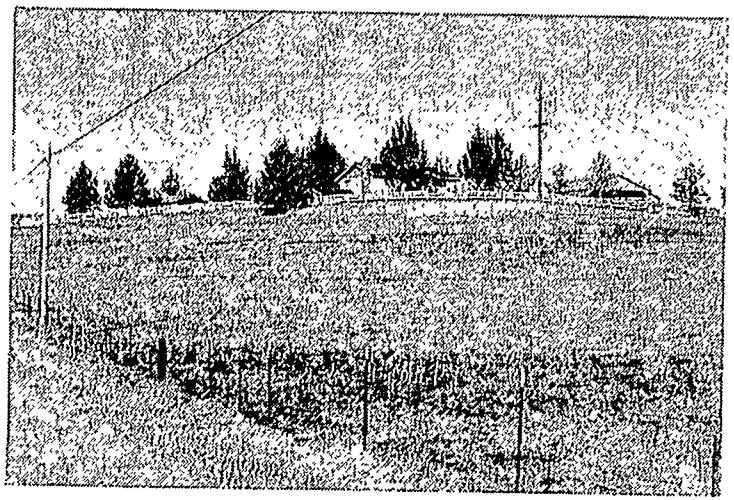


(14) USFS Alternative - looking to south west

(15) looking south towards closest residence at USFS Alternative north of Hwy 299

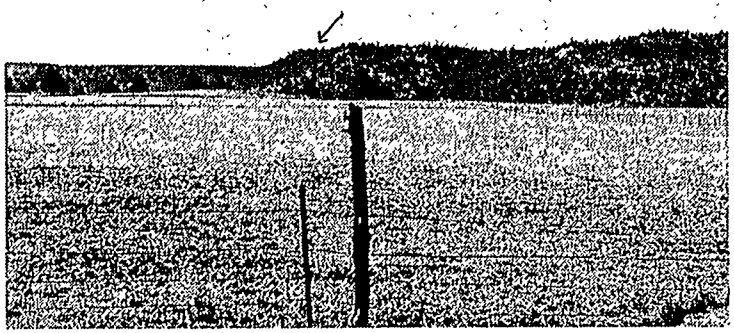
R

(15A) looking south east toward residence > 2,000ft that would be completely screened by trees and topography



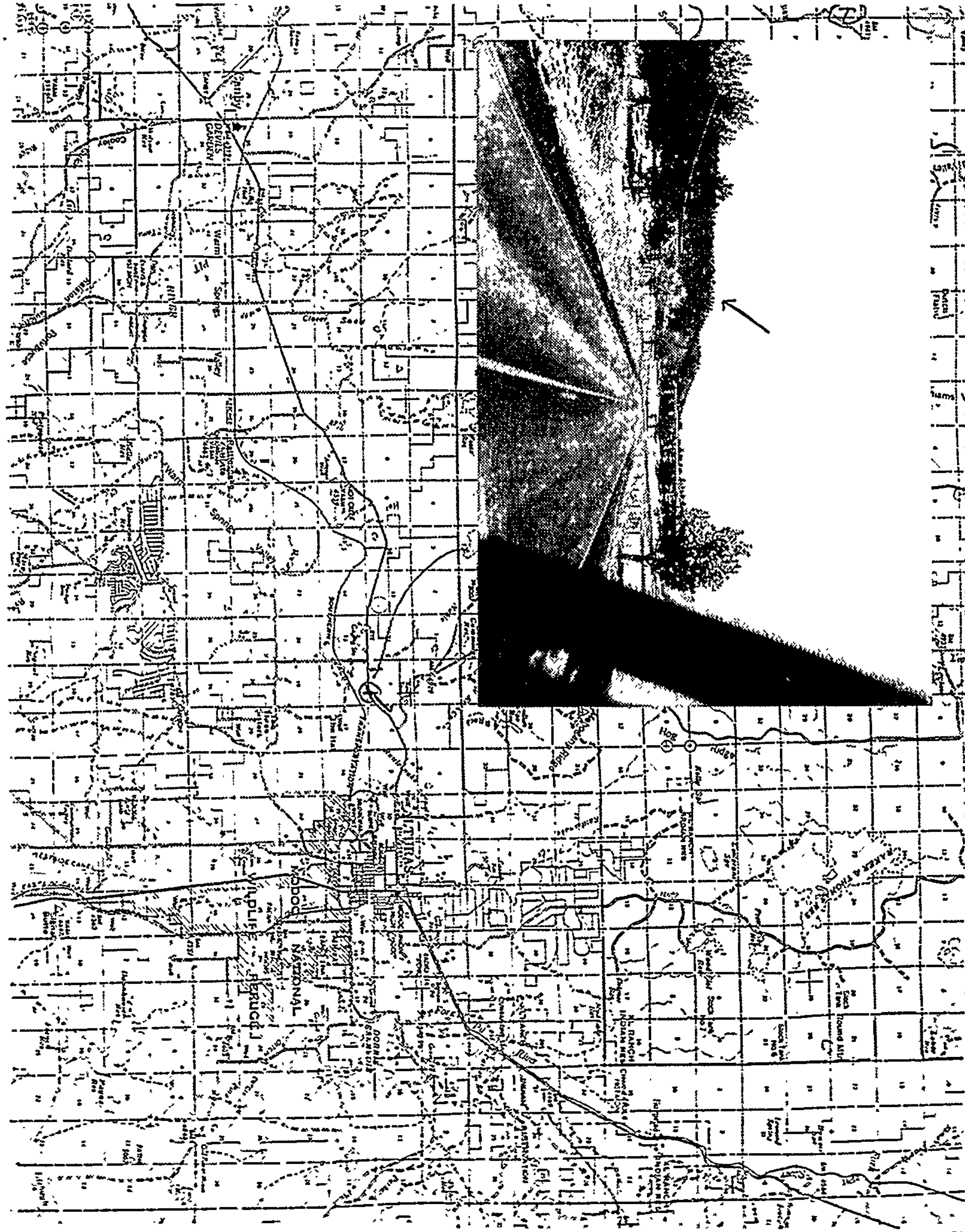
(16) looking north at residence noted in (15)
- note orientation (home faces SE - away from line)

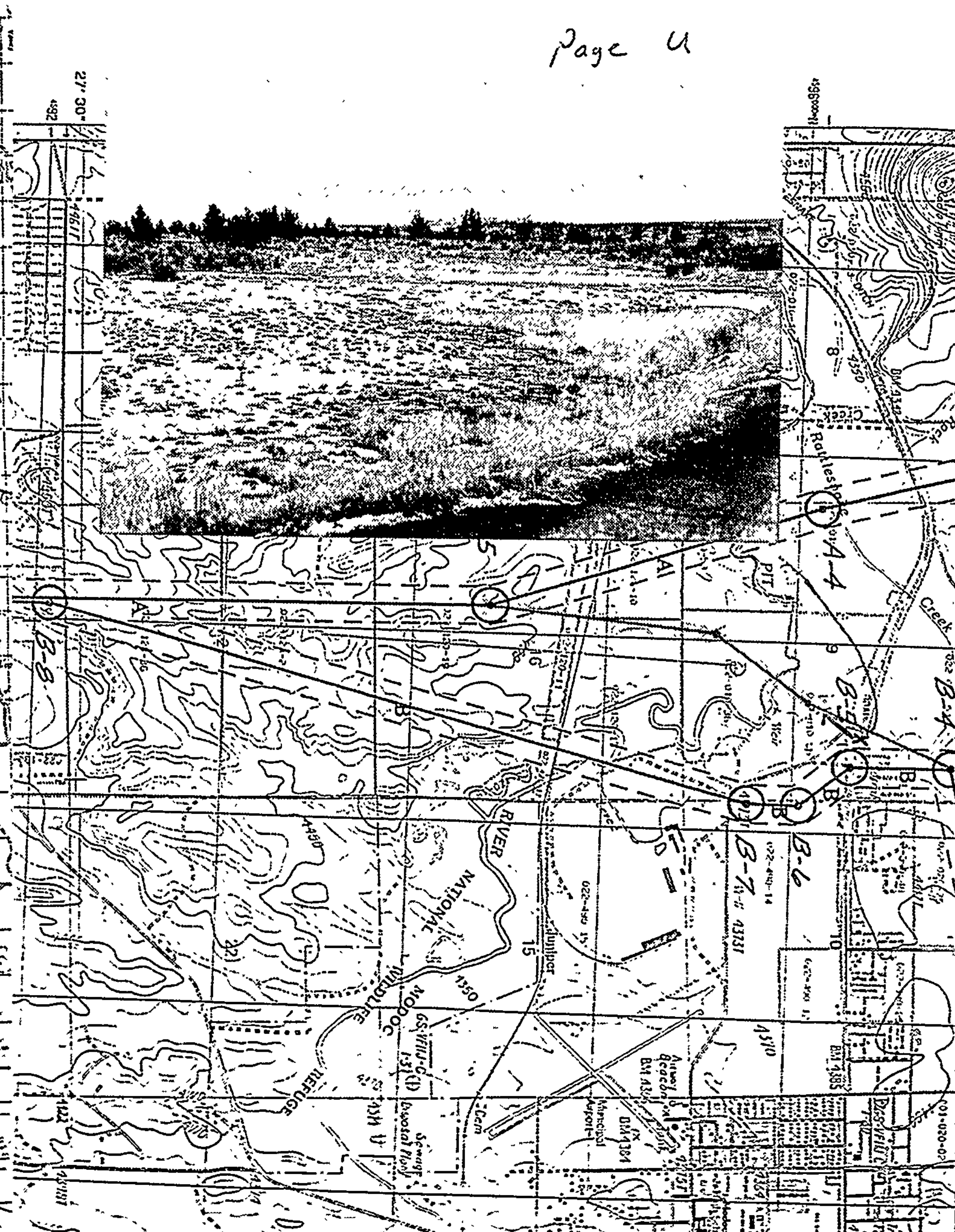
S



(17) from Spicer Ln. - looking west
- note USFS Alternative would be well hidden to invisible while segment A would be very visible

Page U





RECEIVED MAY 1 0 1995

5/5/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC # 93-11-1-018
BLM # CACA-31406

Dear Julie / Peter,

Alternatives in relation to this Project have not properly been encouraged, identified, or studied.

Roger Olack, Sierra Pacific's Project Mananger, reassured the concerned public at Sierra Pacific's February 28, 1994 "open house" that the proposed alignments would not necessarily be the final alignment. He stated that upon acceptance of Sierra's application for the Project, realignments would then be "out of Sierra's hands", but the disinterested third party (Aspen) would identify sensitive areas of concern and realignments around these areas would be probable. This statement is reasonable in that the disinterested third party (Aspen) is assumed unbiased and has the resources to determine alternatives in sensitive areas. Even though areas were identified during the scoping process as being sensitive (eg. area west of Alturas and Long Valley in Sierra County), the DEIR made no independent attempt to identify alternative alignments.

In addition to alternatives not being provided for areas identified as being sensitive during the scoping process, alternatives were also not encouraged. The CPUC only clearly encouraged alternatives from the public up to May 27, 1994 (see attachment A). Even though NEPA states that the scoping process is continuous, the public was not made aware of this and it was implied that no further comments would be accepted past May 27, 1994 until the comment period reopened for the DEIR. During the comment period for the DEIR, only comments on the DEIR were encouraged. There was no encouragement of alternatives.

On page D-13 of Aspens EIR/S Proposal for the Project, Aspen suggested the possibility of "Advisory Committees" that would integrate the public into the process of exploring alternatives. This, however was not carried out and there were no other methods used to help encourage alternatives. The "workshop", which apparently was used to take the place of "advisory committees", was offered only to "answer questions about the Project". It made no attempt to encourage alternatives.

GP. 41-8

Still in addition to the above, alternatives were actually discouraged by Sierra Pacific during the DEIR comment period by stating that it was too late in the process and that Sierra Pacific would resist alternatives outside of their 660 foot study corridor.

Due to the large volumn of public concern relative to the population of the area, I would suggest that the lead agencies and Aspen take the time to properly explore alternatives. To date, it has not been done.

GP. 41-8

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED MAY 10 1995

5/5/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Dear Julie / Peter,

During the Alturas scoping meeting of May 18,1994, it was asked that the reliability of BPA as a source be examined. This was not done in any depth in the DEIR. Recent salmon mitigation of the Columbia River makes BPA power a potentially unreliable source. Since reliability is the main driving force of this Project, an in depth analysis of the future affects of salmon mitigation should be included in this document - otherwise objectives may never be achieved. GP. 41-9

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED MAY 10 1995

5/5/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC # 93-11-018
BLM #CACA-31406

Dear Julie / Peter,

April 14, 1995 the Modoc County Planning Commission voted unanimously to oppose Segment A and Segment B of the Project. The Planning Commission recognized at this meeting that this Project would eventually attract other similiar projects and serve to create a new utility corridor. They recognized that other alternatives for this area, with less environmental impacts, were obviously not studied or addressed in the DEIR. The Planning Commission stated that other realignments for this area with less visual, biological and probable overall impacts were available. At the March 8, 1995 Modoc County Planning Commission meeting, several logical realignments were discussed.

In Chapter 5 (Preparing Environmental Impact Statements) of the NEPA Handbook, it states "A range of alternatives is initially formulated during scoping and is refined throughout the EIS process. New alternatives can and should be developed and defined as the need arises during preparation of the EIS." Since scoping is an ongoing process, and Segments A and B are unacceptable routes, I would like to request that other routes be seriously investigated. GP. 41-10

If alternates can not be found in the near future that have less impacts than Segments A or B, some active form of alternate route solicitation, combined with the resources and objectivity of Aspen, should be implemented. The "Advisory Committees", as described on page D-13 of Aspens EIR/S Proposal to the CPUC should be implemented.

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED MAY 10 1995

5/5/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC # A93-11-018
BLM # CACA-31406

Dear Julie / Peter,

I feel that the visual aspects of the Project on the northern portion of Daggert Canyon were not completely or appropriately addressed.

On page C.13-32, second paragraph, of the DEIR it is stated that Segment HS01-ANP2 would have "no significant visual impacts". This statement is based entirely on the presumed "small number of visitors to the area". This is in error based on the following facts:

#1 There is an established bike route that goes to Daggert Canyon (the box canyon). Please see the highlighted area of the enclosed pamphlet which was on display at the Alturas BLM office. This is a documented and promoted path. An EA for this bike route was completed and signed by Rich Burns, district manager of the Alturas BLM office. This Project, with current routing, would present a Class I unmitigable impact as it would be in the forground of the view shed of the box canyon and bike route. This was not addressed in the DEIR.

#2 The box canyon is a relatively popular end point of scenic drives and walks of local people. It is an area of peculiar interest that is close to Alturas. It holds future potential for increased visitor numbers and this was not addressed in the DEIR.

#3 Visitor numbers alone do not determine it's visual significance as implied and stated in the DEIR for this area. If this rational were true, we should built our industrial structures in the remote corners of our wildernesses.

#4 On page C.6-31 of the DEIR, it states (under geology) that "Impacts of the Proposed Project on the geologic environment would be considered significant if ... Unique geologic features or geologic features of unusual scientific value for study or interpretation would be disturbed or otherwise adversely affected by the transmission line and consequent construction acitvities." This certainly pertains to the canyons at the north end of Daggert Canyon as they are very peculiar to the area and are being impacted. The peculiar nature of these canyons, combined with the closeness to Alturas, are visual attributes that should not be unnecessarily impacted by this Project. The visual impacts on these canyons would be Class I impacts and the consequent disturbance of these unique geologic features would be a Class I impact that is unmitigable.

GP. 41-11

#5 Mitigation that was not discussed in the DEIR was realignment around this sensitive area. Realignment could be easily achieved to avoid this area and would have less overall impacts. Realignment routes have been addressed in separate letters to you.

GP. 41-11

The third paragraph of page C.13-32 of the DEIR discusses the Segment from ANP2 and around AO3 and again suggests it's insignificance due to low viewer numbers. The above arguments again pertain. This area was only addressed as if viewed from miles away and was not addressed in the DEIR in terms of it's more direct visual effects, such as the view from the box canyon, or the view from the east lava flow subcanyon (that the route crosses). The visual significance of the east subcanyon of Daggert Canyon (deep lava flow canyon) was not addressed. Where the Project crosses this canyon has significant visual merit. It is recognized as a visually sensitive area, and yet this was not discussed in the DEIR (please talk to the Modoc National Forest regarding the visual significance of this area, which was apparently overlooked).

GP. 41-12

Two other points should also be addressed and mitigated:

#1 The Crowder Flat Road is heavily used as a walking trail. I know, because I live by it and see it's frequent use. People walk this road due to it's physical challange and view. This Project would heavily impact this popular walking route, and would be very visible crossing the flat plateau south of AO3. This again lends to the significance of this segment and should be addressed and mitigated in the EIS.

GP. 41-13

#2 It should also be noted that my family's home ("private residence in Daggert Canyon") is higher and closer than KOP #2 to AO3 and, therefore, the visual impacts would not be similiar - but worse. This would result in a cumulative impact to my view, adding to the severe visual impact of skylining the point just north of Hwy 299, and acting as a reminder that the once pristine Daggert Canyon is almost totally bracketed by industrial power lines. The view from every window in my newly constructed home will be heavily impacted. I consider this to be very significant and request that you please address language in the EIR that reflects this true impact. Unfortunately, due to our peculiar Modoc tastes and values, I feel my families lives will be impacted and changed forever.

GP. 41-14

Sincerely,

Thomas I. Kraucl
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED MAY 1 0 1995

5/6/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC # 93-11-018
BLM # CACA-31406

Dear Julie / Peter,

Sierra Pacific called me the other day to advise me that a survey crew, headed by Paul Pace, would be on my property along with a team of biologists, headed by Patricia Mosley, for a few days. Today, a helicopter has been working the area with the survey team, and as I watch them out my window, I can't help but wonder how the biologists can expect to collect any data other than botanical data. If wildlife studies were done during this period, obviously the survey crew would lessen their findings. This concern was expressed in a letter to you May of 1994 (enclosed - copy of original can be provided) and has yet to be addressed. GP. 41-15

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

4/6/95

Julie Halligan
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

RE: Alturas Intertie
CPUC # A93-11-018

Dear Julie,

The DEIR addressed some, but not all of the concerns expressed regarding the two northern subcanyons of Daggert Canyon, located north of Hwy 299. For example, specific raptor and visual studies were lacking, even though these were addressed as very specific concerns during the scoping process. Appropriate mitigation was also not sufficient in regards to this area, as very minor route realignments may offer the best form of mitigation in avoiding this sensitive area.

In an effort to reduce the impacts of the Project on the north end of Daggert Canyon (and overall impacts of the Project), please consider the following mitigation:

#1 minor route realignment as shown on the enclosed map
#2 reduction of pole structure hieght to 70 ft. on Segment A. north of Hwy 299
#3 complete rehabilitation of all access roads north of Hwy 299

GP. 41-16

Daggert Canyon narrows into two subcanyons at the northern end. The west subcanyon is a spectacular steep walled box canyon with a seasonal waterfall (Rock Creek). The BLM currently has plans for a bike route to this subcanyon. The proposed Alturas Intertie crosses just to the north of this beautiful subcanyon and well within the subcanyons view shed. The eastern subcanyon is a deep lava canyon in a completely roadless area, also with a seasonal creek through it. The proposed route crosses over the most spectacular portion of this subcanyon. Both subcanyons are areas of concern regarding raptor habitat. Both subcanyons represent a transition or "edge" from the relatively flat Devils Garden Plateau to the low lands below. The minor route realignment shown would help to avoid these sensitive areas. This minor realignment would:

#1 Remove the Project from some of the view shed of these subcanyons. The visual aspects of these subcanyons, I feel, were not properly addressed by Aspen as only general maps were apparently used to determine the visual rating. Also, viewer numbers were a major cause for a lower rating. The visual significance of these subcanyons is real and is understood and appreciated by the U.S. Forest Service, BLM, the citizens and government of Modoc County. These subcanyons are a visual asset due to their close proximity to Alturas and potential for increased viewer numbers. The minor northward alignment of the Proposed Project above the western subcanyon (box canyon) is evidence of BLM visual concerns regarding this

area. Sierra Pacific's attempt (at BLM's request) to avoid the box canyon, however, is feable and Aspen did little to mitigate the routing of this area. Aspen recognized the severe visual impacts of this area by suggesting the mitigation of lower pole structure heights, but the more appropriate mitigation would be simply to avoid this area as much as possible.

#2 Reduce the wildlife impacts in this area. By avoiding the canyons and lips of the rims there would probably be less impacts on:

A. deer - which like to bed down under the rims
- This is a heavily used deer wintering area, which means it is not only important to the deer, but also associated predators and scavengers. The majority of lower Daggert Can. is owned by Krauel (490 acres) and has not been grazed(for the last several years) and will not be grazed. Under the guidance of several wildlife biologists (contact Dave Johnson, USFWS, Modoc National Wildlife Refuge), the area is being slowly rehabilitated to increase the wintering habitat, thus increasing the importance and peculiar nature of the area. This was expressed as a concern during the scoping process, and rehabilitated areas were documented in a video tape sent to you May, 1994.
THIS WAS NOT ADDRESSED IN THE DEIR.

B. raptors - also addressed as a concern during the scoping process. Removing the line as far away as possible from the canyon lips and avoiding crossing the east subcanyon would probably help reduce raptor impacts.

C. waterfowl - addressed as a concern Nov. 1994 as heavy waterfowl flights were documented the first few weeks of November descending into Daggert Canyon from the north. These flights were primarily at night and during the stormy first few weeks of November. THIS CONCERN WAS NOT DIRECTLY ADDRESSED IN THE DEIR (but admitedly was not recognized and submitted as a specific concern until well past the Nov 27, 1994 scoping "deadline"). Moving the line away from the lips of the canyon, however, may help reduce the potential for waterfowl collisions. Orange line markers would not be appropriate for nighttime migrations / flights.
Note, also, low altitude geese flying in a north to south direction is well documented in the above mentioned video.

D. land use - BLM recreation planned bike route would be more appropriately avoided. A bike route is a very compatable, well thought out project, as it is a summer activity and would have very little impact on the sensitive winter habitat.

Reduced pole structure hieght is appropriately recommended as a form of mitigation for this area in the DEIR. This would:

#1 Help reduce visual impacts by decreasing, somewhat, the skylining effect, and thus reducing the presence of the Project in the view sheds of the above mentioned subcanyons and surrounding areas.

#2 Reduce bird collisions that may occur at nighttime or during inclimate weather.

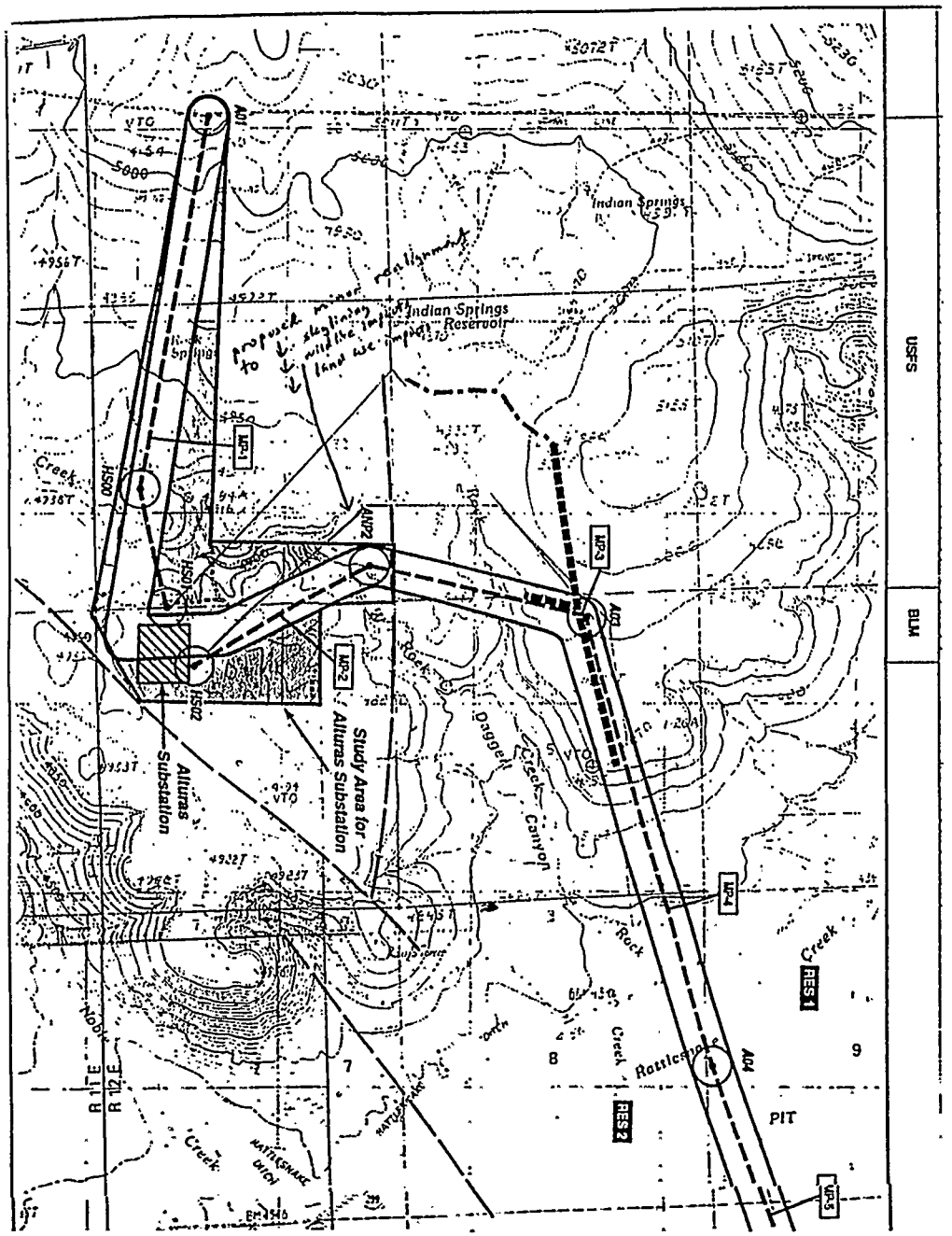
I am highly opposed to permanent access roads as proposed near Angle Point 3. This is a roadless and relatively roadless area. It is an area of significant deer and antelope habitat. It is also in, or near, a visual retention area of the USFS. Development of a permanent access road such as this would compound the visual impacts and this cumulative effect was NOT ADDRESSED IN THE DEIR. A permanent road, as proposed, may severely impact the wildlife in this sensitive area as public access would be opened up to an area that is now roadless. Access, such as this could impact raptor habitat as well as deer and antelope habitat. This is an area of native populations and of pristine, untouched nature. Gating, or placing rocks, etc. at the entrance of these roads, would not alleviate the problem as, due to the topography of the area, this may easily be driven around by four wheel drives, ATV's or motorcycles. Efforts to obstruct the entrance of these roads may actually compound the impacts. I believe, that due to the sensitive nature of this area, all roads and trails should be completely rehabilitated.

Please consider the above mentioned mitigation. It is logical, timely, and would reduce the overall impacts of the Project.

Thomas E. Krauel
1203 Thomason Ln.
Alturas, CA 96101

GP. 41-16

GP. 41-16



RECEIVED APR 2 4 1995

4/22/95

Julie Halligan
CPUC
505 Van Ness Ave.
San Fransisco, CA 94102

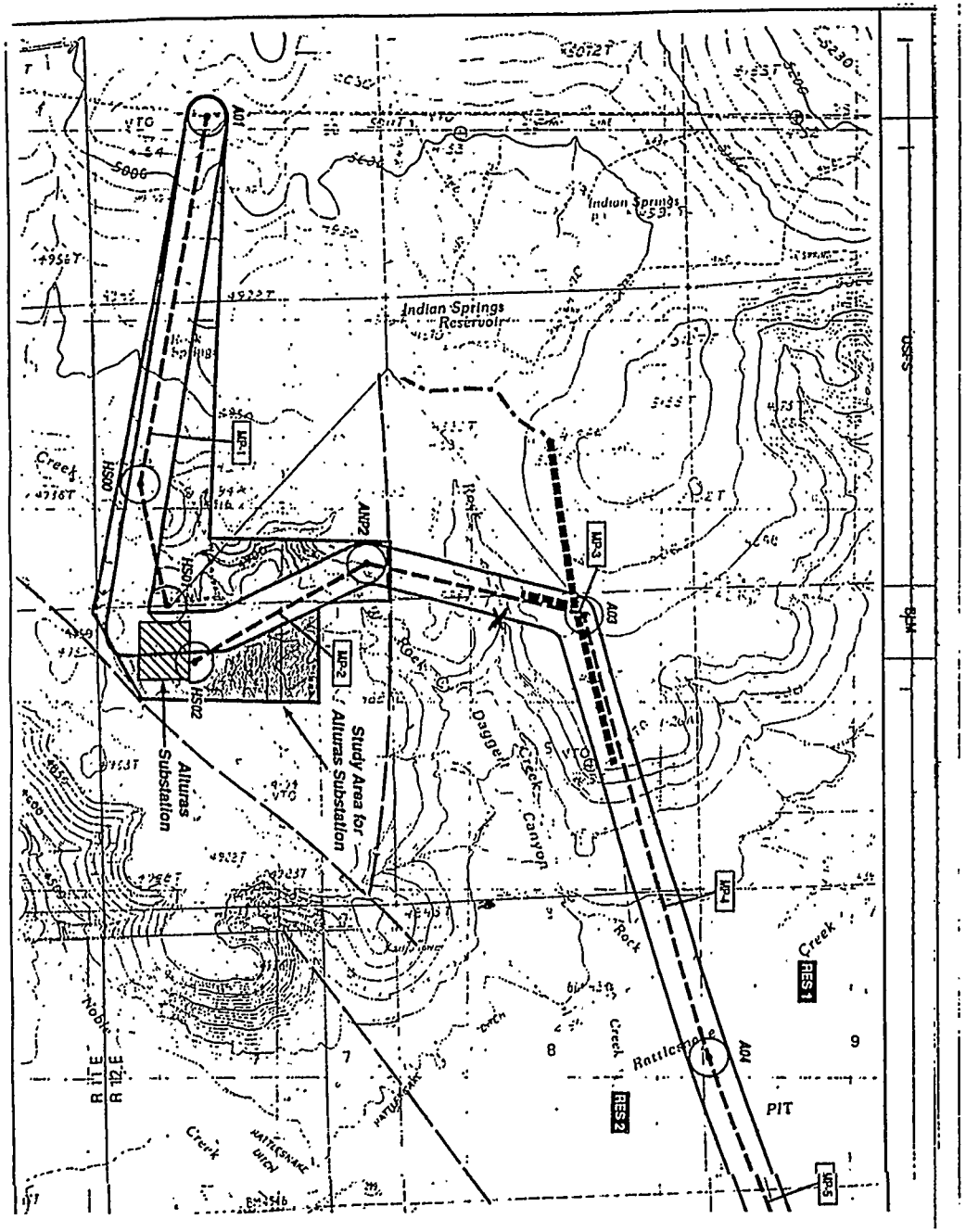
RE: Alturas Intertie
CPUC # A 93-11-018

Dear Julie,

Please make sure the marked cultural areas have been documented by Aspen. The yellow areas are areas of very significant scatter of arrowheads and stones. The blue X is approximately where the old mine shaft is. I have no idea of the significance or history of this. GP. 41-17

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101



RECEIVED MAY 1 1 1995

5/6/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC # 93-11-018
BLM # CACA-31406

Dear Julie / Peter,

During the scoping process I asked that you address the issue of utility corridors. There are insufficient studies to warrent a new utility corridor being created where the Project is proposed to be routed in Modoc County. The DEIR did not address my concern or the cumulative long term effects of creating a new utility corridor. GP, 41-18

Sincerely,

Thomas J. Kranel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED MAY 16 1995

5/15/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Dear Julie / Peter,

The Peregrine Falcon habitat of Daggert Canyon was not addressed in the DEIR. As Daggert Canyon represents suitable habitat for the Peregrine Falcon, and I have seen Peregrine Falcons in the northern subcanyons of Daggert Canyon and even relayed one such siting to you, I do not understand why this potentially significant impact is being ignored. GP. 41-19

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

5/21/95

Julie Halligan/Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RECEIVED MAY 24 1995

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Dear Julie / Peter,

In the DEIR, acres of compensation for the temporary loss of plant communities and wildlife habitat is calculated using the formula:
Ac = (Ai x Pi x Y)/Tc
Ac = acres of compensation
Ai = acres of impact
Pi = period of impact
Y = habitat yield
Tc = period of compensation

For this project, 50 years is used as the Tc, but 15 years is used as the Pi. As in most areas of this Project, due to the high, dry, fragile environment, it cannot be guaranteed that impacted areas will be completely restored. If complete restoration were possible in 15 years, your formula would make sense as Ac would compensate for loss of habitat due to the lag time until complete restoration were complete. In all probability, however, impacted areas will never be completely restored to their pre-impacted levels. You are implying that over a period of 15 years, the overall average habitat that would be intact would be 70%, and at the end of 15 years the disturbed area would be back to it's original state. In these dry areas of the Modoc Plateau, where the Project is proposed, this is highly unlikely. It can be argued, therefore, that Pi should more closely equal Tc. Pi may even exceed 50 years. Ac would, therefore, be in error. GP. 41-20

A compensation ratio (Cr) of .9 is used only in a few, specified types of habitat and ignores the cumulative impacts of a now fragmented habitat and, therefore, does not satisfactorily compensate.

Please review your calculations, this time taking into consideration the dry, rocky fragile environment that the Modoc Plateau consists of.

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED JUN 05 1995

5/30/95

Julie Halligan / Peter Humm
CPUC / BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC # 93-11-018
BLM # CACA-31406

Dear Julie / Peter,

On page C.5-3 of the DEIR it state that the Western Regional Corridor Study of 1992 designated the general Proposed Project alignment as a future utility corridor.

This is wrong. Sierra Pacific's proposed route was not indicated as a proposed corridor. According to the Western Regional Corridor Study there is no existing corridor, proposed corridor, agency designated corridor or any other corridor present or proposed that even comes close to Sierra Pacific's proposed route through Modoc County. GP. 41-26

Please review the Western Regional Corridor Study Maps (Northern California) and correct your error. Please call special attention to this error as the implication that existing corridors are being used is a critical mistake.

This Proposed Project should not be constructed. Part of the reason why, is because this fragile Modoc region has not been studied in terms of creating a new utility corridor. Future projects, even though not currently planned, will impact this area in a detrimental way.

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED JUN 05 1995

5/30/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Dear Julie / Peter,

There is no in depth study of the source of power for this Project in the DEIR even though I asked this to be done during the scoping process.

The recent salmon recovery plan in regards to the Columbia River and it's tributaries was briefly mentioned, but was not addressed. Not only would this plan possibly reduce the probability of continued low cost power from the BPA (one of Sierra Pacific's primary objectives), but it could reduce the amount of power available during Spring and Summer (when Sierra Pacific expects power to be available). The recently proposed salmon recovery plan would impact available power by mandating that water be spilled over the dam during the Spring and Summer months, rather then run the water through the power generating turbines, as 50 - 90% of the smolt are killed by the turbines. The effect of this Plan was not explored in depth in the DEIR. GP. 41-27

The wooden pole structures of the 230KV BPA line that Sierra Pacific proposes to tap in to were not evaluated in terms of reliability and duration of life. These structures are already over ten years old, and any future upgrades due to Sierra Pacific's use of this line would constitute a cumulative impact. The EA for the construction of the BPA line did not bear itself out as true, as this size line was not needed then, is not needed now, and cannot be projected to be needed. Hence, upgrades of this BPA line would not be nearly as extensive if Sierra Pacific were not intertied. GP. 41-28

The reduction of the capacity of the BPA line was not evaluated in the DEIR. Sierra Pacific's use of this line would decrease the capacity of the BPA line. Enclosed is a copy of a letter from the BPA which describes how much the capacity would be reduced and in what way. The DEIR does not recognize or study how this reduced capacity would impact Modoc County. Even though the full capacity, in my opinion, will never be needed, the reported reduction in capacity should be GP. 41-29

studied in terms of possible cumulative impacts related to future need of Modoc County and the surround. Studies such as this were not provided in the DEIR. GP. 41-29

The phase shifter at the proposed Bordertown substation will be the largest that Sierra Pacific has, and the largest on the west Coast. Why? Is the smaller, 230KV wooden pole structure that is already over ten years old the appropriate source for the future of this phase shifter? The DEIR totally fails to address these concerns. It fails to recognize these questions. GP. 41-30

The DEIR is deficient in it's evaluation of cumulative impacts and it is deficient in it's analysis of the source.

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED JUN 05 1995

6/1/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301
RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA 31406

Dear Julie / Peter;

Why does the DEIR assume that the Summer Lake - Valley Road Alternative would have a substation at North Valley? This alternative was proposed by N.O.P.E. and a substation was not designated. A substation east of Sparks would shorten the length of the Project and avoid impacting heavily populated areas. Power could be distributed via 120KV lines to Carson City, Sparks and North Reno/Tahoe (via eg. Tracy - North Valley Alternative).

On page C.14-4, the DEIR states that "caparable impacts would be imposed" by this alternative route. How do you know? Please specifically state your sources and studies. The same pertains for your comment on the same page: "The alternative routes would also present technological and economic constraints." What constraints and how severe? Again, please state your specific sources and studies. The LADWP line was built in the 60's and they seemed to overcome these constraints. GP. 41-31

The DEIR continuously refers to a 2000 foot line separation between projects. Where are your studies? Are you assuming that WSCC recommendations are correct? If there is no definite law or set criteria, why does the BLM and CPUC make an assumption where there is no fact? Plenty of major lines are not separated by 2000 feet. Where is your evidence that this has been a problem? Please site your studies. If earthquakes are a concern (page C.14-6), why is the Proposed Project routed on top of the active Likely Fault and why is the Hilltop Substation so near an active fault? Northwest Nevada has no significant active faults and yet you use this as an example when there is a greater probability that an earthquake will disrupt service and create additional cost if the line is built on the proposed route. What if the Bonneville Dam were destroyed? Doesn't the same criteria apply?

The N.O.P.E. alternative, we still feel, is a very viable and logical alternative. We feel this alternative would have less overall impacts and the DEIR does not produce facts that state otherwise.

Thomas F. Krauel
representing NOPE
P.O. Box 321
Alturas, CA 96101

Another concern of mine is that Mary Preston and Ginger Preston, who are members of the Pit River Tribe, came to one of our meetings recently (April 27,1995) and were completely unaware of the Project. To me, this casts some doubt on the efforts to contact Native Americans. Obviously, these two members of the Pit River Tribe were concerned enough to come to our meeting. The only reason they knew of our meeting is because one of our members had told them. Up to this point, no one apparently was concerned enough to notify them the Project was even being studied. GP. 41-24

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED JUN 1 - 1995

5/30/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Dear Julie / Peter,

The negative visual impacts on our home were failed to be addressed in the DEIR. On page C.8-29, the DEIR states "Although the visual analysis does not address impacts to specific residences, based on the information in Table C.13-9, which provides a summary of the significance of visual impacts of the Proposed Project along specific angle point subsegments, the visual impacts of the transmission line would be significant from those residences located near Angle Points E03, E04, K02, K03, L04 through L06, and R01. These residences are located within the angle point subsegments that would have significant visual impacts. The visual impacts of the transmission line would also be significant from those residences listed in Table C.8-1..." GP. 41-25

Myself and my family argue that our residence, located in Daggert Canyon, would be severely impacted by the presence of this Project. Even though our residence is slightly more than the 2000 foot distance you consider to be "significant", all of our view windows and our yard are aligned toward the Proposed Project. Due to the low vegetation, skylining of ridges and structure placement on a predominant geological feature (point extending over the lower valley), our view of the Warner Mountains and our view in general will be severely degraded. Due to the Project dropping off of the ridge in front of our home, we will be affected not only in one plane, but in several. Our view will be degraded from every window in our house and from every point in our yard and driveway. The Project will not be hidden from us in any form.

Please address this in your EIR.

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED MAY 24 1995

5/18/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Dear Julie/Peter,

In it's discussion of Montane Meadow Wetlands, the DEIR states that there would be no permanent loss of this plant community. It states that most of the temporary loss (.8 acre) would result from impacts to the montane meadow habitats immediately north of the Pit River on Segment A. As with so many areas in this DEIR, the cumulative effect of the mitigation it is suggesting is not taken into consideration. For this area, lower pole height is recommended as mitigation for the sandhill crane. This means more structures and more clearings and traffic associated with the structures. GP. 41-21

Also, rows of trees are suggested as mitigation due to the severe impacts the line would have on bird populations in this sensitive area. Does it not stand to reason that rows of trees would permanently impact additional meadow? Please address this, and all the other areas of the DEIR where the cumulative effects of proposed mitigation were not taken into consideration (there are many). GP. 41-22

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

RECEIVED JUN 07 1995

5/24/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Dear Julie / Peter,

The "mitigation" in regards to the Infernal Caverns, as discussed in the DEIR, is not appropriate and is not in the best interest of the resource.

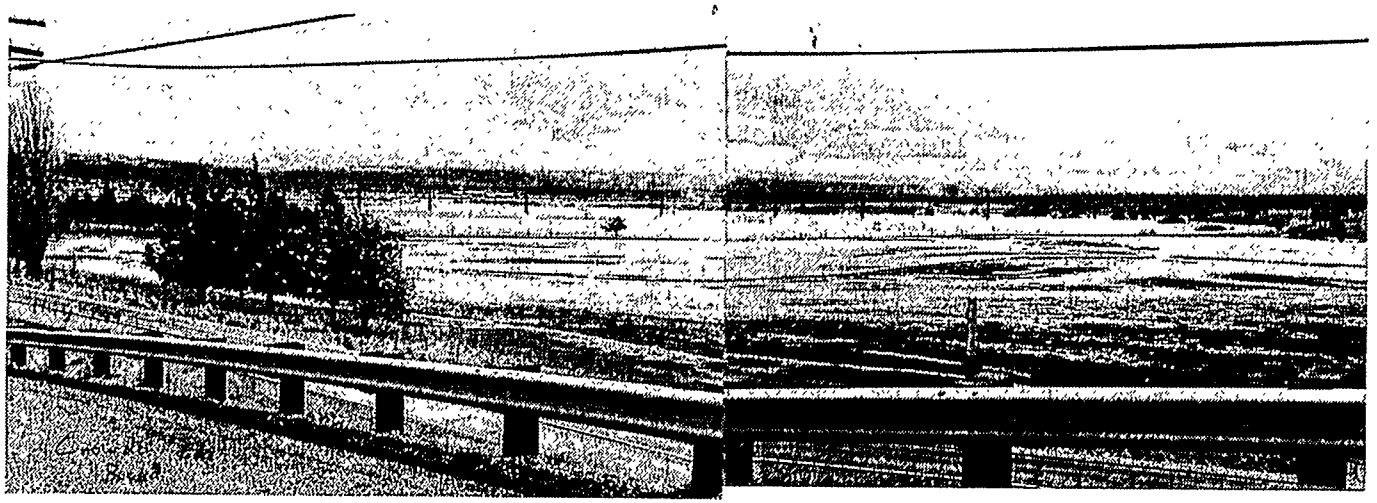
The development of an "interpretive trail" would NOT reduce the impact to the Infernal Caverns. It actually would cause a cumulative impact to the area, by:

- the development of trails
- the development of a trailhead
- increased access to the area
- increased chance of vandalism
- etc.

There was no other significant mitigation proposed. Avoidance of of the area was only casually mentioned in terms of "placing facilities and access roads as far away as possible".

Further, the property owners have not even been formally approached in regards to this "mitigation". Roy Ferry (one of the property owners) stated, in a recent conversation with me, that he was only briefly and very casually approached in regards to this issue over one year ago. No one has talked to him since. He's not even sure he would sell the property, and no price was ever discussed. This is not mitigation. This is nothing more than speculation.

The Infernal Caverns is a rare resource. It is a significant Indian battleground that has been relatively non-impacted (like so many areas in Modoc County that will be impacted by this Project). The fact that the Proposed Project will even be in the area of the Infernal Caverns and visible (even if in the background), represents a significant impact to this resource. NEPA suggests that mitigation is an effort to reduce impacts to a resource, not increase impacts to a resource. Compensation or trades are indicated only when reduction of impacts to the resource is not possible and this certainly does not pertain to the Infernal Caverns as further avoidance is possible. GP. 41-23



Auction Yard

RECEIVED
MAY 05 1995

Nancy Krauel
1203 Thomason Lane
Alturas, CA 96101

May 21, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA. 91301

RE: Alturas Intertie
CPUC#93-11-018
BLM #CACA 31406

Dear Ms. Halligan and Mr. Humm,

The DEIR states that "An intensive cultural resources survey was conducted on lands encompassed within the study area. A Class 3 cultural resources survey is a walking survey with crew members spaced no more than thirty meters apart."

According to my records and Sierra Pacific's communications to me, these cultural studies were not done on my property (of which Segment A crosses). My property involves an area north of HWY 299 and includes a large amount of Daggert Canyon. This is an area rich in cultural resources as it is near the area where the Devil's Garden breaks off into the riparian Pit River area. My impacted property is a roadless area of little or no previous impact.

GP. 41-32

Please review the enclosed documentation. Either the cultural studies were not done (as stated they were) or the court order has been defied.

Please respond to me directly and in a timely fashion on this matter.

Nancy Krauel

KATHLEEN M. DRAKULICH (Bar No. 127,655)
SIERRA PACIFIC POWER COMPANY
P.O. BOX 10100
RENO, NEVADA 89520
(702) 689-4228

Attorney for Plaintiff

ENDORSED
FILED
APR 14 1995

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MODOC

SIERRA PACIFIC POWER COMPANY, a Nevada Corporation, Plaintiff, v. DR. THOMAS F. and NANCY E. KRAUEL, et. al., Defendants.	CASE No. 13,209 OPPOSITION TO APPLICATION FOR COMPENSATION HEARING DATE: 4/21/95 HEARING TIME: 10:00 A.M. Department: Law & Motion

I.

Procedural/Factual Background

On April 8, 1994 Sierra Pacific Power Company ("Sierra") filed a Petition for an Order Permitting Entry on Property with the accompanying Points and Authorities. On April 21, 1994 Defendants Thomas F. and Nancy E. Krauel filed an Opposition to the Petition and their Declaration. The Declaration set forth the limitations that the Krauels were seeking on the Right of Entry. Paragraph 6(f) provided:

Sierra Pacific
Power Company
P O Box 10100
Reno, NV 89520

entire package with his secretary. She said she would be sure and give the package to him.

7. On April 18, 1994, at 11 a.m., I hand delivered to Dr. Krauel, at his office on Thomason Lane, a letter of intent to survey from SPPCo. Dr. Krauel was busy with a patient, so I left the letter and a sketch of the new proposed route across his property with his secretary.

8. On Friday, May 6, 1994, at 3 p.m., I called the Krauel residence and spoke with Mrs. Krauel. Dr. Krauel was not in his office. I advised her that Paul Pace, a surveyor for SPPCo. would be on their property on Sunday afternoon and possibly Monday morning to identify section corners and that an SEA survey crew would be on their property to survey the centerline and identify the 660' corridor on Tuesday.

9. On May 27, 1994, at 11:34 a.m., I called Dr. Krauel at his office. He was busy with a patient, so I left a message with Linda, his receptionist, that the wildlife biologists working on the project would be on his property the following weekend and that the crew chief's name was Patricia Mosley. I also left my phone number if there were any questions. I then called the Krauel residence in case Mrs. Krauel was at home. I got no answer.

10. On August 26, 1994, at 10 a.m., I called Dr. Krauel at his office and advised him that Dr. Denny Constantine would be contacting him about doing bat studies in the Rock Creek and Daggett Canyon areas over the next week. Dr. Krauel said it was alright with him that Dr. Constantine did his studies outside of the 660' corridor, as well as inside the corridor.

11. On September 14, 1994, at 4:30 p.m., I called Dr. Krauel at his office and left a message for him that I was inquiring as to the status of possible hunting leases on his property for the approaching hunting season.

12. On September 15, 1994, at 8:05 a.m., Dr. Krauel left a voice mail message advising me that in July he had advised Kathleen Drakulich of SPPCo. Legal Dept. that he did not have current leases for the hunting season. He also said he would again contact Ms. Drakulich regarding the current hunting lease status.

13. On October 1, 1994, at 9 a.m., I called the Krauels at their home in Alturas, as it was a Saturday, and talked with Mrs. Krauel. I told her about the surveying activities that would occur on October 3, 1994, in their area. I then told her that SPPCo. wanted to obtain their consent to extend the right-of-entry granted by the court. Mrs. Krauel suggested I leave the forms with her husband at his office and they would consider the request.

14. On October 3, 1994, at 12:05 p.m., I met with Dr. Krauel at his office in Alturas and explained our request for the Krauels to voluntarily extend the right-of-entry order granted by the court.

Krauel two copies of the ROE form. Dr. Krauel said he discuss it with his wife that evening.

On October 4, 1994, at 7:55 a.m., I met with Dr. Krauel at his office. He said he would not sign the form. He said he had changes he wanted to make. I told him that it was necessary to continue studies and that we wanted to avoid any further legal process.

16. On April 3, 1995, at 1:50 p.m., I called the Krauel residence and got their answering machine. I advised them that surveyors would be in the area that week finding section and property corners. I told them that I did not believe the surveyors would be on their property. I then left my phone number for them to call if there were any questions or concerns.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Dated this 11th day of April, 1995, at Susanville, California.

Grant B. Pankhurst

Subscribed and sworn to before me this 11th day of April, 1995.

REGINA A. RANKIN
COMM # 1012866
Notary Public — California
LASSEN COUNTY
My Comm. Expires JAN 3, 1998

Notary Public

NOTICES TO ENTER THROUGH 1/19/95

5/6/94 Grant called and left message with Nancy at home. Paul Pace, SP surveyor and Harry Erickson, an environmental flagger will be on our property through 5/10/94

5/9/94 message from SP. The above will be on our property until 5/12/94 as the crew is running behind.

5/27/94 11:30am Grant called and left a message with my office staff. Wildlife people from Aspen Envirn. Gr. will be on our property over the weekend 5/28/94 - 5/30/94. The chief is Patricia Mosley.

6/6/94 Grant called and left message with my office staff. The following will be on our property up to 6/13/94 - Patricia Mosley, wild life biologist and Steve Leach, botanist.

8/26/94 Denny Constantine will spend tonight looking at the property to study bat habitat. I talked first to Grant and then Denny. Denny said he would look near the box canyon in areas where the water was pooled. He arrived, parking at the house at around 2 pm and left around 4 pm.

10/1/94 Grant called and talked to Nancy. There will be a helicopter survey 10/3/94 and 10/4/94. Control points off proposed route for profile purposes.

4/3/95 Grant Picherest called Will be helicopter surveying today looking for section corners
257-5023

4/28/95 Grant Panchorst called at 12:50pm and left message on answering machine. Will start Mon. (5/1) doing more survey work and biologists doing environmental certification. Will probably be looking at access roads also. Will be Dave Stick or Paul Pace and Patricia Moaley. Grants number is 257-5033

Please also address in the EIS

RECEIVED JUN 06 1995

Additional Biological Surveys

Additional surveys for greater sandhill cranes, raptors, and waterfowl were conducted through the fall and winter of 1994, and the spring of 1995. These surveys are described briefly below.

Surveys for greater sandhill cranes were conducted from approximately October 3 through October 16th 1994, March 7th through 11th 1995, and the first week in April 1995 in the Alturas area.

Surveys for winter raptors were conducted December 10th through the 20th 1995, and January 5th through the 15 1995. Rough-legged hawks, bald eagles, ferruginous hawks, and red-tailed hawks were most common in the vicinity of the Krauel property.

Waterfowl surveys were conducted during the waterfowl migration period using fixed wing aircraft. A total of six flights occurred between October 1994 and May 1995. Flights included the Pit River Valley. Ground-truthing occurred upon conclusion of the flights. Several shorebird species were observed during these flights over the pit river including great blue heron, great egret, white-faced ibis, and solitary sandpiper. Waterfowl observed using the Pit River Valley included Canada geese, mallards, pintails, cinnamon teal, American coots, ring-billed ducks.

Results of the additional biological surveys described above will be delivered to the Department of Fish and Game by the end of May 1995. These reports will be available through Bob Williams, CDFG Region I, Redding California. (916) 225-2365.

Cultural Resource Surveys

Cultural resources surveys that overlap portions of the Krauel property were conducted on 7/9/94. These Class III (intensive) cultural resource surveys were conducted to the same standards as those established for the rest of the project.

According to Federal regulation and guidance regarding cultural resources, the survey data contained in the Class III cultural resource report are considered confidential information. It is within the purview of the BLM whether they release this information to members of the public.

Prepared Direct Testimony of Thomas F. Krauel

Docket 93-11-018

Q.1
Please state your name and address.

A.1
My name is Thomas F. Krauel. My address is 1203 Thomason Ln., Alturas, Ca 96101

Q.2
Does exhibit TFK, "Qualifications of Witness, Thomas F. Krauel", accurately summarize your education and background in relation to this project?

A.2 Yes

Q.3
What is the purpose of your testimony?

A.3
To represent the people of Neighbors Opposing Power Encroachment (NOPE), their views, opinions, and concerns.

Q.4
Describe Neighbors Opposing Power Encroachment (NOPE).

A.4
NOPE is a group of individuals in Modoc and Lassen counties that do not believe that the benefits of this Project outweigh the detriments. The group formed in February of 1994, approximately five weeks after the announcement of this Project to the people of Modoc County. NOPE feels that the construction of a transmission line or utility corridor at the proposed route would be a severe long term detriment to the people and environment of Modoc and northern Lassen Counties.

Q.5
Will this Project create a utility corridor?

A.5
Yes.

The glossary of the DEIR (Appendix pg A-13) defines "Utility Corridor" as "A strip of land, or an easement, on which utility facilities such as powerlines and pipelines are constructed." This Proposed Route obviously, then, fits this definition.

GP. 41-33

On page 1, paragraph 1 of Appendix A of Sierra Pacific's PEA, Sierra Pacific states: "The Project will open a new transmission corridor."

According to Sierra Pacific (exhibit "Sierra letter 5/27/1994", pg 3), the Western Utility Group's Western Regional Corridor Study defines a utility corridor as follows:

"A linear strip of land without definite width, but limited by technological, environmental and containing one or more utility, communication, or transportation facility. A corridor is a land use designation, identified for the purpose of establishing policy direction as to the preferred location of compatible linear facilities and compatible and conflicting land uses. It does not imply entitlement of use. Appropriate environmental review and regulatory permitting must precede occupancy on a project-specific basis."

The Bureau of Land Management (pg 3 and 4) characterizes corridors as:

"a parcel of land, without fixed limits or boundaries, that is being used as the location for one or more transportation or utility rights of way."

The Forest Service (pg 4) refers to the definition of a corridor as a:

"linear strip of land identified for the present or future location of transportation or utility rights of way within its boundaries."

The fact that this Project will practically and logically create a utility corridor along with it's future impacts and cumulative effects can also be borne out by the following:

#1 The Project will have a tendency to attract other north / south projects that may be planned in the future.

#2 The tendency to attract future projects, thus expanding the purpose and scope of the Proposed Project, is evidenced by the expansion of fiber optics capacity described by Sierra Pacific at the April 14, 1995 Modoc County Planning Commission meeting and the April 17, 1995 Public Hearing (in the presence of ALJ Mr. Richard Careaga).

#3 In the direct testimony of Duane L. Nelson, submitted March 30, 1995, in relation to these hearings, page 39 of "exhibit DLN-3" third paragraph states: "Tom Parker, Sierra's Vice President for Resource Planning, analyzed the future extension of the Alturas Project to the Captain Jack sbustation in conjunction with ....'upstream users, the Northwest, or the Southwest, would want to be getting through us, and would put the money in to going the second phase of that, as well as the work that would go on SWIP.' Based on these potential future expansions, Mr. Parker concluded that Alturas is the '...opening of the log jam of transmission through the Great Basin.' "

GP. 41-33

Q.6
What does the construction of a utility corridor mean?

A.6
It means something different than the construction of the Proposed Project alone. It means that there will be a greater chance of future impacts and cumulative effects that would be considered negative by NOPE, myself and the majority of the people who were concerned and responsible enough to write letters during the scoping process. It means that the future for this area will probably consist of future industrial structures. This is a significant change, as most people live and visit this area (represented by NOPE) because the probability for cumulative industrial development was very low compared to other areas in California. The construction of the Project represents an industrial addition. The construction of a utility corridor represents an industrial long term trend.

Q.7
Is there a need for a utility corridor where the Proposed Route crosses Modoc and northern Lassen Counties?

A.7
I don't know, as no formal studies agreed upon by government agencies, utilities and interested parties have been done - at least to my knowledge. The isolated studies that have been done, however, indicate no need.

The Modoc National Forest Land and Resource Management Plan Facilities Map (exhibit "Forest Service Map") indicates no need. The Western Regional Corridor Study Map (exhibit "WRCS Map") implies no need. There are no studies that I am aware of that indicate a need for a utility corridor along the Proposed Route.

Q.8
If this Proposed Project is regarded as necessary, wouldn't this then indicate a need for a utility corridor in this area?

A.8
Not necessarily. It would only simply indicate a need for the Project. The need for a utility corridor would still not be determined. Further studies would be necessary.

I don't disagree that utility corridors can be implied in certain circumstances. For instance, if you were to build a house a half mile from a relatively large switching station in an area of potential growth, common sense dictates that you may eventually end up near a future corridor - or if you were on the edge, or near an urban or suburban area, and built a house next to a 115KV line leading into this area, you would expect some utility corridor addition or change to go along with the expected change in the environment you have elected to live in. This implication, however, simply does not apply to Modoc County or other, primarily rural, nongrowth areas.

GP. 41-33

Q.9
With regards to the potential need for a new utility corridor through Modoc County, have sufficient alternate routes been explored?

A.9
No.

First, it should be pointed out that early in the scoping process the use of existing utility corridors was stressed and the seriousness of creating a new corridor was emphasized by the residents of Modoc County. The obvious way to satisfy Sierra Pacific's objectives (assuming need) without creating the complications of a new corridor would be to use an existing corridor. Following the 1000DC L.A. Power and Light line through Nevada (Summer Lake - Valley Road Alternative) would be logical and, not only would it satisfy Sierra Pacific's objectives, but would place the power closer to the areas of need. (Gold mining in 1992 accounted for about 25% of Sierra Pacific's sales and is anticipated to be the fastest growing sector of Sierra Pacific's customers.) Routes such as this, that would maximize the use of existing utility corridors, were not studied in depth and are played down due to congestion in the Sparks area (which can be avoided by breaking the line down outside of Sparks).

GP. 41-33

Sierra Pacific's Proposed Route through Modoc County makes no attempt to maximize the use of existing corridors (shorten the route outside of corridors in Modoc County). The scoping process has indicated this to be a major area of concern, and yet, unfortunately, the "disinterested third party" also appears to be failing to address this concern in the DEIR. Alternates that would minimize the amount of new corridor were quickly and inappropriately dismissed with no study (USFS Alternate is a good example). The Modoc County Planning Commissions April 14th unanimous vote to oppose the first segment of the Proposed Project reinforces the fact that insufficient alternatives have been analized.

Q.10
What are Sierra Pacific's three main objectives of this Project?

A.10
Increase Sierra Pacific Import Capacity.
Improve Reliability to Reno / Lake Tahoe Area Customers.
Provide Additional Access to Pacific Northwest Power Market.

GP. 41-34

Q.11
Do these objectives relate to the need for this Project and justify the construction of this Project?

A.11
NOPE's concept of "need" is Webster's definition - "lack of something useful". "Need", therefore, is a relative term and must be defined as such. If there was a lack of power in Reno (people couldn't turn their lights on or stay warm in the winter because there simply was no power), the people of Modoc County would certainly be more receptive to this Project and would be more willing to sacrifice their "needs" (visual, biological, etc.). An anticipated lack of power would represent a less severe "need", and may justify the construction of the approved Pinion Pine Power Plant (and it's contribution of 94MW of additional power), the eventual construction of a large transmission line and possibly even the construction of a new utility corridor - or it may simply act as a growth curb if recognized early and mitigated.

Sierra Pacific's primary objectives, however, do not relate directly to a "need" for power, but instead relate to a "need" for reliability and diversification. This "need" for reliability is largly justified in terms of WSCC criteria (page A-26 of DEIR). The Western Systems Coordinating Council (WSCC) is a voluntary alliance of over 80 utilities and affiliates. It is a peer group. Even though these criteria may be significant with respect to Sierra Pacific's standings among it's peers, and may benefit the 80 participating utilities (thereby indirectly benefiting the public), there is no guarantee that these criteria were designed for, or are in the best interest of, the public.

GP. 41-34

If the objective of Sierra Pacific in proposing this Project is to provide a reliable, low cost alternative for power into their system, it stands to reason that Sierra Pacific should then study the source. Sierra Pacific has made no attempt to do this. The ability of the Bonneville Power Administration (BPA) to serve as a reliable, low cost source of power, is questionable. The Clinton administration recently approved the National Marine Fisheries Service's massive blueprint for saving salmon. Among other provisions, this plan gives salmon priority over power production. The Clinton administration has pledged to bear the bulk of an estimated $160 million a year in new costs for saving endangerd Snake River salmon, but the plan would still cut $30 million from the annual budget of the BPA and devote that to salmon-recovery costs. In addition, it would cut the rate at which the BPA puts cash in reserves. It should also be noted that the Confederated Tribes of the Umatilla Indian Reservation unveiled a restoration policy that includes a call for the states to stop issuing new water rights in the Columbia Basin until salmon have enough water. No one knows how long the Federal Government will be able to fund the bulk of these costs, and therefore the reliability and cost effectiveness of this source is in potential jeopardy.

Q.12
Has Sierra Pacific demonstrated that the need for this Project greatly outwieghs it's detriments, beyond a shadow of a doubt?

A.12

No.

Sierra Pacific has not demonstrated a significant need for power. They have attempted to demonstrate a need for reliability and better transmission capability. Their objectives were not put forward by public demand, but by WSCC criteria and for potential economic gain.

The impacts of this Project will weigh heavily on the rural areas of Northeast California as evidenced by their objections. What is important and valuable to the people of Northeastern California is their view and environment. Their view and environment are the assets they cherish and depend on.

The increased reliance of Neveda on Columbia River power may negatively impact salmon populations in that river system and negatively impact the Indian tribes who have rights to the assets of this river system.

Even the people of Sparks are unwilling to "sacrifice" for Sierra Pacific's objectives.

The Project will create a corridor that has not been studied as such and has not been proven to be necessary.

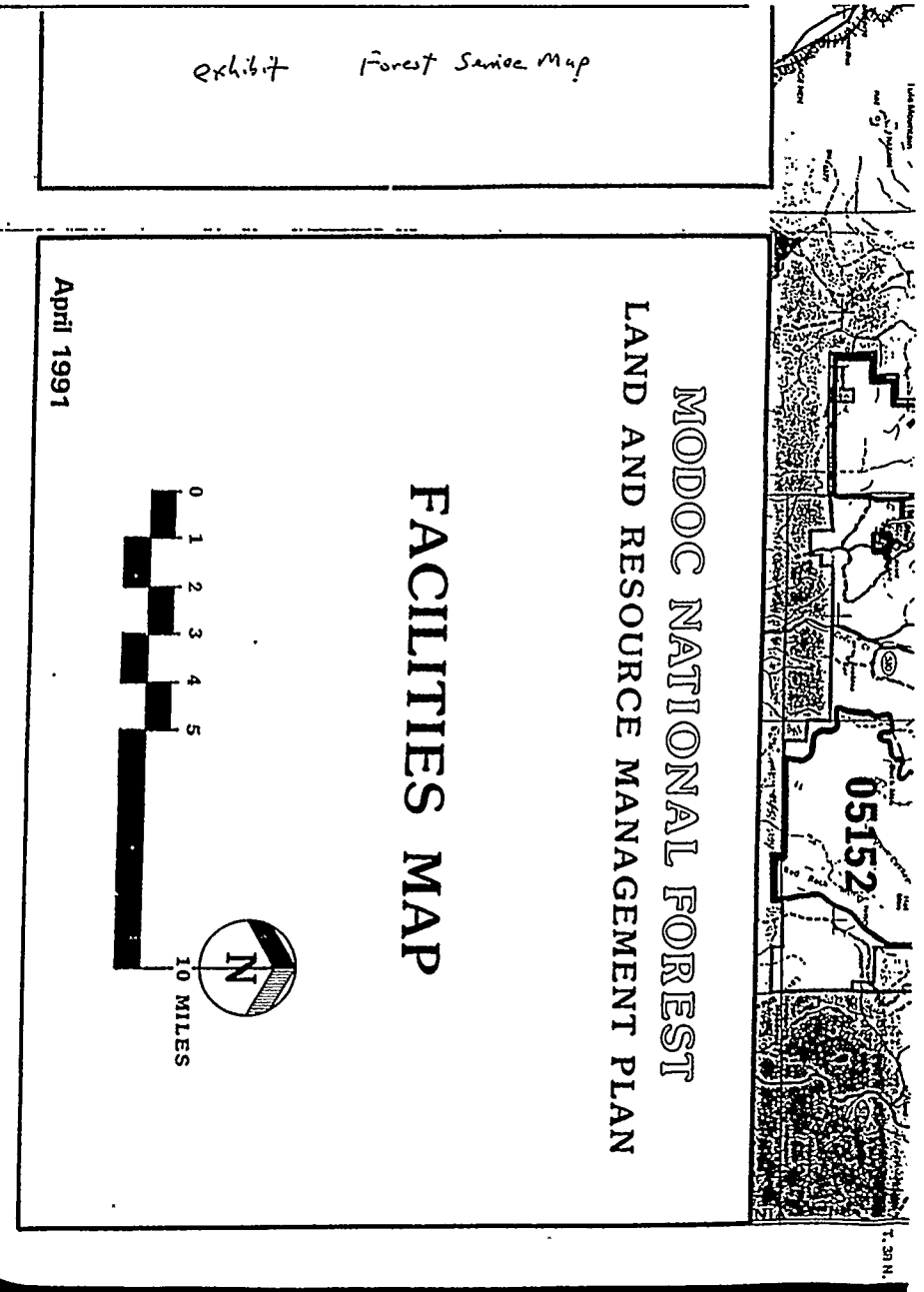
GP. 41-34

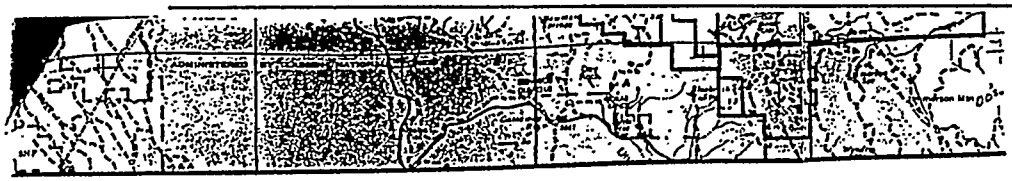
Q.13
Does this conclude your testimony?

A.13
Yes.

THFIC

exhibit Forest Service Map





FACILITIES MAP LEGEND

- Arterial Road
- Collector Road
- Local Road
- Trails
- County Road (Collector)
- County Road (Local)
- Railroad
- Power Corridors
- Airport
- approximate proposed Project route

DAMS

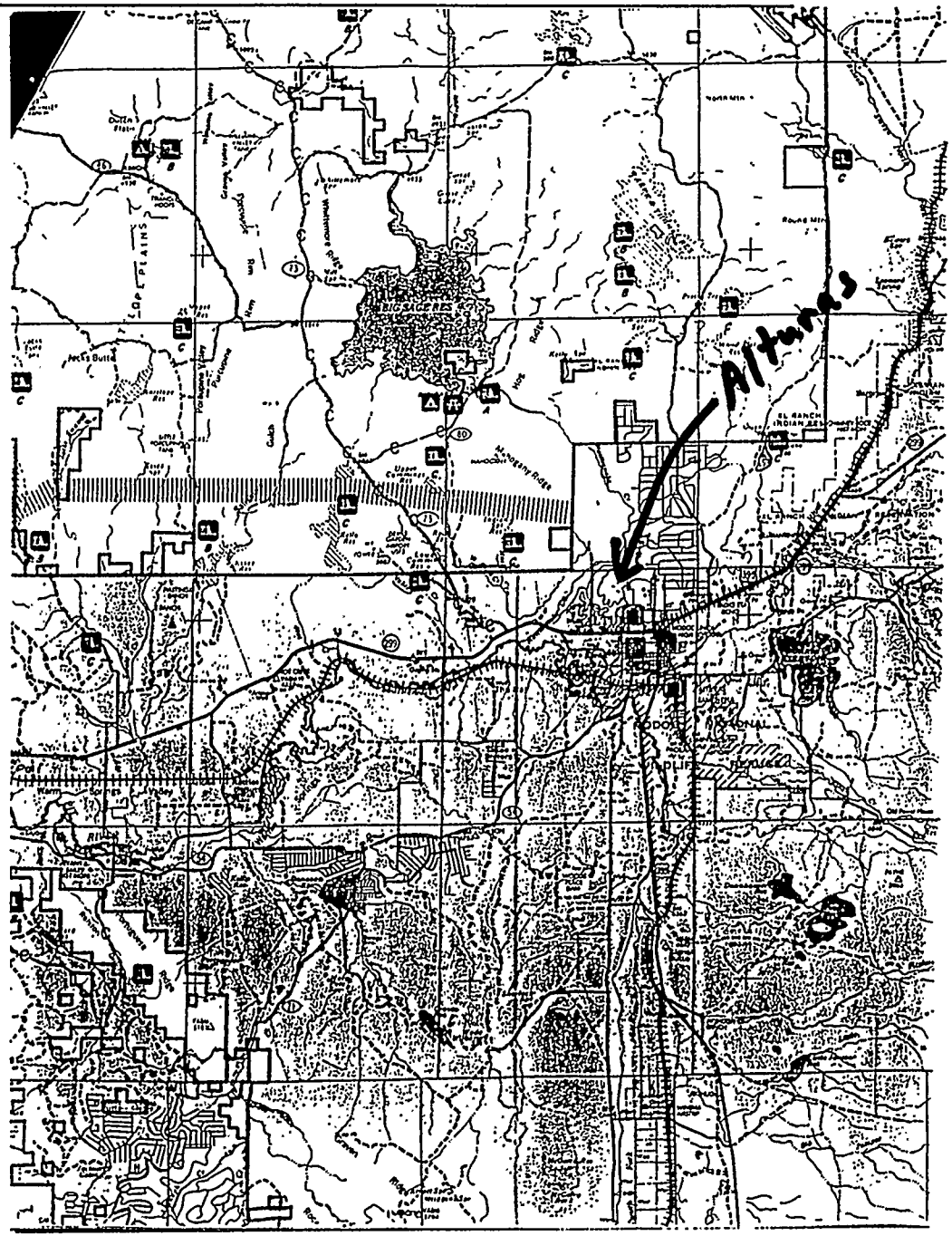
- Class A
- Class B
- Class C

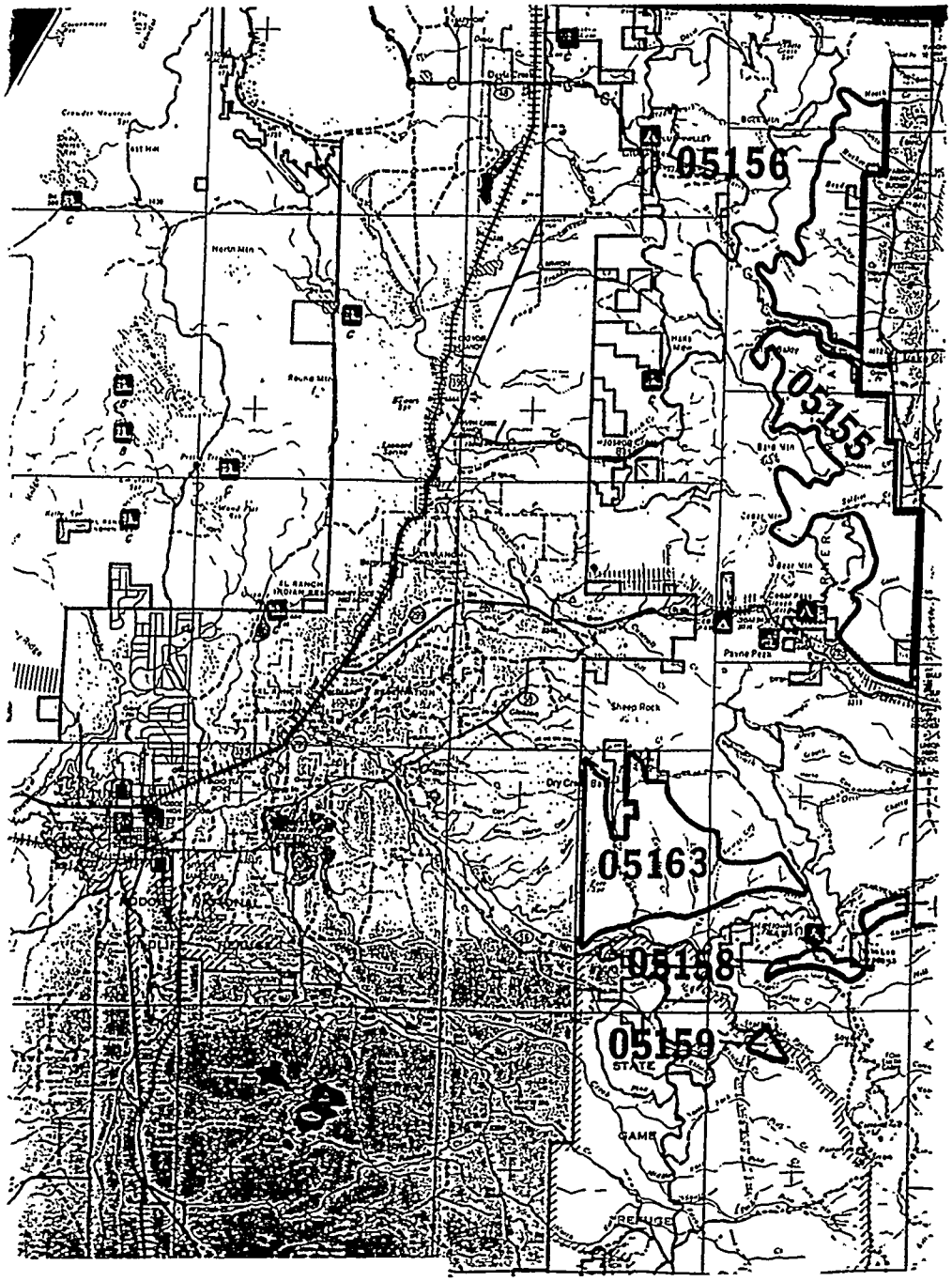
ADMINISTRATI

- Supervisc
- Ranger S:
- Guard Sta
- Compoun

DEVELOPED REC

- Boat Ramp
- Campgrour
- Picnic Gro
- Skiing Slo
- Swimming

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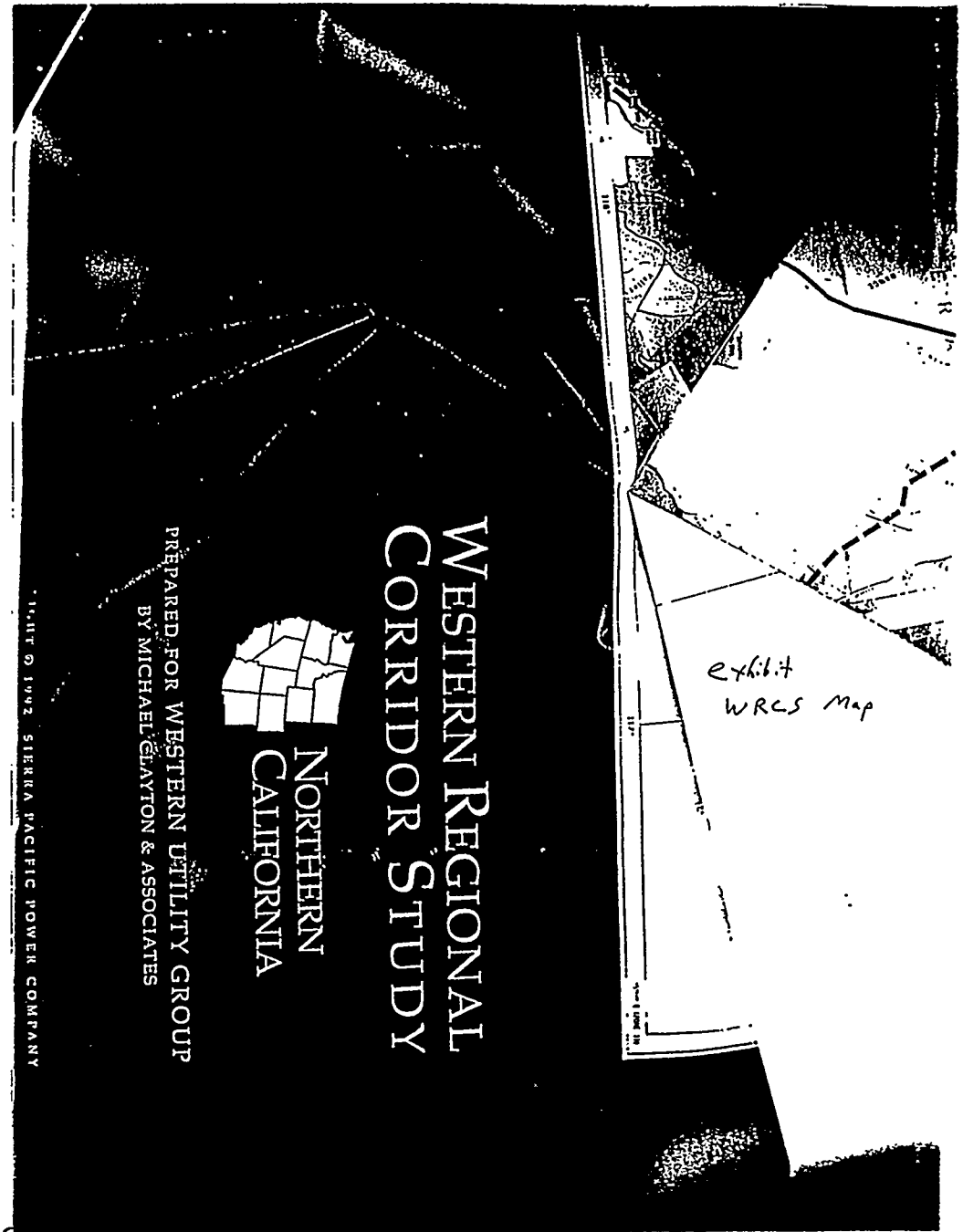
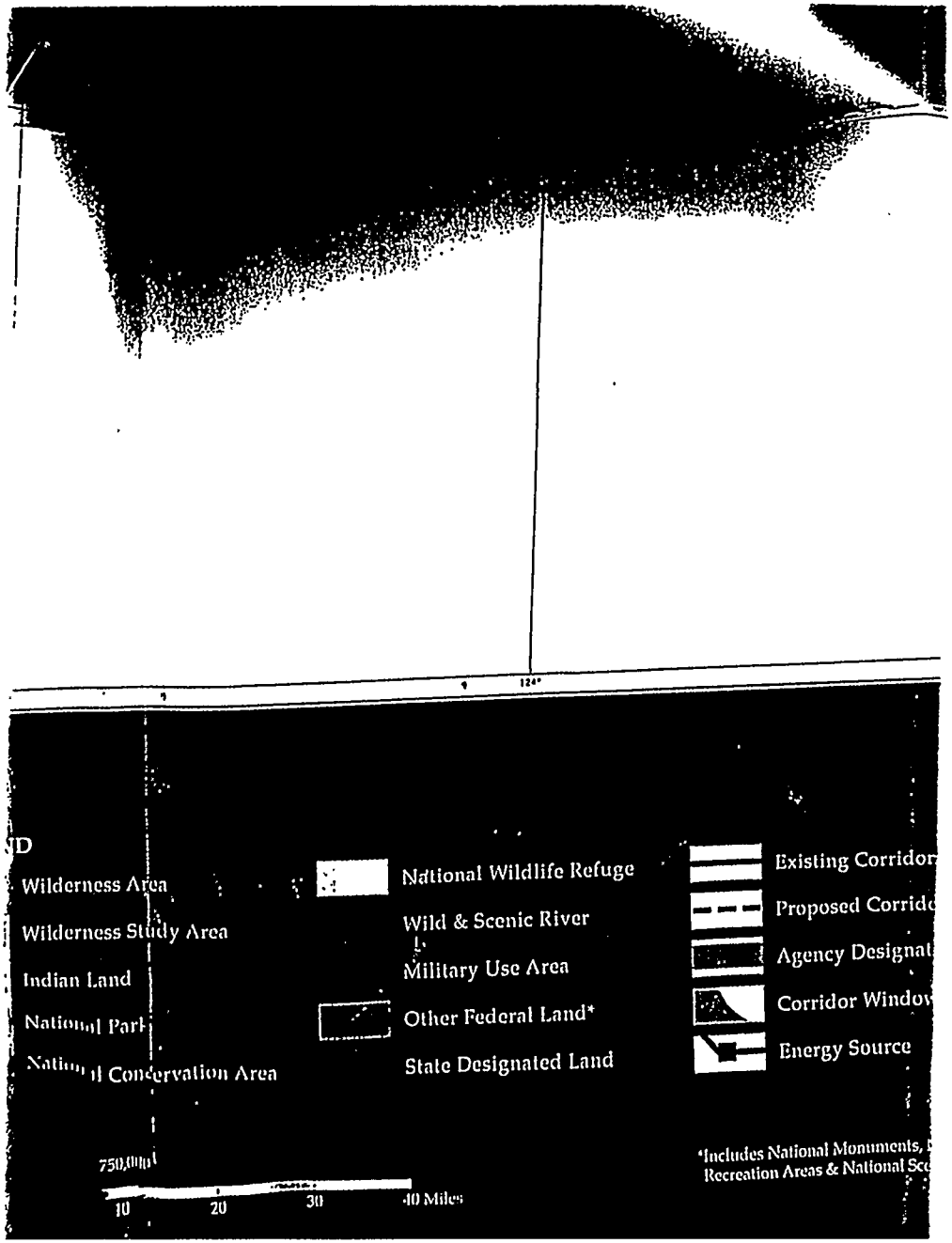
STATE
GAME
REFUGE
Sheep Rock
Dry Cr
Pyramid
Pyramid Peak
Bear Mtn
Big Mtn
Rocky Mtn
Pine Mtn
Pine Peak
Sierra Nevada
Mt Lassen
Lassen Volcanic
Mt Shasta
Shasta Lake
Redding
Anderson
Cottonwood
Corning
Red Bluff
Tehama
Gerber
Los Molinos
Vina
Chico
Oroville
Paradise
Magalia
Butte Meadows
Jonesville
Cohasset
Forest Ranch
Chester
Lake Almanor
Westwood
Susanville
Janesville
Doyle
Portola
Quincy
Greenville
Taylorsville
Meadow Valley
Paxton
Blairsden
Graeagle
Clio
Beckwourth
Sierra City
Downieville
Nevada City
Grass Valley
Colfax
Dutch Flat
Alta
Gold Run
Auburn
Lincoln
Loomis
Rocklin
Roseville
Penryn
Newcastle
Meadow Vista
Weimar
Applegate
Colgate
Dobbins
Oregon House
Wheatland
Marysville
Yuba City
Olivehurst
Plumas Lake
Beale AFB
Yuba City Regional
Marysville Regional
Oroville Regional
Chico Regional
Red Bluff Municipal
Lassen Volcanic National Park
Plumas National Forest
Tahoe National Forest
Lake Tahoe
Truckee
Sierraville
Loyalton
Sierra Valley
Portola Valley
Lake Almanor
Mt Lassen
Mt Shasta
Shasta Lake
Redding
Anderson
Cottonwood
Corning
Red Bluff
Tehama
Gerber
Los Molinos
Vina
Chico
Oroville
Paradise
Magalia
Butte Meadows
Jonesville
Cohasset
Forest Ranch
Chester
Lake Almanor
Westwood
Susanville
Janesville
Doyle
Portola
Quincy
Greenville
Taylorsville
Meadow Valley
Paxton
Blairsden
Graeagle
Clio
Beckwourth
Sierra City
Downieville
Nevada City
Grass Valley
Colfax
Dutch Flat
Alta
Gold Run
Auburn
Lincoln
Loomis
Rocklin
Roseville
Penryn
Newcastle
Meadow Vista
Weimar
Applegate
Colgate
Dobbins
Oregon House
Wheatland
Marysville
Yuba City
Olivehurst
Plumas Lake
Beale AFB
Yuba City Regional
Marysville Regional
Oroville Regional
Chico Regional
Red Bluff Municipal
Lassen Volcanic National Park
Plumas National Forest
Tahoe National Forest
Lake Tahoe
Truckee
Sierraville
Loyalton
Sierra Valley
Portola Valley


WESTERN REGIONAL CORRIDOR STUDY
NORTHERN CALIFORNIA
PREPARED FOR WESTERN UTILITY GROUP
BY MICHAEL CLAYTON & ASSOCIATES
COPYRIGHT © 1992 SIERRA PACIFIC POWER COMPANY
exhibit
WRCS Map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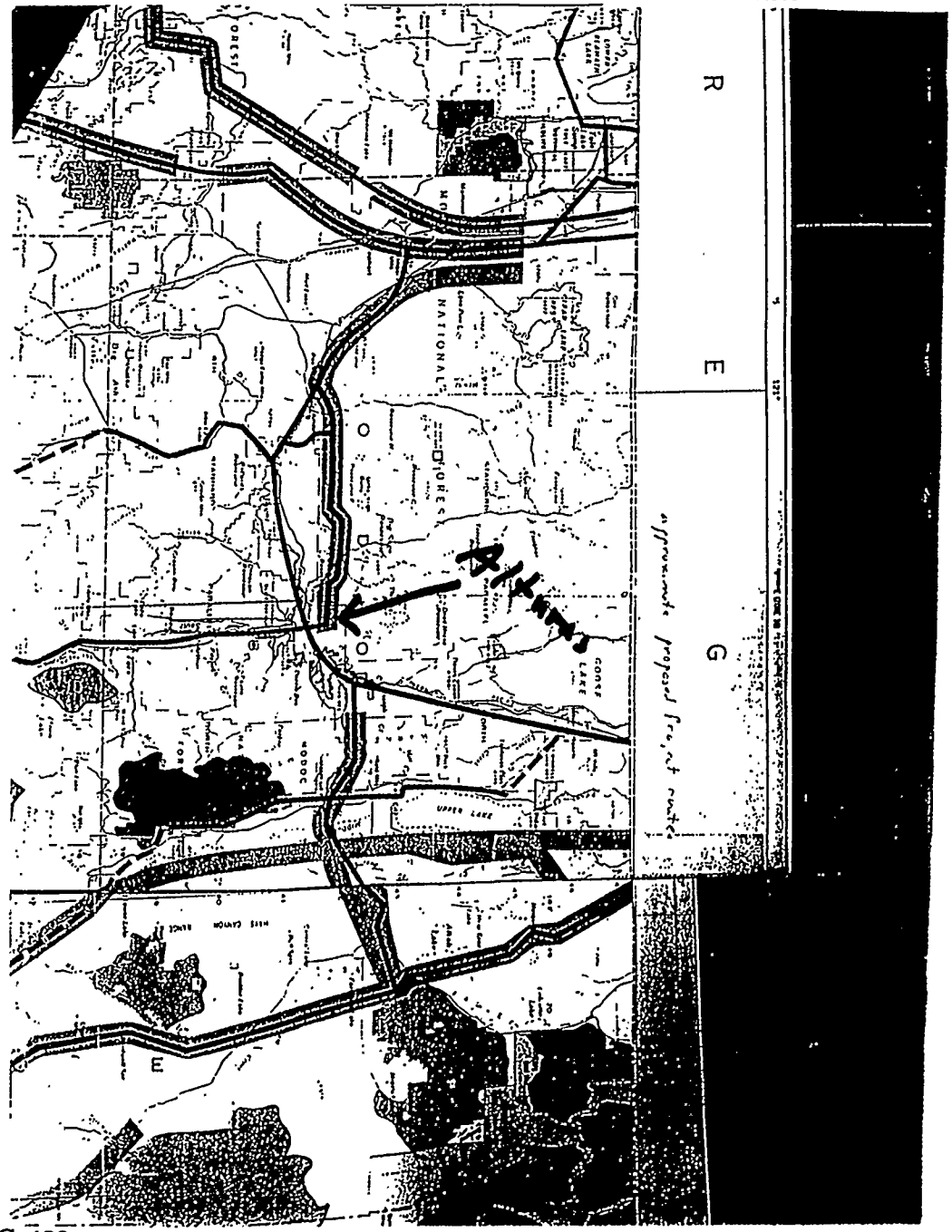
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approximate proposed fire, at route

RECEIVED
JUN 05 1995

5/29/95

Julie Halligan / Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA-31406

Segment A crosses the Pit River at the worst possible place. Not only does it impact the maximum area of meadowland and riparian area, it also crosses at an area that is prone to flooding. This stands to reason, as it crosses within a short distance of and between Rattlesnake Creek and Rock Creek. The DEIR implies that this area can be spanned, even during a 100 year flood, and yet the runoff from this year shows otherwise. Please note the enclosed photos, which demonstrate the vastness of the area that will flood.

The lines mark the approximate route. As you can see, the route passes over the widest area of flooding. This area is much greater than 1200 feet and was the widest area of flooding in the entire valley from Alturas to Canby. Note, also, that the foreground and background are much less flooded.

GP. 41-35

Please readdress this area in the EIS.

Sincerely,

Thomas F. Krauel
1203 Thomason Ln.
Alturas, CA 96101

General Public Comment Set 42

RECEIVED MAY 1 5 1995

Brandon Gentry
2515 Kiowa
Reno, Nv. 89506

Julie Halligan/Peter Humm
CPUC/BLM, c/o Aspen Environmental
30423 Canwood St.
Suite 218, Agoura Hills, Calif. 91301

Subject: CPUC #93-11-018
BLM #CACA-31406

May 2, 1995

Good Day:

I recently attented a meeting for Horizon Hill residents regarding the Alturas Project. It created quite a convention as most meetings with the General Improvement District hardly shake out 3 or 4 households to the meetings. This one was SRO. This is a unique subdivison nestled at the bottom of Peavine Mountain. Last year I purchased a lot up at the top of the subdivision where the road leads up to an old mining pond. I had to build a house because it had to be made wheelchair accessible. To keep my housebound lady happy I put in large picture windows where she can stretch on the floor and still see the mountain. For six months I've enjoyed the view but now I hear I may be looking at 16 story tall power line towers. The thought makes me downhearted. If you visit the area, you will see that it is heavily used by the community for hiking, biking, and yes, unfortunately partying by the younger folks. It would really benefit the community to put it on the other side of the hill. But that's just the beginning of my narrative.

I work at a power plant nearby Fallon in Nevada. A geothermal plant called Desert Peak. For ten years we've been producing clean electricity for Nevada residents from the power of steam from the ground. We pay royalties to the BLM and SantaFe Railroad along with county taxes. We all live locally, own our own homes and buy from local merchants. SPPCo. says they will not renew our contract paying 6.5 cents per KWH after the end of the year. They say they will continue to buy it at their avoided cost. Around 2.4 cents per KWH. Questions began to inundate to the surface of my mind. If they can buy it for so little I wonder, why did they spend so much for the gas/coal turbines of the Pinion Pine Project and why are they saying they will need to up our rates to pay for it? Why do they charge me 8.4 cents at my house if there is such cheap power available. Why do Californians pay so much if Alturas has such an abundant supply? Do you actually plan to sell SPPCo. power for under 3 cents per KWH? With a moderate understanding of the maintenance that all equipment must have to function without costly breakdowns, how do you do it? I've copied some information on geothermal and its unknown benefits. Please give it a review. And please reroute the power lines away from my home.

GP. 42-1

ThankYou for Your Time

Brandon Gentry

...no Gazette-Journal
...onday, February 27, 1995

EARTH WATCH

Utility praised for steps to reduce air pollution

■ Sierra Pacific's Pinon Pine Project: Opponents worry about proposed power line from Alturas to Reno.

By Doug McMillan
GAZETTE-JOURNAL

While few environmentalists consider power plants and high-voltage power lines positive contributions to the environment, Sierra Pacific Power Co. has won recognition for "environmental leadership" for planning to build just such projects.

Two federal agencies have recently commended the Reno-based utility for taking steps — very expensive steps — to reduce two common sources of air pollution.

The U.S. Environmental Protection Agency has credited the Reno-based utility for cutting its emissions of sulfur dioxide, a key component of acid rain.

The company's $225 million Pinon Pine Project, a proposed 107-megawatt addition to its Tracy Power Station, 17 miles east of Reno, will employ an advanced method of coal gasification to reduce SO2 and other air pollutants to negligible levels, the EPA noted.

And the U.S. Department of Energy has given the power company an award for taking steps to offset emissions of greenhouse gases, primarily carbon dioxide.

One way it plans to accomplish that is by building a $120 million power line from Alturas, Calif., to Sierra Pacific's electrical substation on North Valley Road, north of Reno.

Opponents along the proposed 165-mile right-of-way — from eastern Sierra ranchers to Reno urbanites worrying about the views from Rancho San Rafael regional park — are already mobilizing against the project.

But the Energy Department cites it as one of five major steps the company is taking to reduce greenhouse gases. The intertie will link Sierra Pacific to Northwest sources of hydroelectric power, reducing its reliance on fossil fuels.

Sierra Pacific officials are sure to play that environmental card during hearings on the project, although the debate could center more on where to put the line and its 130-foot towers, than whether it should be built.

Other programs the Energy Department listed in praising the Nevada utility for its environmental enlightenment include:

■ Buying energy from northern Nevada's numerous geothermal power plants — proportionally, Sierra Pacific uses more geothermal power than any other utility in the nation, according to Walter M. Higgins, chairman and president of the utility's parent company, Sierra Pacific Resources.

■ Building a gas pipeline from Reno to the Oregon border that will give the utility more access to western Canada's natural gas reserves — the $125 million project also will reduce carbon dioxide emissions by using more clean-burning natural gas instead of fossil fuels.

Seven of the company's nine generating units can burn natural gas, including two new combustion turbines it added to the Tracy plant last year for $55 million.

■ Encouraging customers to switch from wood-burning stoves to natural gas stoves.

■ Using natural gas to run its fleet vehicles.

■ Encouraging the use of geothermal heat pumps to substitute for propane or natural gas heating and summer cooling appliancs.

■ Promoting energy conservation — for example, Reno's National Automobile Musuem recently replaced 715 flood lamps with energy-efficient Hologen lamps.

Not only do such conversions delay the construction of more fuel-burning generators, they save customers' money. The museum will save about $10,000 a year in electric bills as part of Sierra Pacific's Light Brigade Commercial Customers Lighting Efficiency Program.

Sierra Pacific officials recently met with Energy Secretary Hazel O'Leary in Washington to sign a Climate Challenge Participation Accord, President Clinton's program to get industries to reduce greenhouse gases voluntarily.

Their acid rain "bonus allowance" credits from the EPA have a practical application, too. They can be bought, sold or banked to offset sulfur dioxide emissions from future power projects, a Sierra Pacific spokesman said.

The Reno-based utility has received 835 acid rain "bonus allowances", or credits, from the EPA for avoiding SO2, a chemical formed in burning fossil fuels.

Only one other utility, Puget Sound Power & Light of Washington, received more credits than Sierra Pacific. To date, only 15 utilities in the country have received bonus allowances.

Sierra Pacific Power Company
Your Energy People

January 9, 1995

Mr. Thomas R. Mason
Senior Vice-President
California Energy Company, Inc.
10831 Old Mill Road
Omaha, NE 68154

RECEIVED
JAN 13 1995
Ans'd .....

Dear Mr. Mason:

I would like to take this opportunity to introduce myself and advise you that I will be working with Karen Foster on our geothermal contracts. In the future, you will be hearing from either Karen or myself on issues that need to be addressed.

The purpose of this letter is to advise you that the present Desert Peak Power Purchase Agreement expires January 1, 1996. Per the provisions outlined in Section 4.0 - Term:

> "This agreement and all provisions hereof shall be effective from the effective date hereof until the date that is ten (10) years from the date that Initial Production commences, and shall continue thereafter under the applicable terms and provisions of this agreement, from year to year by mutual written consent of the parties, unless mutually agreed otherwise."

Sierra hereby provides notice that we intend to terminate the Agreement for the Purchase and Sale of Electricity from Desert Peak effective January 1, 1996. As you are aware, under current law and Commission Order, Sierra will purchase available capacity and energy from Desert Peak at our short term avoided cost rate. Enclosed you will find a copy of our Schedule No. CSPP 1994 short term rates for your reference.

If you wish to discuss other alternatives or if you have any questions, please call me at (702) 689-4925.

Sincerely,

Kathleen A. Ryan

Kathleen A. Ryan
Staff Analyst
Power Contracts

cc: Randy Harris
Karen Foster
Connie Westadt

6100 Neil Road P O Box 10100 Reno Nevada 89520-3026 Telephone 702/689-4011

SIERRA PACIFIC POWER COMPANY
6100 Neil Road, Reno, Nevada
Tariff No. Electric No. 2 Cancelling 17th Revised P.S.C.N. Sheet No. 2
16th Revised P.S.C.N. Sheet No. 2

SCHEDULE NO. CSPP

SHORT-TERM RATES
COGENERATION AND SMALL POWER PRODUCTION

APPLICABILITY

This schedule is applicable only to purchases from Qualifying Facilities as defined in Utility's Nevada Electric Tariff No. 1 Rule No. 15 under a Short-Term Purchase Agreement with Utility and where no other schedules are specifically applicable.

RATES

Utility will pay the sum of the following rates for the energy and capacity provided as determined by meter readings:

(1) ENERGY RATE

a. Time-differentiated:

	1994				
	1st Quarter 01/01-03/31	2nd Quarter 04/01-06/30	3rd Quarter 07/01-09/30	4th Quarter 10/01-12/31	
Winter					
All On-Peak kWh, per kWh	$0.02455	$0.01869	N/A	$0.02445	(I
Plus all Mid-Peak kWh, per kWh	$0.02455	$0.01870	N/A	$0.02437	(I
Plus all Off-Peak kWh, per kWh	$0.02168	$0.01662	N/A	$0.02159	(I
Summer					
All On-Peak kWh, per kWh	N/A	$0.01860	$0.02299	N/A	(I
Plus all Off-Peak, kWh, per kWh	N/A	$0.01696	$0.02049	N/A	(I
b. Non-time differentiated: (See Special Condition 3)					
All kWh, per kWh	$0.02348	$0.01787	$0.02174	$0.02334	(I

(Continued)

Issued: 05/01/94	Issued By: William L. Keepers President	
Effective: 05/01/94		
Advice No. 329-E		

GEOTHERMAL RESOURCES COUNCIL

Nevada Section P.O. Box 5151 Reno, Nevada 89513

BULLETIN

1994 Officers

President Thomas Flynn, Division of Earth Sciences
Vice President Ted DeRocher, Caithness Corporation
Secretary/Treasurer Lisa Comstock, SB Geo Inc.
Desktop Editor Paul Buchanan, Division of Earth Sciences

Volume 8 No. 1 April, 1995

FRONT LINE - T. Flynn

The Nevada Geothermal Year in Review

In his February 23, 1995 letter to shareholders, SCEcorp Chairman of the Board and Chief and Executive Officer John E Bryson summed it up for all of us when he wrote,

"SCEcorp had a difficult year in 1994."

Welcome to the club, Mr. Bryson.

In July, 1994, Nevada quietly celebrated 10 years of geothermal electric power production. The "Gunion" (garlic & onion) geothermal dehydration plant began operations in the San Emidio desert. The gross installed electrical capacity for Nevada's 13 geothermal power plants at 11 sites total about 210 MW in 1994 (Figure1). Those may have been the high points of the geothermal year.

- In April, The Nevada Public Service Commission rejected a contract negotiated between Sierra Pacific Power Company and Yankee-Caithness Joint Venture for the purchase of 12.5 megawatts of geothermal power.
- In November, we lost two very good friends.

Dick Whiting

Dick Whiting, Nevada Division of Minerals, Oil, Gas, and Geothermal field inspector, passed away on November 4 after a lengthy illness. Russell Fields, DOM's administrator writes,

"Dick had a great love for his business of drilling oil and geothermal wells and Nevada was fortunate that he decided to move from the private sector and into public service in 1987. Dick was viewed by most as a very fair and knowledgeable regulator. He had personally done virtually every job related to drilling and he knew the right way and the wrong way. Most of all he was definitely not afraid to express his opinion. Dick Whiting will be missed by everyone in Nevada's oil and geothermal patches and especially by those who worked with him."

John Bickerstaffe

John Bickerstaffe, Manager of Engineering for Oxbow Power Corporation passed away at his home on November 20. John was well known to the geothermal community in Nevada, the United States, and throughout the world. His career spanned more than 20 years and several continents. John served in various capacities on geothermal projects in the Imperial Valley, California, Iceland, Dixie Valley, and Hawaii. He was probably the least pretentious, least cynical, most honest, and open individual I have ever met. He was pleasant, personable, and brilliant - which can be a rather disarming combination in the geothermal industry. His decisions supported the business side of geothermal energy, but he also had a vision of expanding the role of solar energy throughout the world.

COMPARATIVE ECONOMICS AND BENEFITS OF ELECTRICITY PRODUCED FROM GEOTHERMAL RESOURCES IN THE STATE OF NEVADA 1994

Phase I

Prepared by:

Janine Haberle and Thomas Flynn

Division of Earth Sciences

Harry Reid Center for Environmental Studies

UNLV

University of Nevada Las Vegas

Prepared for:

The Geothermal Energy Association,

in association with

The Nevada Geothermal Council

January, 1995

TABLE OF CONTENTS

Foreword v
Purpose vii
Summary of Findings vii
Recommendations ix
Acknowledgments ix
Introduction 1
Geothermal Energy Resources 1
Power Generation and Direct Utilization 1
Energy Policy 4
Externalities 6
Comparative Economics 8
Application of General Order 65 9
Renewable Energy Benefits 12
Air Quality and Visibility 12
Economics 14
Fuel Diversity 15
Conclusions 17
References 18

LIST OF FIGURES

1 Location of Nevada's geothermal power plants 2
2 Volatility in the price of the benchmark West Texas Intermediate Crude Oil 5
3 Clean air corridor for the "Golden Circle of Parks" 13
4 Timeline of geothermal development in Nevada 16

LIST OF TABLES

1 Comparison of states that produce geothermal electricity 3
2 Nevada's geothermal power plants 4
3 Comparison of environmental externality values for residual emissions 7
4 Comparative costs of electricity from natural gas, coal, and geothermal power plants 8
5 Levelized resource cost 8
6. SPPC Resource Planning PROMOD Cases for Evaluation 10
7a. Effect of PSCN externality adders 11
7b. Effect of SPPC externality adders 11
8. Tons of pollutants NOT emitted in 1993 by Nevada's geothermal power plants 13
9. Revenue and taxes received from geothermal operations in Nevada 15

PURPOSE

This report details the economic and environmental advantages of electricity produced from geothermal resources. It expands and updates the report published by the Nevada Department of Minerals, "Economic Impacts of the Nevada Geothermal Industry - 1989" by Wendy Favinger. Additional information was supplied by the Center for Energy Efficiency and Renewable Technologies (CEERT), which provides guidelines and recommendations on environmental equity between fossil-fuel and renewable energy sources and cost-effective energy conservation. The environmental benefits of geothermal energy utilization, in particular, the Public Service Commission of Nevada General Order 65 and environmental externalities, will be discussed in detail. This report will be supplemented by the development of an econometric model that will demonstrate and quantify the value of long term environmental benefits.

SUMMARY OF FINDINGS

- Nevada's significant geothermal resources produce about 210 MWe, enough for more than 200,000 homes. Nevada's total production ranks number two in the country, and number one on a per capita basis.
- Geothermal advantages over fossil fuels include:
  - Competitively priced,
  - Minimal or negligible atmospheric emission,
  - Smaller, economically sized plants closely match load growth,
  - Geothermal plants provide long-term, high-capacity factor operation,
  - The capital cost of geothermal facilities has declined,
  - Fuel diversification assures energy supply,
  - Decreases U.S. dependence on foreign oil,
  - Future air quality legislation could impact fossil fuel costs,
  - Geothermal plants provides jobs and taxes for Nevada,
  - Reduce system losses because of location within service area.
- Public Service Commission of Nevada recognized economics, reliability, and environmental advantages of geothermal energy and implemented General Order 65 which required Nevada's Public Utilities to integrate both societal and environmental costs in resource plans.
- G O. 65 stipulates that Nevada utilities must take into account the environmental and societal costs of electric power production in their resource plans. The Present Worth of Societal Costs (PWSC) is obtained by adding the environmental costs to the Present Worth of Future Requirement for Revenue (PWRR). The PWRR remains the primary criterion for determining the least-cost option.
- In the first application of G.O. 65 to a resource plan (July, 1992), Sierra Pacific Power Company used Public Service Commission of Nevada default values and as well as their own recommended externality values. In their final recommendation, the externality and societal issues were not used to determine the electric power resource option.
- As recently as October 8, 1993, the Public Service Commission of Nevada reaffirmed their own default values and ordered Docket No. 89-752 be closed with no revision of the table or regulations related to environmental valuation.
- Since its implementation in January, 1991, not a single power purchase contract has resulted from the provisions of G.O. 65.

RECOMMENDATIONS

- The Present Worth of Societal Costs (PWSC) must replace the Present Worth of Revenue Requirements as the "primary" criterion in the resource planning and case evaluation.
- In order to be effective, PWSC values for resource options must be compared on a head-to-head basis, instead of combined with other generation options where the value of the externalities is lost.
- The flexibility afforded utilities in using their own externality values should be abolished.
- The Nevada State Legislature should design an energy policy with the major utilities to establish a long term plan to incorporate more renewable energy resources into their present energy mix. Of the nearly 1,200 MWe that Sierra Pacific Power Company either generates or purchases, about 120 MWe, or 10%, comes from geothermal resources. Nevada Power Company has no direct transmission lines to northern Nevada, where the geothermal resources are located
- By the year 2011, Sierra Pacific Power Company's resource mix is projected to total about 2,000 MWe An achievable and worthwhile goal for this utility is to incorporate more renewable energy into its resource mix. A total of about 400 MWe, including geothermal, biomass, solar, and wind power over the next 15 years would mean that 20% of the resource mix would be derived from renewable energy This report has demonstrated that, although the addition of renewables makes environmental and economic sense, the utilities remain unconvinced. That issue may be resolved quickly with a Legislative mandate to incorporate renewables into the utility energy mix These ideas should be more fully addressed within the context of legislation currently being considered under Senate Concurrent Resolution No. 35 (Senator Dina Titus, Chair), which directed the Legislative Commission to conduct an interim study of Nevada's current and future energy needs and to formulate a policy regarding the conservation and development of energy resources in this state.
- Since the use of additional renewable resources enhances our national energy security, reduces regional air pollution, and provides increased visibility in National Parks, these actions should be encouraged on the federal level with a combination of tax credits and financial incentives

ACKNOWLEDGMENTS

The authors gratefully acknowledge the support of the Geothermal Energy Association and the Nevada Geothermal Council, particularly Thomas Quinn, Jim Gilbert, and Dan Schochet. Jim Caldwell (formerly with CEERT, now with the U.S. DOE Office of Policy) provided valuable data and assistance. John Candelaria and Thomas Henderson helped with Public Service Commission of Nevada issues Richard Hoops, BLM, provided the production data for geothermal power plants. Paul Buchanan was instrumental in the graphics and layout of the report. Various employees of Sierra Pacific Power Company and Nevada Power Company assisted the authors with obtaining copies of and interpreting the Integrated Resource Plans. Dennis Trexler and Mike Wright provided critical reviews of various draft copies of this report

INTRODUCTION

Nevada's geothermal power plants presently generate approximately 210 megawatts (MWe) of electricity (gross), enough electricity for about 200,000 households. This places Nevada second in the U.S. for overall geothermal energy utilization and number one on a per capita basis. Modern development began during the 1980's, but geothermal utilization can be traced from prehistoric applications by indigenous Native Americans to modern uses. In July, 1984, the first electricity generated from a Nevada geothermal resource occurred at Wabuska, in Lyon County. The binary electric power plant yielded an output of 600 kW, and the electricity was purchased by Sierra Pacific Power Company (SPPC). Today, Nevada's geothermal resources support twelve electric power plants at ten sites, representing a total investment of approximately $450,000,000. Several large-scale direct use projects have also provided significant economic and environmental benefits. Conservative estimates suggest that the 210 MWe presently produced in Nevada could easily be doubled, or tripled, from identified, existing geothermal resources if sufficient market demand exists.

Geothermal resource development in Nevada, and throughout the world, is accelerating for several reasons; the finite-nature and volatile costs of conventional fossil fuels; economic and institutional incentives; the environmental impacts of combustion; and technological advances within the geothermal industry. The key to sustained geothermal development is to balance long-term energy demands and costs, with long term environmental and economic benefits.

GEOTHERMAL ENERGY RESOURCES

Geothermal energy is simply the heat generated from natural processes within the Earth. Volcanoes are the most spectacular manifestation of this heat energy, but other examples include geysers, hot springs, and geothermal wells. Geothermal resources are widespread throughout the western U S In Nevada, for example, more than 900 hot springs and wells have been identified, more than any other state (Trexler et al., 1983)

In theory, there are four kinds of geothermal resources that are suitable for electric power generation: hydrothermal; geopressured; hot dry rock; and magma Currently, all commercial geothermal electric power generation comes from two types of hydrothermal resource, vapor dominated (steam) and liquid dominated (hot water) Vapor-dominated hydrothermal resources include The Geysers, in northern California, and Cove Fort, in western Utah. All other geothermal resources in the U.S. are liquid dominated, which are far more abundant. Nevada's geothermal energy is produced from wells drilled into and completed within a reservoir that consists of fractured rock.

POWER GENERATION AND DIRECT UTILIZATION

Nevada presently produces approximately 210 MWe of electric power from geothermal resources. It is second only to California in total electrical output, and first on a per-capita basis (Figure 1 and Table 1).

Several technologies have been developed to extract heat efficiently from liquid-dominated resources, including single flash, dual flash and binary-cycle systems (Table 2). The specific technology utilized at a site depends on geothermal resource characteristics such as the fluid temperature, pressure, non-condensible gas content, and mineral content

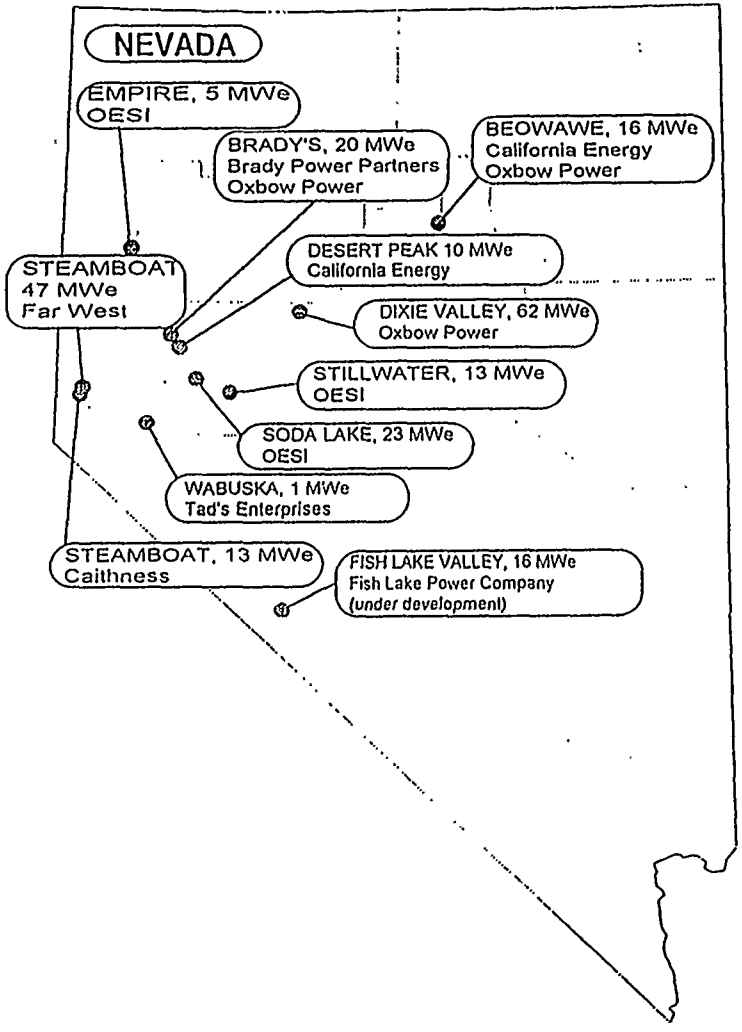


Figure 1. Location of Nevada's geothermal power plants showing production in megawatts and the name of the plant operator.

Table 1 States that produce geothermal electricity.

State	Population	Installed Geothermal	Watts/Person
Nevada	1,200,000	210 MWe	173
California	30,000,000	2,500 MWe	83
Hawaii	1,120,000	25 MWe	22
Utah	1,730,000	33 MWe	5

- Population data from 1990 Census. - Electric Power Data (Hoops, 1994)

According, to Rose McKinney-James (1994), the Director of the Department of Business and Industry for the State of Nevada, ten geothermal plants were in operation in 1992, with a total installed capacity of 191.7 MWe, representing an increase of 31 percent from the year before. The three new geothermal plants that began production in Nevada in 1992 had a total rated capacity of 45.1 MWe. The Nevada Bureau of Mines and Geology (NBMG, 1993) estimates that Nevada's existing resources could produce at least 600 MWe with present technologies. With advanced technologies applied to exploration and production Nevada has the potential to develop an additional 1,000 MWe of geothermal power over the next 20 years.

One of the most far-reaching developments is the emergence of a competitive breed of "independent power producers." These new competitors build power plants and sell electricity under long-term wholesale agreements to investor owned and public utility companies. This policy, which represents a significant change in the industry, is the direct result of the implementation of PURPA - the Public Utility Regulatory Policies Act of 1978. PURPA opened a nearly untapped segment of the power market to unregulated companies. These companies are largely responsible for the construction of generating plants that utilize renewable energy sources to generate electricity and co-generation facilities that supply electric power and heat for commercial and industrial applications. PURPA's impact is evident in California and Nevada, where thousands of MWe of renewable-energy-based and co-generated projects have been installed and may continue to be the focus of future power generation.

Electric power generation and the preservation of the environment are of tremendous importance to Nevada's utility industry. Geothermal power plants, for example, have incorporated several award-winning technologies. The California Energy Co., Ormat Energy Systems, Inc. (OESI), and Pacific Gas & Electric Co., have received environmental awards for their role in reducing greenhouse gases and ozone depleting chemicals. The awards recognize the reduction in pollutants achieved by modifications to the power generation process. In full-scale operation, all non-condensible gases present in the geothermal fluid are injected into the reservoir, virtually eliminating atmospheric emissions.

The American Society of Mechanical Engineers recently recognized Ormat's development of technology that economically generates electricity by using lower temperature heat sources. The use of closed-loop binary systems produces no airborne emissions at all. Furthermore, the development of air-cooled condensers eliminates the consumption of surface or ground water in the cooling process (EIA, 1991).

SPPC was recently recognized in the June, 1994 issue of Money Magazine as an environmental leader among the top utilities from around the country who are "outstanding in pollution control, hazardous waste reduction, and energy conservation." More recently, SPPC was

Table 2. Nevada's geothermal power plants

Plant Name Owner/Operator	County	Year On-line	Installed Capacity (MWe)	Estimated Cost of Construction ($000)	System Type
Wabuska Tad's	Lyon	1984,'87*	1.2	2,000	Binary Cycle
Desert Peak California Energy	Churchill	1985	10.0	18,000	Single Flash
Beowawe California Energy/Oxbow	Lander	1985	16.3	30,000	Dual Flash
Steamboat Far West	Washoe	1986,'88,'92	47.0	70,000	Binary Cycle
Soda Lake OESI	Churchill	1987,'91	23.0	45,000	Binary Cycle
Empire OESI	Washoe	1987	4 8	12,000	Binary Cycle
Steamboat Caithness	Washoe	1988	13.5	30,000	Single Flash
Dixie Valley Oxbow	Churchill	1988	62.0	140,000	Dual Flash
Stillwater OESI	Churchill	1989	13.0	37,000	Binary Cycle
Brady's Brady Power Partners/Oxbow	Churchill	1992	20.0	65,000	Single Flash

*Note. multiple years indicate power plant additions or modifications

one of six utilities to receive acid rain bonus allowances from the U.S. Environmental Protection Agency for undertaking energy efficiency and renewable energy measures. Some of this recognition can be attributed directly to SPPC's incorporation of geothermal energy into its resource plan.

It has been projected that geothermal capacity and generation in the USA could realistically increase from 2,590 MWe in 1990 to 23,400 MWe in the year 2030 (EIA, 1991). These forecast amounts were based on expected expansions from fields developed in California, Nevada, and Utah, as well as the development of new fields in Oregon, Hawaii, and New Mexico. However, these assessments require that renewable energies receive a share of the power market along with existing electricity generation technologies.

In addition to electricity, geothermal energy is presently used for district, commercial, and residential space heating systems in Elko and Reno, for vegetable dehydration plants at Brady's Hot Springs and the San Emidio Desert, to enhance cyanide heap leaching operations at the Round Mountain gold mine in Nye County, and to raise catfish at the Duckwater Indian Reservation.

ENERGY POLICY

The efficient use of energy resources is a critical multi-faceted national issue as illustrated by the volatility of the benchmark West Texas Intermediate crude oil prices for the last 25 years (Figure 2). Dwindling domestic proven reserves of petroleum resources and increasing reliance on foreign sources complicate the situation by distorting the U.S. balance of trade with petroleum

exporting countries The problem is further compounded by a growing awareness and concern over global air pollution from fossil fuel combustion. The key to the development of a viable National Energy Policy is to properly balance energy, environmental, and economic issues

Three major factors presently shape World Energy Policy: petroleum, pollution, and politics. The availability of fossil fuels, particularly natural gas and petroleum, are economical and versatile, but in the long-run may be problematic. The constraint is not strictly the natural abundance of petroleum, but the geographical and political limits of having nearly two thirds of the world's current oil reserves located in the politically unstable Persian Gulf region (British Petroleum, 1990).

The second limitation is an environmental issue that taxes our collective capacity to cope with the overwhelming burden of the pollution produced by the $20 trillion dollar fossil-fuel-based world economy. Massive air pollution and acid precipitation problems in the U.S., Mexico, Eastern Europe, and parts of Asia, as well as the threat of global warming, demand that stricter limits be placed on fossil fuels combustion

The third constraint addresses the powerful political, economic, and social forces that significantly influence world energy choices and policy. The power generation industry has begun to respond to these pressures by reducing air pollution from existing fossil-fuel plants, engineering new coal-fired plants with emission-reduction equipment, and integrating abundant and clean solar and geothermal energy resources into their energy mix. While these changes are challenging, the most important challenge is political: societies need to overcome narrow economic interest and revamp energy policies in order to develop dependable, economic, and clean energy systems.

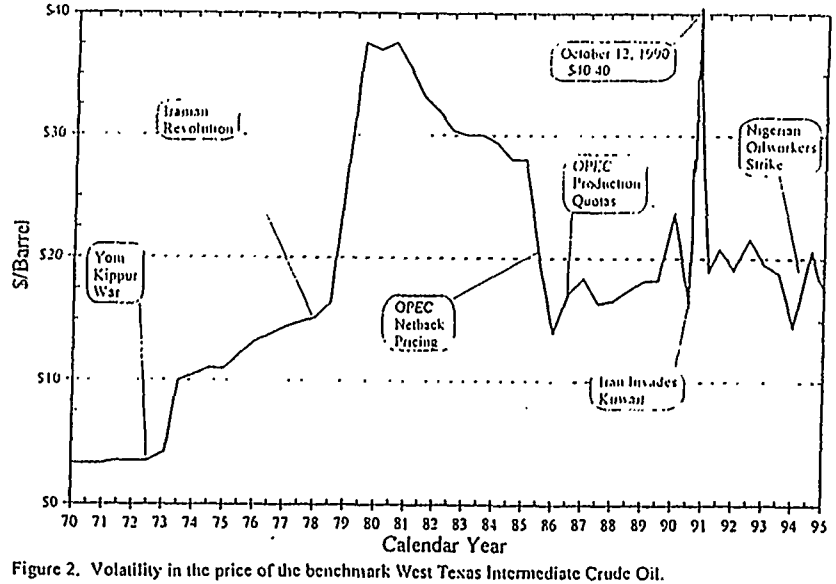


Figure 2. Volatility in the price of the benchmark West Texas Intermediate Crude Oil.

EXTERNALITIES

Externalities are defined as a benefit or cost that creates a change in the economic welfare of someone other than the buyer or seller. For example, if a utility does not pay to mitigate emissions or particulates created by power generation, they become external. If the costs to mitigate are not borne by the utility or the utility rate payer, they become societal costs of production. These environmental externalities are an "unpriced good" in the market and therefore considered a public good. In order for a utility to be charged for emissions created in energy generation, a value must be assessed and attached to the good or service In the market place, individuals exercise choice by comparing their willingness to pay on the basis of the price of the product relative to another product of greater or equal value. They purchase a good, in this case electrical power, when their willingness to pay equals or exceeds the price, and not otherwise. The process of economic valuation involves finding a measure in circumstances where markets fail to absorb the real price, including the environmental externalities, and where the market fails to reflect true costs of production

This market failure concept is important for the allocation of resources within an economy In the energy market, if the production of electricity involves using fossil fuels that erode our standard of living by the emissions they produce, then the damage done may not be reflected in the choice of technology or electrical generation resources used. Market failure occurs when costs are borne by entities other than the energy users for the environmental damage to society as a whole. For example, the siltation of rivers caused by strip-mining and the subsequent damage to reservoir storage capacity is an externality The destruction of the salmon fishing industry on the Columbia River, which resulted from the construction of dams used in the production of hydroelectric power, is an externality Failure to account for these external costs gives rise to a misallocation of resources in the economy, in this case through the choices made in electricity generation methods Making choices that avoid this misallocation of resources involves understanding the value of the external costs, i e the societal damage costs, and then finding a mechanism for integrating those values into the original decision to choose a technology, along with a mechanism to pay for avoiding these societal damage costs

In 1989, Nevada began to address the issue of placing a value on environmental externalities with Public Service Commission General Order 65 G.O. 65, as it is more commonly known, is the product of extensive research, time, money, and numerous public hearings, with inputs from many concerned parties, on the evaluation of environmental externalities (Docket 89-752). A final Order was issued on February 1, 1991, and G.O. 65 was to be applied to resource plans filed by both SPPC and Nevada Power, the two large investor-owned electric utilities in Nevada

The default values determined by the Public Service Commission of Nevada (PSCN) place a monetary cost on emissions and establish a societal value on reductions in residual emissions (Table 3) These emission values directly affect the least-cost approach to resource planning and choices made in using resources. Fuels that generate emissions are "penalized," while renewables, such as solar, wind and geothermal, are not Using such an approach makes renewable energy resources more competitive with fossil fuel resources

Testimonies by Dr. Robert Weisenmiller and Elizabeth R.Y. Kientzle (PSCN, 1994) (on behalf of the Nevada Geothermal Council) agree that all costs that can be avoided by the presence of the qualifying facilities (QF's) on the utility's system must be included in any long-term avoided cost rates. If energy resources are correctly priced at full costs, including environmental and societal

costs, the utility and rate payers are then able to balance the value they derive from the resource against the cost of these resources. Incorporating these environmental costs in long-term avoided cost rates is consistent with the adopted policies of the State of Nevada This is accomplished by calculating the QF's expected emissions rates and the values set forth in G O 65 The subsequent total price includes the appropriate externality value.

It was clearly stated during these hearings, that while the issues surrounding externalities are at times complex, it is important to rely on the values set forth in G.O. 65. To date no party has presented valid and substantial arguments for excluding environmental costs from avoided costs. In addition, there has never been sufficient justification for discrediting the externality values adopted in G.O. 65. Expert testimony stated this fact in detail to the PSCN. Any defense for ignoring externality costs is based on inaccurate citations from other sources. An example is found in a study by the National Acid Precipitation Assessment Program (NAPAP), which was misquoted and used to discredit externality values The study clearly states

> "Many lakes in the West, especially in the Sierra Nevada and Cascade Mountains, are extremely sensitive to acidic deposition effects. These areas include some of the most dilute and presumably most acid-sensitive lakes found anywhere in the world." (NAPAP, 1990)

While the above citation from the NAPAP study points to the existence of acid rain in our area, this same study was quoted by PSCN staff member Dr William B. Stanley in his testimony. He stated "that acid rain is much less of a problem than had originally been thought" (Stanley, 1993). This statement was used to support SPPC's defense for using values for SO_2 and NO_x that were substantially lower than those stated in G O 65

The option illustrates the "flexibility" of G O 65, it allows utilities to develop their own externality values for emissions Carbon dioxide values were determined on the basis of a literature review, while those for sulfur dioxide, nitrogen oxides, and particulates were taken from the Bonneville Power Administration. The remaining values used were the PSCN default values. To enforce the requirements of G.O. 65, the order can easily be amended and fortified by mandating the use of the specific emission values listed in G.O 65.

On November 9, 1992, the PSCN reopened Docket No 89-752 to evaluate the continued effectiveness in capturing societal values of emissions previously established in G.O. 65. On October 8, 1993, the PSCN ordered Docket 89-752 be closed without revision of environmental values. It was stated that these values reflect the conditions in Nevada, were found to be valid by the PSCN, and should be mandated until there is a ruling concerning the visibility standards for the clean air corridor as pertains to studies associated with Grand Canyon National Park visibility.

Table 3. Comparison of environmental externality values for residual emissions ($/ton valuation)

Source	CO_2	SO_2	NO_2	Particulates	CO	VOC/ROG*	N_2O	CH_4
PSCN	22 0	1,560	6,800 0	4,180.0	920	1,180/5,500	4,140	220
SPPC	2 2	1,500	68.8	166.6	920	1,180/ ?	4,140	220
Difference	19.8	60	6,731.2	4,013.4	0	0/ ?	0	0
PSCN/SPPC %	10	96	1	4	100	100/ ?	100	100

*VOC - Volatile Organic Compounds ROG - Reactive Organic Gases

COMPARATIVE ECONOMICS

A recent study conducted by James H. Caldwell Jr. (Caldwell, 1994), CEERT Technical Director, compared the levelized resource costs with and without the use of societal costs. The calculations were based on coal emissions listed in the California Energy Commission Technology Characterization Report for November, 1993. The geothermal data are based on a range of values supplied by the Nevada Geothermal Council (Caldwell, 1994). Table 4 shows a comparison of a newly established coal fired plant, a gas combined cycle plant, and a geothermal facility.

This method produces a levelized dollars-per-kilowatt-year cost using constant assumptions on the cost of capital, inflation, and miscellaneous values for taxes and book-life of assets. A 15% fixed charge rate and 4% inflation rate were used in the calculations. These numbers are consistent with figures used in a wide range of economic studies and are representative of currently accepted values. Table 5 illustrates the cost of energy in two scenarios for three different power plants. One with the G.O. 65 externality values for emissions and one without. The private costs do not include the damage to society for the emissions produced in the generation of energy by that particular type of facility. The costs of production not reflected in the private cost, i.e. "market cost", are passed on to third parties not involved as consumers or producers of the energy, namely society at large. SPPC references the societal cost in their statement "the value to society in reducing exposure to unhealthy concentrations of pollutants should have a higher value than exposure to lower concentrations" (SPPC, 1992, p.2-6, Volume 5).

Table 4. Comparative costs of electricity from natural gas, coal, and geothermal power plants.

	Gas CC	Pulverized Coal	Geothermal
Installed plant cost, $/kW	500	1,750	2,000-3,000
Operating Expenses			
Fixed, $/kW-yr	9	32	100-175
Variable, $/kW-yr	35	53	35
Fuel Costs, $/kW-yr	263	158	0
TOTAL OPERATING	307	243	135-210

- CC (Combined Cycle)
- Calculations assume a gas price of $3.10/MMBTU, ten year fixed. Data from Caldwell (1994).

Table 5. Levelized resource cost, ¢/kWh.

	Private Costs	Societal Costs
Natural Gas	4.6	5.4
Coal	6.6	8.3
Geothermal	5.5-7.6	5.5-7.6

Data from Caldwell, 1994.

Note to Table 5:
There are two operating geothermal power plants in Nevada that have long-term power purchase agreements with SPPC for less than 5.5 ¢/kWh.

APPLICATION OF GENERAL ORDER 65

Nevada Adopts Clean Power Rule

[April 22, 1991, Stephen Weil, Commissioner, Nevada Public Service Commission]

"On January 27, 1991, the five Nevada Public Service Commissioners unanimously adopted a new rule designed to give appropriate preference to electricity generation which utilizes Nevada's many sources of renewable energy and which provides a cleaner environment. The new rule should result in the expansion of indigenous geothermal electricity generation, the introduction of solar and wind generation in Nevada, and an evolution away from reliance on fossil fuels."

Power plant gains PSC's final OK

[Dec. 20, 1994, Reno Gazette-Journal, By Bill O'Driscoll]

CARSON CITY - Sierra Pacific Power Co. got the final go ahead Monday to build the Pinion Pine gasified coal power plant at Tracy east of Sparks. The environmental permit was granted by the Public Service Commission after more than three years of review. The utility plans to begin construction of the state-of-the-art plant in January or February with operations beginning in late 1996, said spokesman Karl Walquist. Walquist said the utility will seek a rate hike in 1997 for its 262,000 customers in Nevada and eastern California to help recover the cost of building Pinion Pine.

The intent of G.O. 65 was to require the PSCN to give appropriate preference to electricity resources that "provide the greatest economic and environmental benefits to the state (Nevada)." The rule requires the integration of PSCN "default value" externalities for various resource types, as well as the associated economic benefits that may accrue, for all resource options described in the triennial integrated resource plan. Specifically, "in comparing alternate plans containing different resource options, the basic criteria which the utility shall use to select and rank the alternate plans for the supply of power is the Present Worth of Future Requirements for Revenue (PWRR). If an option selected by the utility as its preferred option fails to produce the lowest PWRR, the utility must fully justify its choices by setting forth the other criteria which influenced the utility's choice... ...Another important criterion which the utility shall use to select and rank its options for the supply of power is the Present Worth of Societal Costs (PWSC). The PWSC is obtained by adding the environmental costs (externalities) to the PWRR (PWSC = PWRR + externalities)." The rule further states the "other criteria which the utility shall consider are the avoidance of risk by means of: flexibility; diversity; reduced size of commitments; reducing construction timeframe; reliability and displacement of fuel. The rule also states that "the utility's selections must. provide adequate reliability; be within regulatory and financial constraints; and meet the requirements for environmental protection." The first application of G.O. 65 to a Nevada Integrated Resource Plan (IRP) occurred in July, 1992. SPPC submitted its IRP in July, 1992, and amended it in April, 1993. As required by the PSCN, the Supply Side Plan listed several options for electrical generation for a period of 15 years.

Table 6 shows that the resource mixes for five cases (A through E) chosen by SPPC include the Pinion Pine Project (Pin), combustion turbines (CT), combined cycle (CC), coal, and two types of geothermal projects, both constructed (Geo) and purchased power (PP). A computer model (PROMOD) is used to calculate the PWRR costs (in millions of 1992 dollars) for producing electricity for each case and ranks the cases for 5, 10, and 20 years. At the top of Table 7a, cases A and C, which consist of all fossil fuel generation, receive the highest rank - 1 and 2 respectively, and contain no geothermal energy generation. Case D; which contains about 40% geothermal

Table 6. SPPC Resource Planning PROMOD Cases for Evaluation (SPPC, 1992, after Figure 1-17).

Year	Case A	Case B	Case C	Case D	Case E
1993					
1994					
1995	Pin CT-58MW		CT-133MW	PP-50MW	CT-133MW
1996	CT-133MW	CT-89MW		PP-50MW	
1997	Pin-89MW	CT-133MW	Pin-89MW	PP-122MW	Pin-89MW
1998					Alturas
1999	CT-133MW	CC-125MW	CT-133MW	PP-133MW	PP-133MW
2000					
2001	Coal-50MW	CT-89MW	Coal-50MW	Coal-50MW	Coal-50MW
2002					
2003	CC-125MW		CC-125MW	CC-125MW	CC-125MW
2004		Geo-50MW			
2005		Geo-50MW			
2006	CC-125MW		CC-125MW	CC-125MW	CC-125MW
2007		Geo-100MW			
2008					
2009	CC-125MW	CC-125MW	CC-125MW	CC-125MW	CC-125MW
2010		Geo-50MW			
2011	CT-133MW		CT-133MW	CT-133MW	CT-133MW

Pin=Pinion, CT=Combustion Turbine, CC=Combined Cycle, PP=Purchase Power, Geo=Geothermal

generation, received the lowest ranking, 5. When the PWRR value (1,077), is added to the appropriate externality value (EAA = 772) the result is the PWSC (1,849). When PSCN recommended default values are added to produce a PWSC for all cases, the rankings are nearly reversed; the lowest ranking case D is ranked 1, while the previously highest two Cases, A and B, received the lowest rankings, 4 and 5. A subsequent evaluation of the cases using SPPC recommended environmental externalities (Table 7b) produces the original configuration - cases A and C are ranked 1 and 2. The SPPC values appear to be based solely on health impacts from combustion and may not fully account for "upstream" impacts, such as mining and transportation of fossil fuels. This clearly demonstrates that when PSCN externality values are applied, the resulting PWSC values for resource cases with geothermal energy produce the lowest cost energy. On the other hand, when SPPC is provided the flexibility to use its own externality values, the intent of G.O. 65 is defeated and the value of the regulation is lost.

In spite of these positive attributes for geothermal energy, SPPC ultimately selected Case A as the preferred plan and the PSCN approved the Pinion Pine Power Plant. The PWRR costs for Case A, which included Pinion Pine, were lower only because the U.S. Department of Energy agreed to provide 50% of the construction costs and 50% of the operating and fuel costs for the first four years of operation. SPPC did not acknowledge the PSCN default values as producing a lower cost, but stated instead that the PWSC values for cases A and C were favored using their own externality values. Case D, which contained 40% geothermal was summarily dismissed from further evaluation because it depended too much on one technology and posed too much uncertainty of resources. SPPC tracked the expected output vs. the actual output for seven geothermal generators in 1991. They found that "the actual performance during peak hours was less than the contracted amount by 18.9% during December and 28.9% during the July peak hours."

Table 7a. Effects of PSCN externality adders on SPPC PROMOD (SPPC, 1992, after Figure 1-18).

	A	B	C	D	E
PWRR 5yr	1,077	1,073	1,079	1,086	1,079
PWRR 10yr	2,044	2,044	2,046	2,138	2,069
PWRR 20yr	3,269	3,311	3,271	3,392	3,301
Ranking @ 20yr	1	3	2	5	4
EEA Def. 5yr	772	772	772	757	772
EEA Def. 10yr	1,262	1,264	1,262	1,120	1,196
EEA Def. 20yr (=PWSC-PWRR)	1,834	1,172	1,833	1,516	1,654
PWSC Def. 5yr	1,849	1,845	1,851	1,843	1,851
PWSC Def. 10yr	3,306	3,308	3,308	3,258	3,265
PWSC Def. 20yr	5,103	5,083	5,104	4,908	4,955
Ranking @ 20yr	4	3	5	1	2

EEA = Environmental Externality Adder, Def. = Default, Rec. = Recommended, Values in 1992 $M

SPPC's revised IRP (April, 1993) does not specifically identify geothermal power as an option in any of the four cases they evaluated. Purchased power is identified as an option for two cases, but the preferred plan contains no geothermal power purchases. It should be noted that in their July, 1994 Integrated Resource Plan, Nevada Power included the PSCN default values, as well as their own recommended externalities.

It is clear that the implementation of G.O. 65 has fallen far short of expectation by its supporters. There are three major areas of concern.

1. Flexibility allows the utility to provide the results of its own environmental externalities. This may constitute a conflict of interest since in this particular situation, the utilities best interests are served by constructing a fossil-fuel power plant and adding those costs to the rate base. SPPC

Table 7b. Effects of SPPC externality adders on SPPC PROMOD (SPPC, 1992, after Figure 1-18).

	A	B	C	D	E
PWRR 5yr	1,077	1,073	1,079	1,086	1,079
PWRR 10yr	2,044	2,044	2,046	2,138	2,069
PWRR 20yr	3,269	3,311	3,271	3,392	3,301
Ranking @ 20yr	1	3	2	5	4
Rec. 5yr	97	97	96	95	97
Rec. 10yr	148	149	148	135	142
Rec. 20yr (=PWSC-PWRR)	180	177	180	156	169
Rec. 5yr	1,174	1,170	1,177	1,181	1,176
Rec. 10yr	2,192	2,193	2,194	2,273	2,211
Rec. 20yr	3,499	3,488	3,451	3,548	3,470
Ranking @ 20yr	1	3	2	5	4

All values in 1992 $M's.

has also indicated that "the financial effect of purchased power is a reduction in financial flexibility." The environmental externalities should be calculated by an independent agency and only those values should be used in the IRP.

2. If the intent of G.O. 65 was to give appropriate preference to alternative, non-polluting, indigenous resources, then the environmental and economic parameters of alternatives should be compared directly with fossil-fuel options. SPPC's method is to lump all generation options together and compare the totals. The net effect is to bury the contribution of each type of generation and obscure the individual environmental and economic impacts.
3. The most serious flaw, however, is that in spite of the outcome of the PWSC, the primary criteria is the PWRR - the lowest cost without the use of externalities. The utility is required to provide the calculations, but is not required to implement PWSC values. G.O. 65 has, regrettably, assumed the position of a regulatory annoyance, and little more.

RENEWABLE ENERGY BENEFITS

The most promising alternative energy technologies include solar, wind, and geothermal power, which were extensively developed in response to the petroleum embargo and energy shortages of 1973. Alternative energy resources were identified as a way to preserve indigenous petroleum resources and ensure future energy supplies. Based on 210 MWe produced by Nevada's geothermal power plants in 1993, an equivalent of 821,100 tons of coal, 3,066,000 barrels of oil, or 18,396,000 million cubic feet of natural gas were conserved (Goddard et al., 1989). The actual economic advantage of these alternative energy resources cannot be fully evaluated without considering the environmental benefits all three have over conventional fossil-fuel plants. This report addresses the geothermal option.

The purpose of G.O. 65 was to provide a systematic methodology for the evaluation of a variety of fuels used in the generation of electricity. By mandating the use of G.O. 65 criteria in renewable resources (solar, wind, and geothermal) can compete on a "level playing field" with conventional (coal, gas, and oil) fuels.

Air Quality and Visibility

Geothermal resources produce no nitrogen oxides, negligible emissions of particulates, 90 percent less sulfur oxides and 60 percent less carbon dioxide, the principal constituent of the "greenhouse gases," than fossil fuels (Brown, 1994). It has been estimated that the use of geothermal resources reduces carbon dioxide emissions by a factor of about 2000, compared with the "average" U.S. coal-fired plant using 1990 emissions data.

Table 8 lists the tons of various pollutants that were not produced as a result of the 210 MWe of geothermal electric power. In addition to reduced emissions, the utilization of renewable energy enhances visibility, eliminates conditions that lead to acid precipitation, preserves endangered species in terrestrial and aquatic ecosystems, and reduces hazardous wastes.

Under a 1990 Congressional Order (Nevada Ad-Hoc, 1994), the Clean Air Act was amended to address visibility impairment in an area of National Parks, Monuments, and Wilderness Areas. This area is known as the "Golden Circle of Parks," and includes the Grand Canyon and 14 nearby National Parks and Wilderness Areas (Figure 3). Recommendations designed to improve the poor

Table 8. Tons of pollutants NOT emitted in 1993 (per 210 MWe Nevada geothermal power plants).

Pollutant	Coal	Oil	Natural Gas
CO_2	1,785,000	1,407,000	951,500
NO_x	315	315	90
SO_x	11,000	10,000	10

(after Goddard and Goddard, 1989)

air quality will be forwarded to the Grand Canyon Visibility Transport Commission (GCVTC), which consists of Governors from states in the Grand Canyon airshed region and federal land management agencies.

The Commission has been tasked to identify possible impacts and to recommend to the EPA solutions which may ultimately reduce air pollution in the Golden Circle. The Golden Circle is the target of the Commission due to the proximity of the Clean Air Corridor, which is defined as a flow of "clean" air from the transport region (i.e. Nevada) that helps remove pollutants from the Grand Canyon area. If a recommendation by the Commission for regional caps on emissions is mandated, there would be an increased usage and applicability for emission credits in Nevada. Emission credits are incentives that allow each pollution source to receive a pollution allocation. The source is then responsible for determining how to keep emission levels within the allocation. A regional cap would theoretically be kept at current levels of emissions, or lower.

The potential impacts to Nevada from mandates concerning the "Golden Circle" may place severe limits on polluting industries by restricting the expansion of fossil fuel fired facilities or by requiring further compliance with stricter emission standards. These changes would not only affect new industries, but also the existing industries by discouraging construction of major sources of emissions within the clean air corridors, even if existing air quality regulations are met by the power plants.

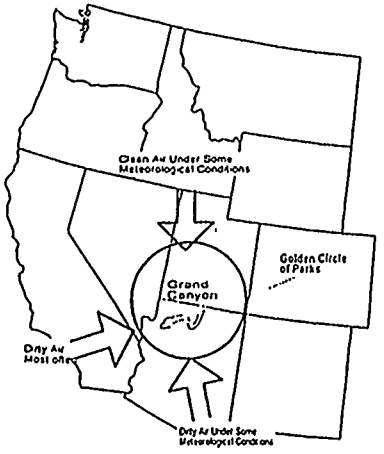


Figure 3. "Golden Circle of Parks," where air quality is a critical concern.

Many utility operations, both proposed and expanding, would have to be scrutinized as to their contracted sites, alternative sites, size of operation, production processes, and environmental control techniques in order that they be able to demonstrate the need for the proposed operation or expansion, and that it is sufficient to out-weigh the environmental and social costs that will be imposed. If these conditions are not met, the utility will have to justify its existence in any non-attainment area or area of concern, such as the clean air corridor, even though it must first demonstrate that no additional deterioration to the area's air quality will occur.

Any state that fails to achieve the attainment goals of the National Ambient Air Quality Standards (NAAQS) and the Secondary Ambient Air Quality Standards (SAAQS) will face financial and other

sanctions by EPA and the Department of Transportation. This may require any state that does not meet the mandated clean air standards to curtail any plans for industrial growth to maintain a "no net increase" in air emissions.

The benefits of renewable energy are often not captured in standard economic accounting procedures. For example, renewable energy production provides social and economic development as well as employment opportunities, especially in rural areas, that otherwise have limited opportunities for economic growth. Renewable energy development can thus help reduce poverty in rural area and reduce pressures for urban migration and the continued taxing of urban social institutions. Power plants, including geothermal, tend to be rurally located. Benefits realized by counties with geothermal power plants will increase as the demand for renewable energy increases.

Resource planning based on internalizing the societal costs of emissions places geothermal and other renewable resources in direct competition with coal and natural gas utilities, even if the least cost analysis is considered. The values used for the emissions of NO_X, SO_X, reactive organic gases (ROG), particulate matter (PM), and CO_2 are of concern because they are commonly produced from the combustion of fossil fuels. On the other hand, all of these emissions are nearly absent in renewable resources.

Economics

Historically, renewable energy sources have been perceived as being non-competitive with fossil fuels. Coal and natural gas are plentiful and there are large federal subsidies for fossil fuel combustion technology. Recently, however, energy production costs for renewables have fallen and are expected to decline further as manufacturing technologies allow mass-production of critical components. Many utility companies recognize the value of including renewables in their resource mix. Geothermal energy, for example, is included in many utility energy portfolios along with fossil-fuels in California, Nevada, Hawaii, and Utah. Long-term, fixed-price power purchase agreements protect utilities and consumers from price volatility and supply interruptions associated with fossil fuels.

In 1992, Nevada produced 1,219,700 Megawatt hours (MWh) of geothermal electricity. That equals a sales volume of about $85 million dollars, based on a net production of 1,034,800 MWh. In addition to this revenue, federal geothermal leases on 348,000 acres generated rent and royalty fees of $2,926,200, according to Bureau of Land Management reports (Hoops, 1994, pc).

Nevada enjoys economic benefits that transcend energy production, but are attributed directly to geothermal utilization. Mining, aquaculture, and agriculture all benefit from geothermal resources. The Elko County School District and the Elko Heat Company operate geothermal district space heating systems that provide hot water to municipal, residential, and commercial establishments. Service has been provided to Elko since 1982 and currently services approximately 20 buildings. Approximately 250 homes and businesses in Reno use geothermal energy for space heating. The Warren Estates subdivision in Reno supplies hot water to more than 100 private homes from a single geothermal well.

Nevada also benefits from the use of renewable resources, especially geothermal, as evidenced by the various revenues earned from geothermal operations. The Nevada Department of Taxation, Division of Assessment Standards, reports that net proceeds tax, property tax and county tax payables have increased for geothermal plants throughout the State, especially in rural areas such

as Churchill County (Table 9). Figure 4 illustrates the benchmark events and historical development of geothermal energy in Nevada.

Renewables were selected as the fuel of choice over fossil and non-fossil utility plants during recent bidding for additional power in California (CPUC, 1993). This emphasizes the ability of renewables to be an effective means of cost effective resource diversity and improved environmental quality. There has been a perception that California's higher utility costs are in part due to their "set aside" policy. California's rule requires that a portion of the utility's infrastructure be "set aside" for renewable resources. Sara Steck-Myers (1994, pc), attorney for CEERT, has directly addressed this unfounded belief by pointing out that "set asides" do not result in higher utility costs. In fact, the statute was enacted in 1991, and to date it has yet to result in power purchases by the states electrical utilities. Therefore no costs have been incurred and no rate increases for utility customers have resulted.

Renewable energy becomes even more economically attractive, and therefore more desirable, over traditional fuels when considering the radioactivity released from burning coal. In a study completed by Oak Ridge National Laboratory for the U.S. Environmental Protection Agency (EPA), it was reported that an average ton of coal contains 1.3 ppm of uranium and 3.2 ppm of thorium (Science News, 1994). Both of these trace metals occur naturally and both are radioactive. Researchers estimated that in 1982, U.S. utility generating plants combusted 616 million tons of coal, releasing 801 tons of uranium and 1,971 tons of thorium to the atmosphere.

Fuel Diversity

Fuel supply diversity is another attractive benefit of renewable energy. This relates to the substantial interregional energy trade in a renewable-intensive energy future, involving a diversity of energy carriers and suppliers. Energy importers would be able to choose from more producers and fuel types than they do today. If G.O. 65 PWSC becomes the primary consideration, renewable energy sources could compete directly with coal, substantially reducing the vulnerability of the energy market to monopoly price manipulation or unexpected disruption of supplies. Such competition would stabilize energy prices. The growth in world energy trade would also provide new opportunities for energy suppliers, especially the prospects for trade in renewable fuel. Compare this to the 540 tons of nuclear fuel used in 1982 by the countries 111 Nuclear plants to generate electricity.

Table 9. Revenue and taxes received from geothermal operations in Nevada.

Year	Actual Gross Proceeds	Actual Net Proceeds	Actual County Tax	Property Assessed Value	Property Taxes Due
1989	$58,876,628	$18,114,494	$345,516	$63,134,750	$1,342,691
1990	$68,003,694	$28,133,212	$631,253	$53,105,610	$1,258,415
1991	$74,253,212	$29,570,221	$694,578	$57,328,100	$1,400,386
1992	$82,814,226	$35,602,681	$864,815	$60,957,720	$1,990,902
1993	$102,164,450	$37,432,245	$827,645	$68,211,000	$1,656,424

Data Source: Nevada Department of Taxation (NDT, 1994).

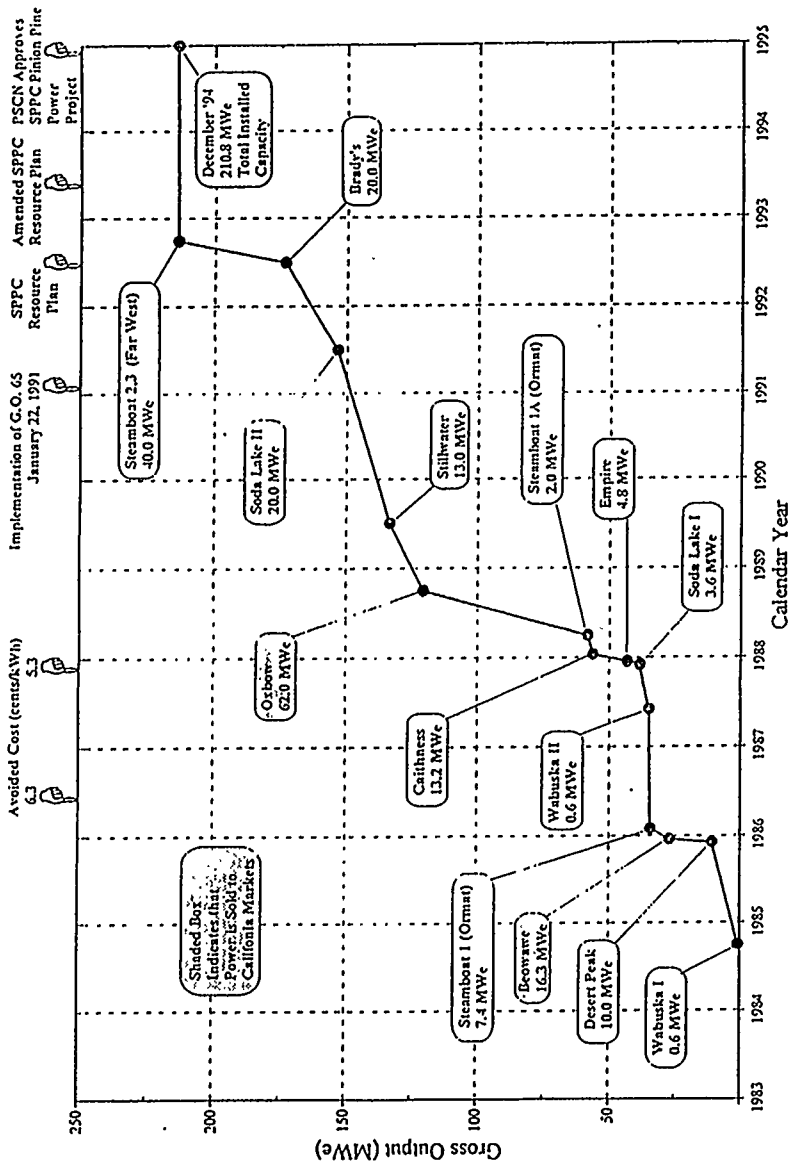


Figure 4. Timeline of Nevada geothermal development showing plant on-line dates and size, as well as significant regulatory events.

CONCLUSIONS

Designing a dependable and stable energy future for Nevada requires that utilities and independent power producers adhere to the most prudent residual emission values designed for the prevailing atmospheric and meteorological conditions. The present flexibility in G.O. 65 in allowing pollution sources to choose "appropriate" values denigrates the work of the PSCN, and adds unnecessary confusion to regional efforts to reduce levels of pollution. Selecting emission values significantly lower than those recommended by the PSCN sidesteps the intent of G.O. 65. Finally, the selection of fossil fuels for electric power generation brings with it the issue of price volatility as well as the issue of future regulatory uncertainties. The selection of renewable energy resources, particularly geothermal energy, completely addresses the air quality issue, satisfies the price stability issue, provides adequate dependability, and at a cost effective price.

Legislation has been proposed that is a direct response to Senate Concurrent Resolution No. 35 (SCR 35) which addresses the sustained orderly development of renewable energy resources for Nevada's utilities. It is believed that preservation and the improved environmental conditions are parallel objectives with resource diversity, mitigating risks associated with Nevada's continued dependency on fossil fuels to generate its electricity.

Incentives must be developed that guarantee the resource options are not only low-cost, but include the least cost to society. This diversification will allow the development of renewable resources on a cost-effective method. Utilities must use the values set forth in G.O. 65 as they have been determined and reviewed for their applicability to the state. These values set a price for the societal cost of damages to the environment due to emissions and should represent the primary criterion for resource planning.

Further incentives for utilizing renewable resources are provided by the use of set-asides that ensure timely development of renewable energy resources. The policy as it is presented establishes a minimum of 50% of the capacity purchased by the utilities be set-aside for renewable energy resources

Although it is too early to develop a complete strategy for restructuring the entire utility industry, some principles are becoming evident. The focus: a competitive market for power generation; open access transmission system; incentives for reliance on a diverse array of power supplies; and development of a service- rather than commodity-oriented local distribution system committed to demand-side management and valuing the environmental benefits of geothermal power and other renewable technologies. If these paths are followed, a truly competitive, ecologically sustainable power system can be develop and sustained for future generations. The existing structure of the electric utility industry is supported by government agencies and powerful economic interests. However, in order to meet today's economic and environmental imperative, a restructuring of the industry is imperative.

General Public Comment Set 43

RECEIVED MAY 1 5 1995

5-12 95

Ms Julie Halligan - C.P.U.C.
Mr. Peter Humm - BLM
c/o Aspen Environmental Group

Dear Ms Halligan & Mr Humm,

I am writing this to formally protest the Altusas 345 KV Powerline. I live in Horizon Hills north of Reno & basically this powerline will be in my front yard. The thought of this monstrosity obstructing my pristine view of Peavine Mt greatly troubles me.

There are other concerns I have about this project

1. my view
2. my health - Electro Magnetic field cause cancer. (GP. 43-1)
3. my property value - I m sure this would have a negative effect on that.
4. The wildlife that live next to me - many bird, & four legged creatures

Basically this powerline would impact ~~Any~~ mine & many other peoples lifestyle. If it must be built I suggest you put it some where that it doesnt impact so many people. I like my home & its location. This powerline just doesn't fit in. (GP. 43-1)

Sincerely

Judy & Stephen Thomas
8495 McHaw K Ln
Reno NV 89506
(702) 677.0561

General Public Comment Set 44

1335 Hage Rd.
Reno NV 89506
May 7, 1995

Dear Mr. Hansen,

We're writing to protest the projected power lines across Peavine Mountain. Since we live directly adjacent to the area that is used for recreation, we already have one power line next to our property. Our dismay when we realized these poles would not be buried someone undoubtedly decided.

The proposed lines will not only threaten the view but may take out some of the pine groves that help make it up. We had a call this morning from friends who want to go on a flower walk tomorrow. I've been out already this spring with a man who collects and sells native seeds, with a group of graduate students, with a grandson and grandnephew, and by myself.

This area is heavily used, which wasn't the case when we moved here over thirty years ago, but the Forest Service tries to protect it. There is some abuse from cars driving off the road and always those who leave trash, but the mountain bikers seem a responsible group - and there are lots of them. I don't know what effect the electromagnetic field would have on people like them who don't linger under it. Peavine is important to the whole region, not just because the melting of the last snow is the signal for planting tomatoes.

GP. 44-1

GP. 44-1

Sincerely,

Shirley Backman
Carl M Backman

May 1st, 1995

Mr. Pete Humm
Bureau of Land Management
Susanville District
P. O. Box 1090
Susanville, Ca 96130-3730

General Public Comment Set 45

Dear Mr. Humm,

I sincerely hope the BLM will not allow Sierra Pacific Power Co. to build a major transmission line north along U. S. 395 from Reno to Alturas.

This is a beautiful area along the wetlands and the Sierra. There is something about natural unspoiled scenery that is worth far more than an oversized steel and wire transmission line and the new development it will bring.

We seem to end up destroying the natural environment which is the very reason people have moved to this area in the first place. These lines are even an eyesore across the desert where development and access are minimal. At the very least the line should be placed in existing corridors where the impact to the public would be reduced. GP. 45-1

If this line goes in as proposed, I feel something will be lost which cannot be regained in the foreseeable future.

I urge the BLM to oppose this proposed transmission line.

Very truly yours,

Richard W. Hewitt

Richard W. Hewitt
1936 Topeka Cir.
Sparks, Nv 89434

5-13-95

HARRISON G. BARDSON
2455 SENECA DR.
RENO NV. 89506
(702) 972-0844

General Public Comment Set 46

RECEIVED MAY 17 1995

FORMAL PROTEST OF THE ALTURAS 345 KV POWERLINE CPUC APPLICATION NUMBER 93-11-018 AND BLM CASE NUMBER CACA-31406

MS. JULIE HALLIGAN
MR. PETER HUMM

THIS POWER LINE IS VERY CLOSE TO MY HOME, I WAS NOT INFORMED OF THIS POWER LINE BY S.P.P.C., I NOW UNDERSTAND WHY. (GP. 46-1)

THE IMPACT THIS LINE WILL HAVE ON MY LIFE IS OVERWHELMING.

THE VIEW OF PEVINE MT., THE NOISE THIS LINE WILL GENERATE.

THE LOSS OF WILDLIFE, WE HAVE AN ACTIVE GOLDEN EAGLE !! NEST WITHIN 100' OF THIS LINE, AND A POND WITH FISH, NOT TO MENTION ALL THE OTHER WILDLIFE THIS MT. SUPPORTS. (GP. 46-2)

MY HEALTH, I SPEND MUCH TIME ON THIS PART OF PEVINE MT. (EMF-GENERATED).

S.P.P.C. MIND IS MADE UP ON THIS ROUTE, BECAUSE IT IS THE CHEAPIST WAY TO GET POWER FROM ALTURAS TO RENO. THAT IS NOT A REASON TO APPROVE THIS LINE.

S.P.P.C. NEEDS TO LOOK AT MANY OF THE MORE PRACTICAL WAYS TO BRING POWER IN FOR THE LARGE MINES IN NV. (GP. 46-2)

I HOPE YOU CAN HELP PRESERVE THE BEAUTY OF NV. + CA.

THIS POWERLINE IS OUT OF LINE

THANK YOU

Harrison Bardson

5-15-95

DENNY'S
DEPENDABLE AUTOMOTIVE
291 Washington Street • Reno, Nevada 89503
(702) 322-1012

RECEIVED MAY 17 1995

Julie Halligan / Peter Hamm
CPUC / BLM
c/o Aspen Environmental Group

General Public Comment Set 47

Dear Ms. Halligan and Mr. Hamm,

On behalf of myself, my husband, my son and my neighbors I want to go on record to support the Environmental Superior route of the power lines from Alturas, Ca. to Reno, Nv. as was stated in the original draft. (GP. 47-1)

We, the people of Sparks do not want any powers lines thru our city.

Thank you.

Sincerely,

Lea Neilson McMullen
9.50 Vintage Hills Blvd.
Sparks, NV. 89436

5-13-95

RECEIVED MAY 17 1995

Marguerite Perez
2455 Seneca Dr.
Reno NV 89506

Ms Halligan and Mr Humm

General Public Comment Set 48

This is a formal Protest against the ALTURAS 345KU Powerline # 93-11-018 and Blm Case # CACA 31406

I protest on these grounds:

1.) My health and the health of my family

2.) The visual impact this project will have from my property and the officially designated Scenic route from Bordertown to Reno on US 395. (GP 48-1)

3) The impact this powerline will have on our property values. We cannot afford to take a 20% loss!

4.) The affect this Powerline will have on our overall lifestyle. this includes walking the dogs, hiking and enjoying the overall beauty of our PUBIC BLM Lands.

I can't belive Sierra Pacific Power Co. won't consider using other alternatives! If they have to build this Power line please persuade them to do it right for you me and all the people living and visiting beaulifol Northern Nevada (GP 48-2)

Thank You
Marguerite Perez

May 5, 1995

RECEIVED MAY 17 1995

General Public Comment Set 49

Julie Halligan - Peter Humm
CPUC - BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC 93-11-018, BLM CACA 31406.

Dear Mr. Humm and Ms. Halligan,

On page C. 13-34 of the DEIR, the visual impact of the Project coming off the predominant point north of HWY 299 was identified as a Class 1 Impact. This area has also been identified as a key area of concern by the Modoc County Board of Supervisors (May 2, 1995 meeting), the Modoc County Planning Commission (March 8, 1995 and April 14, 1995 meetings), and the public (scoping letters and comments). The DEIR, however, did not identify mitigation that would reduce this impact to a less significant level. Mitigation that would reduce this impact from an unacceptable Class 1 level would be:

#1 burial of the line
#2 avoidance of the ridgeline

GP. 49-1

Alternatives to lessen this impact were not explored. Underground construction was only considered in general terms in the DEIR on pages B.68 - B.69. It was addressed only in burial of the entire line and was inappropriately dismissed due to expense. It IS feasible to bury this transmission line shorter distances (less than 25 miles) and according to NEPA, expense is not an appropriate reason for dismissing this alternative. Due to the lack of canyons and ridges and the fact that the ground has already been previously impacted, Alternate B and the USFS Alternate offer reasonable segments where the line could be buried. Other Class 1 Impacts would not be generated, as evidenced by the Tuscarora Gas Line Project (similar terrain).

Avoidance of ridgelines represents common sense, and yet alternatives were not sought out to lessen this impact.

Sincerely,

Kelle S. Ray

Kelle S. Ray
P.O. Box 786
Alturas, CA 96101

RECEIVED MAY 1 7 1995

May 6, 1995

General Public Comment Set 50

Julie Halligan/Peter Humm
C/O Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE Alturas Intertie (CPUC 93-11-018)
BLM (CACA-31406)

Dear Ms. Halligan and Mr. Humm,

The cumulative impacts of combining telecommunication (fiber optics) with the Proposed Project were not appropriately addressed in the DEIR. It stands to reason that cumulative negative impacts on Daggert Canyon and the area west of Alturas would result from bringing the fiber optics from the Project to the city of Alturas. This was completely disregarded in the DEIR and should have been addressed in depth. GP. 50-1

Sincerely,

Billy & Marlene Roberts

Billy & Marlene Roberts
P.O. Box 2014
Alturas, CA 96101

Date: May 15, 1995

RECEIVED MAY 1 7 1995

To: Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, STE 218
Agoura Hills CA 91301

From: Dave Stampanoni
5561 Lower Wyandotte Road
Oroville CA 95966
(916) 533-1370

General Public Comment Set 51

Re: Alturas Transmission Line Project
CPUC #93-11-018 ; BLM # CACA-31046

To Whom it may concern,

Thank you for the opportunity to respond with comments about the project.
I am a land owner near the Secret Valley rest area along Highway 395 and I do have interest with concerns about the project. My concerns are mainly :

1. The location of the towers
2. The safety of the towers
3. The affect of the towers on wildlife
4. The use of the power

My concern in the location of the towers is mainly that they wouldn't be in the middle of my property, but rather along the border. The parcel I have has telephone lines at the southwest corner and they run north and south. I would prefer that they be in this area. GP. 51-1

The safety is an issue because I have three young boys. I would hope that the towers could not be easily accessed. What precautions are there about vandalism or gunfire. How often are the towers and lines inspected. GP. 51-2

I am not an activist on environmental issues but, I have heard that birds and other wildlife are affected by the towers and lines. For birds, I have heard that a perch can be placed at the top for them to land and I think that is a good idea. These towers have been around for years without causing wildlife to be put on an endangered species list, so except for a few unlucky ones, I feel that animals do make adjustments, but if there are any simple ways for animals to be safe, lets implement it. GP. 51-3

Hopefully the lines or towers will be designed and planned for the duel purpose of being tapped for general use. I have seen towers with both transmission power and lower voltage on the same poll a little lower down. It would be a real shame to have all that power so close and not be able to use any of it. To my knowledge, right now, the closest power to me is Spanish Springs, about 4 miles away. GP. 51-4

Talking to some others, it seems they would prefer to keep things just the way they are, but I have always thought that some development is needed in that halfway point between Susanville and Alturas, and that usually starts with accessible power.

Sincerely,

Dave Stampanoni

RECEIVED MAY 19 1995

15 May 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills CA 91301

General Public Comment Set 52

Dear Ms. Halligan and Mr. Humm:

I was unable to attend the recent hearing in Reno but am informed about several aspects of the Alturas Transmission Line Draft Environmental Impact Report/Statement and would like to comment on it.

First, of primary concern to me is the visual impact on Rancho San Rafael Regional Park, which will be very great and very injurious. While the present line runs just north of Park property, the parcel through which it runs, it is hoped, will be part of Rancho San Rafael within a year. To have such huge poles running through the jewel of the urban parks in the Truckee Meadows would be disturbing to many people because it would mean a permanent reduction in the visual features of the Park. Its beauty is a major reason why it is such a valuable common possession to the residents of Washoe County.

You may not be aware that there have been extensive struggles over the future of this Park, involving the most elaborate consulting of the opinions of Washoe County citizens on any question which I have seen in more than 30 years as a resident of the area. In processes which twice led to the adoption of Master Plans for the Park, it became abundantly clear that most concerned citizens want Rancho San Rafael to remain a place mainly of open spaces and natural plantings. Poles 130 feet high which will be visible from all over the Park hardly fit into this category. GP. 52-1

It seems to me also that visually the objection to the transmission line is as strong if the parcel on which it is built is not added to the Park as if it is. The line is planned to run very close to the present boundary of the Park. Moreover, it will be built through a high part of the Park (whether it is within the Park boundaries or not). It will not be possible to ignore the line from the rest of the Park; its presence will be aesthetically harmful to Rancho San Rafael even if it is not on Park property.

Second, I have some concerns over the health hazards to the housing area just south of the transmission line and between Rancho San Rafael Park and Virginia St. I have a very good friend who lives there but am also concerned about others I do not know. GP. 52-2

It is my understanding that while the issue is in dispute, there are grounds to suspect that high-voltage transmission lines can increase the incidence of some kinds of cancer among people living close to them. I assume the degree to which this danger exists is related to the amount of voltage carried by the lines. The proposed transmission line will carry a voltage as high as any line in this area and much higher than any but one other line, if I am correct, and consequently will be more dangerous than lines which carry electricity at smaller voltages. GP. 52-2

There is also a conceptual question of how much danger from this source is reasonable. In my view, the line should not be built unless very strong assurances can be made that it will not increase the risk of cancer at all: even one cancer case resulting from the line is too much. My wife has had breast cancer and we have a transformer box in our front yard: the thought that she might not have had this cancer without the box, even if the chances are small that this is the case, does not please us.

Third, I have been told that the chief purpose for the line is to bring in additional electrical power chiefly for mining activities further east in Nevada. If this is the case, could the line not be placed north of the planned route, through unpopulated areas where health and visual pollution problems would be lessened or nonexistent? Sierra Pacific has stated publicly that it needs to bring in more electrical power as the area grows, but if the need is primarily for nonurban uses, why bring a high-voltage line into the metropolitan area? If it is necessary to build new facilities outside the metropolitan area to serve the mines, why cannot they be built outside the cities and why cannot the mines pay for these facilities? GP. 52-3

Finally, I believe there must be thorough examination of the alternatives of burying the transmission line (or lines if the problem is that a single high-voltage line cannot be buried). I would personally be willing to see modest increases in my electricity bill to see such lines buried and think many others would too. At any rate, this issue needs to be explored thoroughly in your final report. GP. 52-4

The proposed transmission line is of major importance to this area; I hope that it can be built in ways which will not have the adverse impacts which have been mentioned above as possibilities. It would be very unfortunate to have such a very large line brought in at costs which large numbers of people already living here find unacceptable.

Sincerely,

Elmer R. Rusco

Elmer R. Rusco
3665 Pomo Dr.
Reno NV 89503
702-747-6727

c G. Sullivan
B. Albright
P. L. Bowen

RECEIVED MAY 2 2 1995

FIRST CENTENNIAL TITLE COMPANY OF NEVADA
530 E. PLUMB LANE
P. O. BOX 10538 • RENO, NEVADA 89510
Phone: (702) 689-8510 • Fax: (702) 689-8520

General Public Comment Set 53

May 15, 1995

Ms. Julie Halligan
California Public Utilities Commission
Mr. Peter Humm
Bureau of Land Management
c/o Aspen Environmental Group
20423 Canwood St. #218
Agoura Hills, Ca 91301

Re: Formal Protest of the Alturas 345 KV Powerline
CPUC Application Number 93-11-018 and BLM Case Number CAC 31406

Dear Ms. Halligan and Mr. Humm:

Please be advised that I am writing to you as a resident of Horizon Hills Subdivision, located approximately 8 miles north of Reno, at the base of Peavine Mountain, which is adjacent to the proposed Alturas Intertie.

We are a very small subdivision, comprised of approximately 167 lots, most of which have been improved, living a very quiet lifestyle. Raising our children in a Country atmosphere, where we all have walked, rode our horses and gone 4 wheeling over the Mountains of Peavine.

I am very concerned about the possible health hazards that your proposed line may create as well as the visual impact that will be felt for many miles around. GP. 53-1

Your proposed line will be approximately 2000 feet from our Community water tank, which is our only source of water for our Subdivision. What about that health hazard?

We are all concerned about the possible devaluation of our properties. Several residents, whose homes are up for sale have indicated that they have already had to reduce their sales price do to the possibility of your line being installed so close to our subdivision.

Many of the residents in our area have VA Loans on them. When you have that type of loan, VA will loan normally 100% of the sales price plus the VA funding fee. For example, if the sales price of a home is $100,000.00 the loan amount would be approximatley $102,000.00.

If a homeowner cannot make a profit or sell their home for what is at least owed on the loan, more times than not, they will let the property go into Foreclosure. Are you aware that in our State that a Beneficiary can secure a deficiency judgement against their Borrower, after a Foreclosure sale has occured. What about the financial impact?

I understand that Mayor Breslow, Mayor of Sparks, has stated that if you went through his area they would have to destroy approximately 68 homes and well as the tremendous impact that would be felt on City of Sparks. Also, according to the newspaper he indicated that what you are proposing is big and ugly and that they do not want it in the City of Sparks. Well, neither do we. GP. 53-2

I am not opposed to progress nor to any individual or company earning a profit on their product or service, but not at the expense of others. The State of Nevada has many wide open places that would accomodate your project as well as other existing corradors.

I feel that our environment will be severly affected, the beauty of Peavine would be destroyed and a lifestyle, of which we have become accustomed to, would be gone forever.

Respectively yours,

Carole L. Bohn
8390 Chippewa Avenue
Reno, NV 89506

cc: Governor Bob Miller
Mr. John Mendoza
Mr. Scott Nebesky
Mr. Roger Olack
Mr. Steven Younkin
Mr. Mike Reed
Mr. Bill VanBrugann
U.S. Fish and Wildlife
Senator Richard Bryan
Senator Harry Reid
Congresswoman Barbara Vucanovich
Senator Bill Raggio
Assemblywoman Joan Lambert
Mr. Jim Shaw
Mr. Steve Bradhurst
Mr. Grant Sims
Ms. Joanne Bond
Mrs. Lori Burke
Mrs. Jan Loveran
Washoe County Planning Commission Development Review
North Valley's Citizen Advisory Board

RECEIVED JUN 16 1995

June 12, 1995

Ms. Julie Halligan
California Public Utilities Commission
Mr. Peter Humm
Bureau of Land Management
c/o Aspen Environmental Group
20423 Canwood St. #218
Agoura Hills, Ca 91301

Re: Formal Protest of the Alturas 345 KV Powerline
CPUC Application Number 93-11-018 and BLM Case Number CAC 31406

Dear Ms. Halligan and Mr. Humm:

Please be advised that I am correcting my letter dated May 15, 1995 in which I inadvertently wrote my views on the Company letter head, which is First Centennial Title Company.

The views that I expressed were mine only and were never intended to involve my employer or any other employee of First Centennial Title Company.

Please accepty my sincere apology if by using the Company letterhead had given any wrong impressions. It certainly was not meant to give any false impressions, only my opinion.

Respectively yours,

Carole Bohn
8390 Chippewa Avenue
Reno, NV 89506

RECEIVED MAY 2 0 1995

JULIE HALLIGAN/PETER HUMM
CALIFORNIA PUBLIC UTILITIES COMMISSION
BUREAU OF LAND MANAGEMENT
C/O ASPEN ENVIRONMENTAL GROUP
30423 CANWOOD ST., SUITE 218
AGOURA HILLS, CA. 91301

General Public Comment Set 54

MAY 18, 1995

DEAR MS. HALLIGAN AND MR. HUMM,

MY HUSBAND AND I HAVE LIVED AT 1346 SATELLITE COURT, SPARKS, NV. 89436 FOR 7 YEARS AND HAVE ENJOYED TREMENDOUSLY LIVING HERE IN THIS SPECIAL AREA OF SPARKS. WE LOOKED FOR 6 YEARS FOR THIS WONDERFUL SPOT FOR OUR RETIREMENT. EVEN THOUGH WE ARE ONLY IN OUR 50'S, THIS HOME WAS TO BE OUR FINAL HOME!

WE VEHEMENTLY SUPPORT THE ENVIRONMENTAL SUPERIOR ROUTE IN THE ORIGINAL DRAFT. WE THE PEOPLE OF SPARKS DO NOT WANT ANY POWER LINES THRU OUR CITY.

THE ALTURAS PROJECT CAUSES OUR NEIGHBORHOOD GREAT CONCERN ESPECIALLY SINCE THE NEVADA ALTERNATIVE ROUTE WAS TO DESTROY 64 HOMES OF WHICH MANY OF US HAVE PUT OUR BLOOD SWEAT AND TEARS INTO IMPROVING OUR HOMES. WE STARTED WITH A DIRT LOT AND A HOUSE 7 YEARS AGO AND HAVE ADDED FENCES, LANDSCAPING, DECKS, ETC. TO OUR PROPERTIES. SOME OF US ARE GOING TO STOP ANY FURTHER IMPROVEMENTS UNTIL WE HEAR OF A DEFINITE DECISION ON THIS PROJECT. BESIDES THIS CAUSING A FINANCIAL BURDEN, YOU CAN ALSO VISUALISE THE EMOTIONAL DISTRESS CAUSED. GP. 54-1

THANK YOU FOR YOUR CONCERN.

Beverley Eastwood
Edward D. Eastwood

BEVERLEY AND EDWARD EASTWOOD
1346 SATELLITE COURT
SPARKS, NV. 89436-9321

Edward Guiliano
2450 Seneca dr.
Reno, Nevada 89506
(702) 972-6148

General Public Comment Set 55

May 17, 1995

Ms. Julie Halligan- California Public Utilities Commission
Mr. Peter Humm- Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, Ca. 91301

Re: Formal Protest of the Alturas 345KV Powerline
CPUC Application Number 93-11-018 and BLM Case Number CACA-31406

Dear Ms. Halligan and Mr. Humm:

After carefully considering the Pros and Cons of the Alturas 345KV powerline routing near Horizon Hills through Peavine Mountain, the conclusion for me was that there are no Pros only Cons. Therefore I'M opposed to the powerline going through here.

I agree with letter of protest sent to your commission by Cari Lockett of the Horizon Hills General Improvement District.

On Sunday May 14, 1995 it became clear to me that its okay to put the powerline in my backyard as long as its not your backyard. This is referring to the article in the Reno Gazette Journal on May 14, 1995. The Mayor of Sparks stated he wants to make sure that putting the powerline through Sparks won't come up again, however he feels sorry for the Reno residents that could be affected because its going to be ugly.

GP. 55-1

Please find another solution other than near my house through Peavine Mountain.

Thank you for your time.

Sincerely,

Edward Guiliano

RECEIVED MAY 2 2 1995

May 13th, 1995

General Public Comment Set 56

Julie Halligan & Peter Humm
CPUC and BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC 93-11-018, BLM CACA 31406.

Dear Ms. Halligan & Mr. Humm,

Please refer to page ES-37 of the DEIR where it states; "Depending on the alternative selected, there could be viewsheds affected by the transmission line, which could result in significant impacts on property values in a very limited number of cases where acquisition is not warranted. These impacts would be reduced to an insignificant level by the applicant participating in neutral arbitration to determine what compensation, if any, would be due the property owner".

This language puts the impacted property owner at a disadvantage and needs to be changed. There will most certainly be property owners who's viewsheds will be severely impacted by this Project, even though the Project is not on their property. Mitigation and/or compensation should be offered to these impacted people. This language places the burden on the impacted property owner as he would have to seek legal action to force mitigation. The burden SHOULD fall on Sierra Pacific. The language should state that any property owner that feels his viewshed has been impacted to the point of property values being less should be compensated or mitigated in some specific predetermined way by a predetermined criteria. As Sierra Pacific is the party that is invoking harm, the criteria should favor the property owner and NOT Sierra Pacific. GP. 56-1

Please properly address language for the impacted property owner who's viewshed is disrupted by Sierra Pacific's invasive action.

Sincerely,

Doreen Orner

Doreen Orner, P.O. Box 1551
Alturas, CA 96101

RECEIVED MAY 2 3 1995

Doyle, Calif.
May 19, 1995

Julie Halligan / Peter Hamm.
C.P.U. Application number (93-11-018)
BLM. Case Number (CACA-31406.

General Public Comment Set 57

Dear Julie Halligan / Peter Hamm
CPUC / BLM

I am very concerned about the 130 foot high power line which is going through our area. I think this power line would effect the area very much. You would have to take alot of the hitterbush + other food that our wildlife needs very much. I have lived in this area over 50 years, and I've seen alot of brush taken out, so more homes & buildings could go up. No wonder the wildlife is moving in on the towns. We don't need another Los Angles area here. They are now complaining about the wildlife that roam in their yards. We have a good power line through our area, and we dont need another huge one. I would not like to see a trashed landscape and damaged wildlife area. I think Long Valley is a pretty area and lets try and keep it that way

GP. 57-1

Thank You, Sincerely, Lottie Main Box 66 Doyle Ca 96109

General Public
Comment Set 58

RECEIVED MAY 2 3 1995

5/20/95

To whom it may concern:

I'm a resident of Horizon Hills Sub division. I'm very concerned about these Transmission lines coming down from Alturas through our neighborhood. I bought my house 3 years ago in Horizon Hills due to the beauty & peace of the country. I feel this would put a big damper on the beauty, especially when looking out my front windows a seeing large Transmission line against the hill side. Would ruin the view. Not only destroying the beauty and recreation, would also decrease our property values.

GP. 58-1

I'm writing to you because I'm stating that I'm totally against this project. Would be ruining our view of the Mountains, possible health risk (from EMF), noise and public safety. I feel there should be more alternative routes, instead of through residential areas.

A Concerned resident of Horizon Hills
Thurlow Newman 8005 Blackfoot Murieno.

RECEIVED MAY 2 4 1995

KIMBERLEY WIRSHING
2219 PAWNEE COURT
RENO, NEVADA 89506

May 21, 1995

Julie Halligan, CPUC/Peter Humm, BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

General Public Comment Set 59

Re: Alturas Transmission Line Project

Dear Ms. Halligan and Mr. Humm:

I am writing to you out of concern for my families health and well being, and I am sure that I speak for all the residents of Horizon Hills.

My husband and I purchased our home in Horizon Hills in April of 1984. One of the reasons we chose this area was because of the peace and beauty. We had our daughter in November of 1986 and love raising her in this environment. It is much cleaner and quieter then in the city. If you were to allow this Alturas Transmission Line Project to happen, the peace and beauty would be greatly effected. We feel very strongly about a possible health risk from the EMF, that could put my daughters future life in jeopardy. We have been health conscious parents and try to see that she is taken care of in the best possible way. If you have children, I am sure that you would feel the same way. Would you not do everything possible to see that your children were raised in the healthiest possible environment? GP. 59-1

Of course we are also concerned for the adults as well, but we all know that children are more susceptible to a health risk for many reasons. One being that they are definitely not strong enough to fight off something as harmful as this project could be.

Please consider how you would feel if you were in our position. If you lived in our community, I know that you would have seeked out other alternatives. I was surprised to find out that more alternatives were not offered. Please do everything in your power to help us. GP. 59-2

THIS PROJECT DOES NOT HAVE TO HAPPEN IN OUR NEIGHBORHOOD.

In a letter to you from Cari Lockett, on May 10th 1995, some of the issues brought to your attention included health and safety risks, noise impact, alternate routes, damage to property values, beauty of our area destroyed, and recreational use of our foothills eliminated. There is also another issue that concerns me. The rescue and fire agencies can not continue serving our communities in the best and most efficient way if you destroy their flight path. Please don't do this. GP. 59-3

Won't you please... please... please... find a route that will not interfere with our community and the safety and health of all who are in this area.

Thank-you for taking the time to read this letter. We understand that you have a job to do, but please treat this issue as if it was in your backyard, so that we are not subject to the many possible problems that this project could cause in our area.

Very Sincerely Yours,

Kimberley Wirshing
Home Owner - Horizon Hills

cc:
John Mendoza
Nevada Public Service Commission

Governor Bob Miller

Scott Nebesky
Truckee Meadows Regional Planning Agency

Senator Richard Bryan

Senator Harry Reid

Congresswoman Barbara Vucanovich

Assemblywoman Joan Lambert

Washoe Co. Commissioners
-Jim Shaw, Chairman
-Steve Bradhurst, Vice Chair
-Grant Sims
-Joanne Bond
-Mike Mouliot

Washoe Co. Planning Commission - Development Review

North Valleys Citizen Advisory Board

Sierra Pacific Power Company
-Roger Olack
-Steven Younkin
-Mike Reid

MAY 20, 1995

RECEIVED MAY 2 4 1995

MS. JULIE HALLIGAN - CALIFORNIA PUBLIC UTILITIES COMMISION
MR. PETER HUMM -BUREAU OF LAND MANAGEMENT
C/O ASPEN ENVIRONMENTAL GROUP
30423 CANWOOD ST. #218
AGOURA HILLS, CA 91301

General Public Comment Set 60

RE: ALTURAS 345KV POWERLINE

DEAR MS. HALLIGAN AND MR. HUMM:

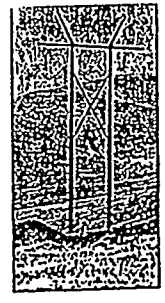
I AM WRITING YOU ABOUT THE PROPOSED ALTURAS POWER LINE PROJECT OF SIERRA PACIFIC POWER CO. MY WIFE AND OUR FAMILY MOVED TO HORIZON HILLS 10 YEARS AGO. AFTER COMING FROM THE BAY AREA, WE WERE VERY IMPRESSED WITH THE BEAUTY OF THE FOOTHILLS AND PEAVINE MOUNTAIN. WE ALSO HAVE ENJOYED THE PEACE AND QUIET THE AREA OFFERS. NORMALLY THERE IS NO NOISE TO BE HEARD, EXCEPT FOR BIRDS AND OTHER LOCAL WILDLIFE. THERE IS NOT ANOTHER NEIGHBORHOOD LIKE THIS IN ALL OF THE RENO/SPARKS AREA, ESPECIALLY CONSIDERING THE AFFORDABLE HOUSING AND THE HALF ACRE LOTS. PEOPLE IN THIS NEIGHBORHOOD TAKE PRIDE IN THEIR HOMES. THIS POWER LINE IS TOTALLY UNACCEPTABLE. TO RUIN THE BEAUTY OF THE FOOTHILLS WOULD BE A CRIME AGAINST NATURE AND ALL OF THE PEOPLE WHO LIVE IN HORIZON HILLS AND THE STEAD AND LEMMON VALLEY AREA. WHY SHOULD ALL OF THESE PEOPLE HAVE TO SUFFER BECAUSE OF GREEDY SIERRA PACIFIC POWER COMPANY. FROM WHAT I HAVE LEARNED, THIS POWER LINE IS BEING INSTALLED TO SUPPLY POWER TO MINING INTERESTS. WHY SHOULD WE HAVE TO PAY FOR THEIR OWN SELF INTERESTS. IF THIS POWER LINE IS INSTALLED, KNOWLEDGABLE REAL ESTATE PROFESSIONALS SAY OUR PROPERTY VALUES WILL GO DOWN 20 PERCENT. BEING A MIDDLE CLASS WORKING PERSON, I CANNOT AFFORD TO LOOSE $24,000 EQUITY IN MY HOME. THE ONLY ALTERNATIVE I SEE IS TO BURY THE LINE AND MAKE THE END USERS PAY FOR IT. OVER A PERIOD A MANY YEARS, THE COSTS WILL LEVEL OUT. MINING AND SIERRA PACIFIC CAN AFFORD THIS COST, I CAN'T. PLEASE LOOK AT THE PICTURE I HAVE ENCLOSED. THESE TOWERS ARE GOING TO BE 70 - 130 FEET TALL DEPENDING ON THE TERRAIN. WOULD YOU LIKE THESE UGLY HEALTH HAZARDS IN YOUR BACK YARD. BE HONEST. THERE ARE 165 HOMES IN THIS NEIGHBORHOOD, PLEASE DON'T DESTROY THIS AREA.

GP. 60-1

RESPECTFULLY SUBMITTED,

Terry A. Kirby

TERRY KIRBY
8250 MOHAWK LANE
RENO, NV., 89506



CC:
JOHN MENDOZA
NEVADA PUBLIC SERVICE COMMISSION

SCOTT NEBESKY
TRUCKEE MEADOWS REGIONAL PLANNING AGENCY

BILL VANBRUGANN
U.S. FOREST SERVICE
TOIYABE NATIONAL FOREST

U.S. FISH AND WILDLIFE
RENO FIELD STATION

GOVERNOR BOB MILLER

SENATOR RICHARD BRYAN

SENATOR HARRY REID

CONGRESSWOMAN BARBARA VUCANOVICH

SENATOR BILL RAGGIO

WASHOE CO. COMMISSIONERS

LORI BURKE - CITIZEN'S COMMITTEE

JAN LOVERAN - CITIZEN'S COMMITTEE

WASHOE CO. PLANNING COMMISSION
-DEVELOPMENT REVIEW

NORTH VALLEYS CITIZEN ADVISORY BOARD

RECEIVED MAY 24 1995

May 12, 1995

General Public Comment Set 61

Julie Halligan/Peter Humm
CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC #93-11-018, BLM #CACA 31406

Dear Ms. Halligan and Mr. Humm,

On page ES-32 of the Draft Environmental Impact Report, mitigation is suggested to help alleviate the cumulative impact of EMF in regards to this project. It suggests "considering a minimum setback of 300 feet from the transmission line or substations of any future occupied structure on parcels crossed by the Proposed Project". This agreeable setback would further reduce property values, yet there is no language in the DEIR that states that the property owner would be compensated for this. If the 300 foot setback is adopted, then Sierra Pacific should be required to purchase a 600 foot easement. Why should the property owner shoulder this liability? GP 61-1

Please make sure to address the expansion of the purchased easement to 600 feet.

Sincerely,

Ann B Marks

Ann B. Marks
P.O. Box 1920
Alturas, CA 96101

General Public
Comment Set 62

RECEIVED MAY 2 4 1995

5-20-95

RE: CPUC APPLICATION No 93-11-018
BLM CASE No. CACA-31406

ATTENTION: SUSIE HALLIGAN AND PETER HUMM

I WISH TO EXPRESS MY CONCERN REGARDING THE ALTURAS TRANSMISSION LINE PROJECT. AS A RESIDENT OF HORIZON HILLS FOR THIRTEEN YEARS, I DON'T WANT MY PROPERTY VALUE ON MY HOME TO BE LOWERED. I PURCHASED A HOME IN THIS AREA FOR THE USE OF PEAVINE MOUNTAIN, THE WILDLIFE, AND THE QUIET. I ALSO FEEL THAT THE HEALTH RISKS FROM EMF ARE TOO GREAT TO BE THIS CLOSE TO HOMES. I HOPE YOU WILL TAKE THIS CONSIDERATION WHEN YOU MAKE YOUR DECISION. GP. 62-1

THANK YOU,

8290 MONAWK LN
RENO, NV 89506

Vincent Mangur
VINCENT MANGUR

General Public Comment Set 63

LARRY D. SKINNER
8205 Mohawk Lane
Reno, Nv. 89506
H(702) 677-8221
O(702) 747-5010
FX(702) 747-0541

MAY 22,1995

JULIE HALLIGAN/PETER HUNN
CPUC/BLM
C/O Aspen Environmental Group
30423 CANYOON STREET, SUITE 218
AGOURA HILLS, CA. 91301

RECEIVED MAY 28 1995

CPUC APPLICATION No. 93-11-018
BLM Case No. CACA-31406

JULIE HALLIGAN, PETER HUNN,

I AM WRITING TO EXPRESS MY OPINIONS PERTAINING TO THE "ALTURAS INTERCONNECT" PROJECT (CPUC APPLICATION NO. 93-11-018, BLM CASE NUMBER CACA-31406).

AS A HOME OWNER IN HORIZON HILLS I AM ANGRY BECAUSE I WAS NOT MADE AWARE OF THE PROPOSED "ALTURAS INTERCONNECT" PROJECT AND ONLY ACCIDENTALLY DISCOVERED IT. I FEEL IT IS MY RIGHT AND THE RIGHT OF ALL RESIDENTS THAT MAY BE DIRECTLY OR INDIRECTLY IMPACTED TO HAVE BEEN INFORMED. I AM APPALLED THAT A PROJECT OF THIS MAGNITUDE, POSING SIGNIFICANT IMPACTS TO PROPERTY OWNERS, THE ENVIRONMENT, LAND USE, AND AESTHETICS HAD BEEN KEPT LOW PROFILE AND QUIET DURING SEVERAL YEARS OF PLANNING AND WAS ONLY BROUGHT TO ATTENTION AT THE TWILIGHT OF THE COMMENT PERIOD. GP. 63-1

IT IS MY OPINION THAT THE PROJECT (ALTURAS INTERCONNECT) POSES A NEGATIVE IMPACT ON THE FOLLOWING:

1) PROPERTY VALUES.
2) DESTRUCTION OF ESSENTIALLY VIRGIN TERRAIN.
3) DAMAGE TO THE IMMEDIATE ENVIRONMENT.
3) LOSS OF LAND USE.
4) AESTHETICS, BOTH VISUAL BEAUTY AND VALUE.
5) DISRUPTION TO WILDLIFE.
6) QUALITY OF LIFE TO RESIDENTS IN PROXIMITY.
7) POTENTIAL UN-KNOWN HEALTH RISKS FROM "EMF".
8) REDUCED/DAMAGED RECREATIONAL USE.

GP. 63-2

I AM DISAPPOINTED THAT MORE ALTERNATIVES WERE NOT EXPLORED. IT IS APPARENT THAT THE PROJECT HAS BEEN BASED SOLELY ON "ECONOMICS OF INSTALLATION" AND NOT THE BEST INTERESTS OF RESIDENTS IN OUR COMMUNITY OR THE ENVIRONMENT. IF ALTERNATIVES TO THIS PROJECT ARE "TOO EXPENSIVE" TO UNDERTAKE WITHOUT ADVERSELY IMPACTING OUR COMMUNITY AND RESIDENTS, REGARDLESS OF THE POPULATION DENSITY AND IT'S AFFLUENT CLOUT, AND ADVERSELY IMPACTING ESSENTIALLY VIRGIN TERRAIN THEN I FEEL THE PROJECT IS TOO EXPENSIVE AND SHOULD BE ABANDONED. IF THIS IS NOT THE CASE THEN A MORE COMPATIBLE ALTERNATIVE SHOULD BE FOUND EVEN IF MORE COSTLY. MAY I REMIND YOU THAT FOR RESIDENTS IN PROXIMITY AND THE ENVIRONMENT ONCE THIS PROJECT IS ESTABLISHED IT IS FOREVER. GP. 63-3

RESPECTFULLY YOURS,

LARRY D. SKINNER

RECEIVED MAY 26 1995

May 23, 1995

General Public Comment Set 64

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Ste. 218
Agoura Hills, CA 91301

Re: CPUC App. No. 93-11-018
BLM Case # CACA-31406

To Whom It May Concern:

Yesterday I received a flyer from one of my neighbors with more information concerning the power line from Alturas ("The Sierra Pacific Power 345 Kilovolt Profit Corridor"). The first two paragraphs explain the nature and function of the would-be structures. The next two paragraphs are, I believe, to induce hysteria or mild fear. The fifth paragraph has two lines that have the most impact to me: "A transmission line carried by 130 ft. towers is unwelcome to the ridge tops and vistas of Washoe County and impacts the property values of those living within their site." Amen!

Enclosed is photo of the view of the property from our back yard. You may notice an abandoned mine to the left and a canyon full of aspen trees to the right. Where the yellow meadow ends and the sagebrush begins is roughly the area of the railroad tracks that would run left to right, about 1" up, in this photo. I'm assuming that this view would be blighted by transmission lines. I also believe that the land between the mountains and the railroad tracks would be blighted also. On this land, streams run from the snow melt from the mountains, and many birds, rodents, coyotes, reptiles and deer call this mountain meadow home. To think that (how many years of?) construction would drive these animals away and make the land even inhospitable to humans is very distressing. Enclosed also is an advertisement for a poster by R. Crumb; this poster came to mind when I found out about the Alturas power line. GP. 64-1 GP. 64-2

My husband and I bought our seven acres here in 1987. We completed our house in 1992. It was like realizing a dream: to live in the country, to have horses (and a place to ride them!), to take our children for hikes in the nearby mountains. And we GP. 64-3

May 23, 1995

Aspen Environmental Group -2-

pay for all of these privileges still. We have no county services here. We clear the roads ourselves in the winter. We roll our garbage can a block down the street so the garbage will be collected. We have our own fire department. When we hike, we pick up garbage that many careless hikers have left out on the trails.

This is what the Alturas transmission line means to me: Careless workers trashing the countryside to benefit 1) A city we get no services from, 2) A company only concerned about their bottom line, 3) A city that is growing too large, too fast (Hey, what do *I* get?). They say Nevada is just a suburb of California. Well, I moved here for a different experience! If I want to go to the East Bay Area, all I have to do is drive down South Virginia Street in Reno. It's all too close! I'm feeling claustrophobic already!!! GP. 64-3

My family needs the Nevada experience: getting on your horse and riding to the canyons where the deer bed down, hiking in the high country in the spring to enjoy the wildflowers, watching the aspens go orange in the fall.

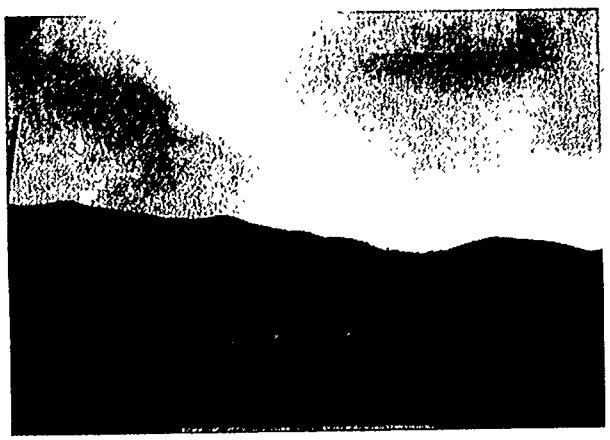
I think that SPP Co. should be more creative with their plans, and stay out of my back yard unless they're checking the meter (by the way, we experience 100+ m.p.h. winds out here, so I question the practicality of this project). I care too much about my surroundings to only stress out about it, which is the purpose of this letter. Hopefully, the time will not come when my neighbors and I stage a sit-in between the railroad tracks and Peavine mountain with placards saying "NO ALTURAS TRANSMISSION LINE" and "SPP Co. OUT OF ANDERSON ACRES".

Sincerely,

Rebecca M. Zatarain

Rebecca M. Zatarain
11375 Longview Lane
Reno, NV 89506

cc: John Lundemo
Enclosures



A SHORT HISTORY OF AMERICA

by R. Crumb

Powerful **Robert Crumb** creation shows the metamorphosis of a virgin corner of land into a blemish of urban blight. "What next?" Indeed! Our most popular poster.
16 1/2" x 23 1/2"

A SHORT HISTORY OF AMERICA:
PSHORT $8.00

RECEIVED MAY 26 1995

May 7, 1995

General Public Comment Set 65

Julie Halligan/Peter Humm
CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, California 91301

Alturas Intertie, CPUC#93-11-018,BLM#CACA31406.

Dear Sirs,

The DEIR identified a multitude of impacts. Negative impacts far outweigh positive impacts. It is now obvious that Modoc County will be severly impacted. These impacts point to one conclusion, that being that the Project should not be built in Modoc County (if it should be built at all). The DEIR does not address the fact that the total impacts on Modoc County will be excessively heavy. The visual impacts alone are unmitigable. GP. 65-1

Cordially,

Kathy Dunn

Kathy Dunn
P.O. Box 916
Alturas, Ca. 96101

General Public
Comment Set 66

CPUC #(93-11-018) BLM (CACA-31406)

RECEIVED MAY 26 1995

To Whom it may Concern,

Please don't use our Back Doors to route the new electric lines. There are too many reasons against this route. Along the bottom slope of Peavine near Horizon Hills.

Our concerns are very real.

Property values will decrease

Beauty will be destroyed

wild life & people will be disturbed by the noise

Too Close to us for our safety & health.

I'm sure there are alternate plans.

Please reconsider & use another.

Thank you for your consideration.

Sincerely

Betty J. Schumach

GP. 66-1

RECEIVED MAY 30 1995

General Public
Comment Set 67

May 19, 1995

Dear Ms. Halligan and Mr. Humm,

GP. 67-1 This letter addresses the Alturas Intertie, CPUC #93-11-018/BLH #CACA 31406. After reading the Draft Environmental Impact Report prepared by Aspen Environmental, I found that the effect of noise on wildlife habitat was not addressed or mitigated. For example, in deer wintering areas during damp winter weather, the line would emit crackling sounds which may detract from use of browse under, or near the lines. It may also startle weakened deer to the point of concern or provide background noise enough for deer to not adequately detect predators. These possible effects were not studied in the DEIR. Please make sure they are properly addressed.

There are too many unknown factors and factors that have not been addressed to warrant construction of the project.

Thank you for your attention.

Sincerely,

Kathelle Brogan
P.O. Box 743
Alturas, CA. 96101

RECEIVED MAY 30 199

John Ray
8115 Seneca Dr.
Reno, NV. 89506

General Public
Comment Set 68

Dear sirs

I'm sure you have recieved many letters on the proposed power line in north Reno and I believe it is more a 'done deal' than less. I have the same concerns as others but with a twist.

My other concern is related to my hobby that I started as an explorer scout in 1959. I'm an ameteur radio operator and my station, KD7DJ, is on the top part of Seneca Dr. where the power line is the closest to the houses. I have a tremendous amount of time and a considerable amount of money invested in my hobby. Although these lines to the west and north of my antennas will not stop my hobby, I suspect it will deminish my ability to communicate to countries in these directions. Also loose and worn connections due to poor maintenence or the inherent high winds in this area will ruin reception in any direction. GP 68-1

Just a note: "I WAS HERE BEFORE THE POWER LINES"

My suggestion is to put these lines further up the mountain, perhaps in the valley behind your present location. It would be out of full view most of the way.

Thank you for your attention

John Ray

John Ray

RECEIVED MAY 30 1995

General Public
Comment Set 69

CPUC Application No. 93/11/018 BLM Case Number CACA - 31406

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills,CA 91301

We would like to list our concerns about the Alturas Transmission Line Project. Our main concern is with the visual impact of the line. Not only the line itself, but the scars left from the installation and maintenance of the line on a very slow healing desert landscape. As seen around other lines in the area, they are never allowed to heal. Many of us who live in Horizon Hills consider the uncluttered landscape between our homes and Peavine Peak to be one of our greatest assets.

Speaking of assets, we have heard from some of our neighbors who have their houses for sale that they have had to lower their asking price when it was learned that a transmission line was going through the area. Although we would love to stay in the area, what with todays job climate you never know when you may have to pack up and move on. The thought of having to sell our house at a less than favorable price because of a transmission line is not exceptable.

It is generally believed in this community that a better route could have been choosen for this line

GP. 69-1

IN ALL SINCERITY
MICHAL FLETCHER AND
HOWARD HANSEN
8195 BLACKFOOT WAY
RENO, NV 89506-9119

General Public
Comment Set 70

SUBJECT:
Sierra Pacific Power Co.
Alternate Trans. Line Project

5/24/95

TO WHOM IT MAY CONCERN:

WHO IN THEIR RIGHT MIND WOULD WANT 131 foot TOWERS IN THEIR BACK YARD.

I moved to the Reno area from Cali just to get away from the big corporations that simply swoop in and grindup all the poor folks. Why don't you try and run your DAMM lines through the SOUTH of TOWN WHERE ALL YOUR RICH FOLKS ARE.

WE DON'T WANT OR NEED THESE UGLY POWER LINES IN OUR BACKYARDS

I KNOW THIS LETTER IS BEING WRITTEN IN VAIN. BIG CORPS DON'T CARE — ALL THEY WANT IS THEIR ALL MIGHTY DOLLAR ? WHO CARE ABOUT OUR HEALTH?

STOP STOP STOP !!!

GP. 70-1

P.S. Please let me know if letters like this have done anything by all the politically NOT.

10800 Longwell Dr.
Reno, NV 89506
Anderson Acres
William E. Boyle
—Home Owner—

RECEIVED MAY 30 1995

5/24/95

re: CPUC Appl. # 93-11-018
BLM Case # CACA-31406

S. H. Leonard and Family
8185 Blackfoot Way
Reno, NV 89506

General Public Comment Set 71

Julie Halligan / Peter Hunnam
CPUC / BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Reviewers:

I have grave concerns regarding the proposed Alturas Transmission Line Project. The primary reasons we located in Horizon Hills in 1983 was a relatively unobstructed view of Ravine Mtn and associated foothills and the accessibility of the then BLM (now F.S.) public lands and associated recreational opportunities. A high-voltage powerline in obvious view from our dining room window is objectionable for me and I'm sure it would be to others who might like to locate here for the same reasons, thus reducing everyone's property values. My family is also concerned for other reasons that may or may not be substantiated, but we don't like the potential risks such as noise and other public safety concerns. We sincerely hope you will consider the alternative presented by Cheri Lockett, Secretary, Horizon Hills H.I.D. on 5/10/95 or other alternatives that have less direct impact on residents.

GP 71-1

Thank You
Stephen H. Leonard

RECEIVED MAY 30 1995

General Public Comment Set 72

CAUC. App. #93-11-018 BLM Case # CACA-31406

5-19-95

To whom it may concern:

I am very opposed to the Alturas Transmission Line coming through the Pearvine foothills through Horizon Hills area.

I have lived here for five years and think of Pearvine as part of our backyard. Everyday we use the area to walk, run the dog, ride our bikes, play in the open spaces.

I have three sons who play and enjoy our area which is safe and adds to their growing environment. (GP 72-1)

I can't image the impact it would have on our family life. Everyday, it would be drastically changed. The quality of our lives together on our walks and hikes would surely suffer. We chose to live out of the city because we like the area near Horizon Hills - open spaces! The idea of the view being wrecked by the transmission line makes me feel ill!

Please secure another alternative!

Thank you!

702-972-5233
2270 Osceola Ct
Maureen Oppermann Reno Nv 89506

RECEIVED MAY 30 1995

MAY 23, 1995

General Public Comment Set 73

JUNE HALLIGAN

ASPEN ENVIROMENTAL GROUP

30423 CANWOOD ST., SUITE 218

AGOURA HILLS, CALIF. 91301

Dear Mrs Halligan,

I will be purchasing a new home in the Vintage Hill area in Sparks, and I am very concern about the power line that is coming through from California. Whether it will be set up in that area will interfere with me purchasing the house, and I need to know before July, can you please send me some information on that power line. Address is: 3502 Longridge Dr., Sparks, Nv 89434. (GP. 73-1)

I hope it just stay on the route parallel to Highway 395, and does not pass through Sparks area.

Sincerely yours,

Melinda Lang

RECEIVED MAY 30 1995

May 22, 1995

General Public Comment Set 74

Ms. Julie Halligan - CPUC
Mr. Peter Humm - BLM
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

RE: Individual protest of the Alturas 345 KV Powerline.
CPUC App. #93-11-018 and BLM Case # CACA-31406

Dear Ms. Halligan and Mr. Humm:

We are writing you today to let you know that we are strongly against the planned routing of the Alturas 345 KV powerline. We live in the Horizon Hills Subdivision located on the eastern slope of Peavine Mountain. We and all the residents here will be greatly impacted by the proposed location of this transmission line.

GP. 74-1

We recently found out about it and we are quite disturbed. We just moved to this subdivision one and a half years ago to get away from downtown Reno's congestion, noise, buildings, construction, and structures such as these powerlines. We chose this area because of the peace and quiet here, plus the recreational aspects of the USFS land that lies directly behind us.

Peavine Mountain is a major recreational use area for hikers, bikers, hunters, horse-back riders, and off road vehicles. There are ponds in this area where several people come to swim, sun bathe, and fish regularly. This is home to all the wild life in this area from golden eagles to meadowlarks, mountain canaries, coyotes, deer, rabbits etc., that we enjoy seeing in our environment. If this powerline goes through, we may not be seeing any of these wonderful creatures anymore.

GP. 74-1

This proposed line will come within 2,000 feet of our private water tank and within 2,500 feet of some of our neighbors homes. We don't understand why this line has to be routed so close to our community. There has to be other, less destructive, more suitable alternatives.

We are concerned about our property value. Some of our neighbors have already had problems with the sale of their homes because prospective buyers have heard about the powerline. We are also concerned about the noise of these lines. Will they whistle in the wind? We have very high winds here, sometimes in access of 100 MPH.

Futhermore, if the Forest Service allows for this corridor, this could pave the way to future land give-aways.

GP. 74-1

Finally, to sum it all up, we do not want the visually ugly structures in our area. Would you want them in yours? Our lifestyle, homes, peace and quite and the beauty of our surroundings will be destroyed by this 345KV monster powerline in our backyard.

Sincerely and Respectfully,

Tara A. Bay
George L. Bay

Horizon Hills residents at:

2420 Seneca Drive
Reno, NV 89506

RECEIVED MAY 26 1995

General Public Comment Set 75

MAY 22, 1995

Christenhusz
2435 Seneca Drive
Reno, NV 89508

CPUC APPLICATION #: 93-11-018
BLM CASE #: CACA-31406

TO ALL THOSE CONCERNED WITH THE ALTURAS TRANSMISSION LINE PROJECT PROJECTION:

We're writing to express our concerns over the Alturas Intertie Project proposed placement at the foot of our subdivision, Horizon Hills.

Being a host to a Southern Pacific Railroad yard packed with transport cars filled with propane all winter long, we feel we've fulfilled our obligation to our community's needs. Sometimes in the mornings our fellow citizen's energy needs make us late for work, when we get stopped by the train track separating our half of the subdivision from the rest of the paved world.

We also question the environmental impact statement. During a H.H.G.I.D. meeting, S.P.P. representatives presenting the project, could not answer questions on placement of the lines in close proximity to 2 Golden Eagle nesting sites, but could answer questions about antelope calving grounds.

Another nagging question which everyone seems to be downplaying, is the visual effect. Is it wise to place such a high profile, unattractive piece of equipment along a scenic, fairly uncluttered major artery into our community? A community actively soliciting tourists to drive down this artery to support our ecomomy. It seems to us, we should be cleaning our area up of unsightly things, rather than adding more, at this point in time. Peavine has escaped the clutches of Granite's gravel pit and we surely would like to see it escape another scar which only could become worse with more and higher voltage transmission lines passing from north to south. GP. 75-1

What also concerns us are the proposed benefits to our entire community. "A more diversified power supply to back up the Reno-Sparks area in case of a disaster that could cut a powerline and overtax the system." When questioned, S.P.P. representatives replied that most of this new power would be sold to mining interests and what remains, to new casinos and subdivisions. Benefits to current Reno-Sparks residents it seems to us, would be a reduction in power outages, which we have to put up with anyway, on a local basis.

How come there are no alternate routes? We're told that there is already a north to south corridor to the east of Alturas. Where is the proposed route to tie into this corridor? Won't this place the power closer to it's main users, and not in an area where hundreds of thousands of people will see it everyday?

To sum this up, keep this thing out of our backyard. It will destroy the rural atmosphere that all the residents along the proposed corridor now enjoy. New development has to pay for itself. Why should we be made to pay for it, with our lifestyles and property value? Let the mines, the Silver Legacy and all the new housing developments pay to put it somewhere else, or bury it, instead of dumping something else in our neighborhood, just because it's the cheapest thing to do. GP. 75-1

If this project does go through, don't depend on our vote in the next election.

Sincerely;

Ron Christenhusz Debi Christenhusz

Ron and Debi Christenhusz

COPIES SENT TO:

Chairman, John Mendoza
Congresswoman Barbara Vucanovich
Senator Richard Bryan
Assembly Woman Joan Lambert
Julie Halligan
Stephqn P. Younkin SPPCO
Mike Reid SPPCO
Bill Van Brugann
Governor Bob Miller
Senator Harry Reid
Senator Bill Raggio
Commissioner Joanne Bond
Peter Humm
Roger Olack SPPCO
U.S. Fish & Wildlife

RECEIVED MAY 30 1995

2440 Seneca Dr.
Reno, Nv 89506-9111
May 25, 1995

General Public Comment Set 76

To whom it may concern:

We are writing concerning the Alturas Transmission line project EIR/S CPUC application number (93-11-018) and the BLM Case number (CACA-31406).

We feel it would be a grave mistake to bring this 345KV power line through Long Valley and the Peavine Mountain region for the following reasons:

1) Major wildlife area; two Golden Eagle nests, one within a hundred feet, the other less than a quarter mile from the center of the proposed line. A major deer feeding and migration area. The EMF's, the lines humming, and the wind whistling through these structures would greatly disturb the animals throughout the area. We will gladly take any one of you on a tour of these areas. (GP. 76-1)

2) According to the earthquake fault map, there are several major and minor earthquake faults in these areas. These faults could cause ecological disasters if they were ever to topple any of these structures. (GP. 76-2)

3) The forest service saved the north side of Peavine mountain from becoming a gravel pit only to now consider it becoming a major power line corridor. This area is winter deer feeding grounds, and visually a wonderful scenic view If this power line is allowed, several more would be allowed beside it. What is wrong with this picture??? (GP. 76-3)

4) We realize, there will always be progress. But, we bought our home out here with the understanding that our backyard was Forest Service property, wild and natural, beautiful to look at, and delightful to behold. The power lines and structures with their EMF's humming and whistling, would destroy the reasons we moved here as well as our property values. We are native Nevadans born and raised in Reno (Joy and Jay. Don moved here in 1973). We know about progress but we love our open lands. (GP. 76-4)

5) The power company's own engineers stated there is no need for the 345KV line only perhaps a 120KV line into the Truckee Meadows area. They also stated that the existing north south power line corridor could be successfully used to transport the 345KV line, then north of town a 120KV line brought to the Reno area and the rest of the power diverted to the mining industries east of the Truckee Meadows. The MAJOR reason for this entire project. (GP. 76-5)

Its amazing how the government encourages us to find alternate sources of energy. There are Geo-thermal operations which have created power successfully in this area. They have been told their contracts may not be renewed, or payments greatly reduced because of this project. (GP. 76-6)

Furthermore, it is incredible how proper notification of property owners has been shrugged off by saying, Oh well, I guess we tried. This is inexcusable! The bureaucrats must not be allowed to step on the general public, we can be heard and speak for all of the silent people and the wildlife who are unable to speak for themselves, we should all be seen and heard. (GP. 76-7)

Sincerely,

Don Anhold Joy C Anhold Jay Anhold

Don, Joy, and Jay Anhold

Copies: Julie Halligan CPUC
Peter Humm BLM
Governor Bob Miller
Senator Harry Reid
Senator Richard Bryan
Senator Bill Raggio
Congresswoman Barbara Vucanovich
Chairman John Mendoza
Assembly Woman Joan Lambert
Commissioner Joanne Bond
Stephan P. Younkin SPPCO
Roger Olack SPPCO
Mike Reid SPPCO
Bill Van Brugann USFS
U.S. Fish and Wildlife Reno Field Station

ANDREA DUNBAR / ARTHUR CAMP (FATHER)
106 E. EUCALYPTUS
OJAI, CA. 93023

RECEIVED MAY 31 1995

General Public Comment Set 77

RE: CPUC AP # (93-11-018)
BLM
(CACA-31406)

May 25, 1995

To whom it may concern;

Let this letter serve as notice that we, the undersigned, vehemently oppose the construction and implementation of the proposed towers to carry power across the valley. The proposed location of the towers comes within 1400 feet of the edge of our property. Not only will the towers completely destroy and corrupt the natural beauty of the area, additionally recent studies suggest health hazards in relationship to the power lines which they support. Furthermore, the towers will interfere with the present unspoiled view across this scenic area.

This is a blatant rape and obliteration of a natural landscape and is with no doubt one of the most disgusting and upsetting developments to ever take place in the fifty plus years that we have been landowners in this area. We strongly oppose the installation of the towers and demand that you reconsider. We further suggest that all options must be explored before any installation of this type be considered!

GP 77-1

Let it be made clear that we will not give up our opposition until this ridiculous wanton destruction of our environment is abandoned.

Sincerely,
Andrea Dunbar et al (for)
The Camp Family
Pauline Camp
J. S. Camp
Gregory Camp
Arthur Camp

09000.000 - 2986.1

RECEIVED JUN 0 1 1995

General Public Comment Set 78

May 25, 1995

Ms. Julie Halligan - California Public Utilities Commission
Mr. Peter Humm - Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

RE: FORMAL PROTEST OF THE ALTURAS 345KV POWERLINE
CPUC Application Number 93-11-018 and BLM Case No. CACA-31406

FROM: Mr. & Mrs. Severin Balda
2470 Seneca Dr.
Reno, NV 89506-9111

We are writing you as property owners and residents of Horizon Hills General Improvement District to issue a formal protest to the above referenced project, as we are very concerned with regard to the impact of this project. We support and agree with the Board of Trustees' opinion and proposed solutions for this matter. We wish to mention some specific grounds:

One major concern is the potential health danger to ourselves and our neighbors inasmuch as the powerline will be comparatively near to many homes in the community.

A second is the noise factor of the 345KV lines whistling in the wind, which in our area are frequently above 50 MPH and often over 100 MPH. This is an invasion of our peace and quiet in this normally tranquil area.

There is additional impact to the airspace, since Washoe Medical and St. Mary's Careflights route to the north valleys and north to Susanville, California are directly over the proposed line.

The visual impact will degrade the scenic quality as well as impact property values. Peavine Mountain is becoming a popular recreational area for hikers, mountain bikers. Two points of access are Seneca and Kiowa, used by residents of the nearby Reno urban area as well as residents of Horizon Hills. People enjoy spending time at the two stock ponds on the lower flank of the mountain. The center line will span the riparian/creek environment just above the first pond. Additionally, this particular span passes within 100 ft. of an active, breeding Golden Eagle nest. Breeding of golden eagles and meadowlarks will be affected.

GP. 78-1

Page Two.

When we purchased our property (our home is now paid in full) we loved and still love the location and lifestyle of Horizon Hills.

We sincerly hope you will consider the proposed alternatives to the current routing plan.

Severin Balda
SEVERIN BALDA

Maria Marsano-Balda
MARIA MARSANO-BALDA

2470 Seneca Dr.
Reno, NV 89506

CC:
John Mendoza
Nevada Public Service Commission

Governor Bob Miller

Scott Nebesky
Truckee Meadows Regional Planning Agency

Roger Olack - SPPCO
Steven Younkin - SPPCO
Mike Reid - SPPCO

Bill Van Brugann
U. S. Forest Service
Toiyabe National Forest

U. S. Fish and Wildlife
Reno Field Station

Senator Richard Bryan

Senator Harry Reid

Congresswoman Barbara Vucanovich

Assemblywoman Joan Lambert

Washoe County Commissioners
- Jim Shaw, Chairman
- Steve Bradhurst, Vice Chair
- Grant Sims
- Joanne Bond
- Mike Mouliot

Lori Burke - Citizens' Committee
Jan Loveran - " "
Washoe Co. Planning Commission
- Development Review

North Valley Citizen Advisory Bd.

RECEIVED JUN 0 1 1995

General Public Comment Set 79

MAY 20, 1995

TO: Ms. Julie Halligan-California Public Utilities Comm.
Mr. Peter Humm-Bureau of Land Management
c/o Aspen Evironmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

FROM: Dorothy O. and Paul N. Reifschneider
12-year Residents (Homeowners)
Horizon Hills District
(2430 Haida Court
Reno, Nevada 89506)

SUBJECT: PROTEST OF ALTURAS 345 KV POWER LINE INSTALLATION ADJACENT TO HORIZON HILLS COMMUNITY--CPUC APPLICATION #953-11-018 & BLM CASE #CACA-31406

Dear Ms. Halligan and Mr. Humm:

We generally concur with specifics of Horizon Hills General Improvement District's formal protest of Alturas 345 KV power line.

In addition:

(1) Long-term health effects of low-frequency--high transmission radiation exposure are not known.

Contemplation of possible consequences is scary, indeed.

GP. 79-1

(2) Our grandchildren and other neighborhood children play around the outer perimeters of Horizon Hills development, and at the ponds over which the transmission lines will directly cross.

(3) We are elderly people and do not have the means to relocate.

Thank you.

Paul N. Reifschneider

Dorothy O. Reifschneider

Enc: Part of Formal Protest of District (3 pages)

HORIZON HILLS
GENERAL IMPROVEMENT DISTRICT

P.O. BOX 60101
RENO, NEVADA 89506
PHONE (702) 677-1174

May 10, 1995

Ms. Julie Halligan - California Public Utilities Commission
Mr. Peter Humm - Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

RE: FORMAL PROTEST OF THE ALTURAS 345KV POWERLINE
CPUC Application Number 93-11-018 and BLM Case Number CACA-31406

Dear Ms. Halligan and Mr. Humm:

We are writing today on behalf of the Horizon Hills General Improvement District and the residents and property owners that we represent to issue a formal protest of the planned routing of the Alturas 345KV powerline as we feel we will be greatly impacted by this routing decision. We are surprised and greatly disturbed at the lack of alternative routes presented in the EIS/R.

Horizon Hills is an isolated and unique community located on the eastern slope of Peavine Mountain, west of old U.S. 395. This development has been here for over 30 years, and consists of 165 1/2 acre lots and approximately 400 residents. To our utter dismay, we have only recently found out that Sierra Pacific and the CPUC plan to route the Alturas 345KV powerline directly in our 'backyard' and on the eastern flank of Peavine Mountain. The powerline will come within 2000 ft. of our community water tank, within 2500' ft. of several residences, and will substantially impact the aesthetic and recreational aspects on the Forest Service land directly behind us.

We wish to issue formal protest on the following specific grounds:

1) As a point of issue, we, Horizon Hills General Improvement District, a quasi-municipality corporation, were never informed of the potential impact to our community or of the direct proximity of the project to our community since the inception of this project. We only 'found out' through hearsay, with the first public hearings in March, even though the proposed line comes within 2000 ft. of our water tank. This is simply not acceptable and we feel

1

deceived.

2) As a result of the two public hearings in March and April, many of our residents have gotten involved, attended the meetings, and are expressing anger, distrust, and concern over the proposed routing of the powerline, for the following reasons.

a) Everyone who has purchased property in the Horizon Hills General Improvement District did so because of the rural and aesthetic aspects of the location, knowing full well that we were bordered to the south and west by Forest Service land. Peavine Mountain, particularly the area behind Horizon Hills, is a pristine wildland environment, whose integrity would be compromised, aesthetically and recreationally by the magnitude of a 345KV powerline.

b) Additionally, there is concern about the impact to property values if a project of this magnitude goes through as it will be clearly visible from every home in the District. We feel that as a small community of moderate means, we cannot absorb the impact of this project without severe and long term loss.

c) Our residents are concerned about the invasion of our lifestyles, the invasion of our peace and quiet, by having 345KV lines whistling in the wind. Winds in the area generally come from the SW and are commonly and regularly above 50 mph and often over 100 mph.

d) We are concerned greatly for the integrity of the mountain itself and for future land use appropriations should this powerline go through. If the Forest Service allows for a corridor, the land would be compromised as recreational use and could lead to future give-aways by the Forest Service.

e) Re: the recreational impact: Peavine Mountain is fast becoming a major recreational use area for hikers, mountain bikers, hunters, and off-road vehicle users from the nearby Reno urban area, as well as for the residents of Horizon Hills. Two major points of access to Peavine Mountain are through Horizon Hills: at the end of Seneca and on Kiowa. Many people access this area to spend time at two stock ponds on the lower flank of the mountain. The center line of the powerline will span the riparian/creek environment just above the first pond. Additionally, this particular span passes within 100 ft. of an active Golden Eagle nest which has a breeding pair producing 1-2 fledglings per year for the past several years. This close proximity to the riparian zone and to the eagle nest is simply not acceptable. Also, the foothills area under the proposed powerline is a significant breeding territory for Meadowlarks, who return each year in April in large numbers.

f) Although at some distance from our homes (approximately 2300'), there is still significant concern about the potential health impacts to our neighborhood through the EMF generated by such a

high voltage line. And even if the proximity to homes is not that great, persons recreating in the area will be impacted by EMFS regularly every time they walk under the lines, ride their horses, and in general pass through the area.

Additionally, we understand that 'noise along the transmission line during operations would be produced by corona discharge in wet weather.' Horizon Hills, at an elevation of 5500', often has more wet weather than Reno, whose elevation is 4500'. We have heard that the noise from a 345KV line may be as much as 40 decibels.

g) Also, we have concerns about interference that this magnitude of current might have with radio and television reception and any other signals which come over the mountain from Reno.

Additionally, we are concerned about potential air/space impacts. We would like to note that the Washoe Medical and St. Mary's Care Flights route to the North Valley's and north to Susanville, is directly over the proposed transmission line. Also, in the past, emergency fire fighting planes and helicopters take off from the Stead airport facility and fly directly over Horizon Hills and over the proposed transmission line at very low elevations.

h) Finally, the visual impact which this project will have on the residents of Horizon Hills cannot be mitigated. Our lifestyle, our homes, our peace of mind, our spiritual connectedness to the mountain will forever be destroyed by the intrusion of this 345KV powerline in our backyard.

The lines visual prominence as a foreground feature along US 395 from Bordertown to Horizon Hills would degrade the scenic quality of this major travel corridor, which has been officially designated as a scenic route.

We believe that the visual impact of this project, as well as other impacts, should be given equal weight with cost considerations.

CPUC 93-11-018
BLM CACA-31406

RECEIVED JUN 0 1 1995

General Public Comment Set 80

Dear Ms. Halligan + Mr. Humm:

I live at 825 N. University Park Loop in Reno, Nevada, I live within 1000 feet of the proposed Alturas transmission line. When I moved to this home, I realized that a power line already existed, but would never have moved here had I anticipated a power line with 130 ft towers. I opted for the natural view of Peavine over the city views and now I will have a view of your ugly power line which will only serve to increase growth and pad the pocket books of the already wealthy "power" brokers in Reno. I object! I oppose! and I am exploring all my options. (GP. 80-1)

Pamela Robert

(GP. 80-2) P.S. I have an 8 month son and I understand there are conflicting studies re: the negative impact on children under 5.

RECEIVED JUN 0 1 1995

General Public Comment Set 81

Dear Julie Halligan and Peter Humm

I'm strongly opposed to the proposed Alturas transmission line. I don't live in an area that will be asthetically effected by these lines but I sympathize those who do. I have also seen some of the views that (GP 81-1) will be effected by this project including the spectacular view of Mount Shasta from Alturas. There are better ways to bring more power to Reno that won't damage the asthetic value of Northeastern California. I urge you to cancel this project and explore these other options.

Sincerely

Doug Goodall

Doug Goodall
Po Box 9447
Reno, NV 89507

General Public
Comment Set 82

MAY 27, 1995 RECEIVED

RE: CPUC APPLICATION #93-11-018
BLM CASE # CACA 31406

TO: JULIE HALLIGAN AND PETER HUMM

I HAVE BEEN A HOME OWNER IN HORIZON HILLS FOR 15 YEARS. I BOUGHT THE HOUSE BECAUSE OF THE LOCATION. THE PROPOSED ALTURAS TRANSMISSION LINE PROJECT WILL DESTROY THE NATURAL BEAUTY OF THE OPEN AREA AS WELL AS DEVALUE OUR PROPERTY. I HAVE BEEN IN AREAS WITH SIMILAR POWER LINES AND THE NOISE THAT IS CREATED IS A MAJOR CONCERN AS WELL AS THE HEALTH RISK.

I DO NOT WANT TO SEE THIS AREA USED FOR THE PROPOSED LINE PROJECT. PLEASE SEEK AN ALTERNATE SITE.

GP. 82-1

SINCERELY,

Susan McClain

SUSAN MCCLAIN
8245 CHIPPEWA AVE
RENO, NV 89506

RECEIVED JUN 0 1 1995

General Public Comment Set 83

Re.CPUC Application #93-11-018
BLM Case# CACA-31406

Dear Julie Halligan/Peter Humm,
I am writing to express my concerns over the Alturas Powerline Project. I am very upset that this project came to light in our neighborhood at such a late date, and so few alternitives were offered. I can look out my front window and see the beauty of Peavine, and this is part of the reason I bought my house. This powerline would cut across the mountain like a huge scar. I can only imagine what this would do to my property values. How would you like to look out your front window and see this, or try to sell your property with this thing in your frontyard? My wife and I go horseback riding in those hills on the weekends, and there are always lots of people up there enjoying themselves, I'm afraid this would really spoil the whole experience. I realize that the power needs of a growing community need to be met, however I do not believe it should be at the expense of current residents and property owners!

GP. 83-1

Sincerely,
Doug Hammerson
2210 Pawnee Way
Reno, NV.89506
702-972-6757

RECEIVED JUN 0 1 1995
CPUC Application #93-11-018
BLM Case# CACA-31406
5/25/95

General Public Comment Set 84

To whom it may Concern:

I am writing to you today as a formal protest of the Altura 345 KV Powerline on the behalf of my family and also as a property owner in the Horizon Hills Community.

First of all I would like to say that we have lived in Horizon Hills for the last 9 years. With this powerline going through our community we have many concerns about the invasion of our lifestyles such as the Peace and Quiet of our area. That is one reason we chosed to live here outside of the City.

With the powerline going through we will surely be able to hear the humming and the whistling of the lines since the winds here can reach up to 100 mph.

And what about our reception for our Radios and Televisions? Will we have to get Cable T.V. another added expense to us?

Then there's Ruining the Mountain itself, the Beauty! What kind of views will we have then? Staring at Poles up to 130 ft. tall with lines swaying in the skyline.

GP. 84-1

The wildlife is abundant in this area such as the Deer that migrate, the Eagles that nest in the trees, and the fish that live in the ponds. These will all be affected since the powerlines will go right through these areas.

Since we enjoy using this area in which we live, for walking our dog, fishing, hunting, 4x4 driving we will constantly be under and around those powerlines. Which brings us to another problem which is health effects on us and our children. I'm sure not at first but what about down the road? Since we have planned on living here for a long time raising our children, Are you willing to garentee there's no harm to us living with these electrical lines?

Also when these Transmission lines are in, it can then become a open corridor for more powerlines. And when the time comes when we feel we can no longer live here because of the noise, views, health reasons etc. Will we be able to sell our home? Who would want to buy and raise children here? What will happen to our Great investment? Would you be willing to Compensate us like you would have had to do for the people of Sparks? Just since

GP. 84-1

the mention of Powerlines going through here from the papers people who have been trying to save their homes have been having a hard time of it.

There are other solutions. Why not use the already existing 1000 KV line which passes through the Black Rock Desert and along the Granite Range down to Wadsworth. The 345 KV line could be downsized to run into Reno along existing lines and the major power could be diverted further north to the Mining Industry. This would have little impact since it is a precisiting line and would effect less people and would be in a more desolated area.

What's the bottom line? What because does the common man have against large profit making Companys?

You've said you wanted to hear from the people, I just hope you'll listen and act on our pleads.

What if this was your home?

Sincerely,
The Simons Family
David Simons
Carmen L. Simons
David Simons
Nathan Simons

GP 84-1

MEMORANDUM

General Public Comment Set 85

TO: Mr. Peter Humm
Burear ot Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

FROM: Jack and Jennifer Rhodes
8425 Mohawk Ln-Horizon Hills
Reno, NV 89506

DATE: May 29, 1995

SUBT: ALTURAS 345KV TRANSMISSION LINES
CPUC APPLICATION NUMBER 93-11-018 AND BLM CASE NUMBER CACA-31406

****

We are residents ot Horizon Hills and situated in Horizon Hills to have a fine view of Peavine Mountain, the same view that you are currently proposing to obstruct with a 345KV powerline. We have a wonderful unique placement on the slope of Peavine, close to Reno yet far enough away to be above the smog line with views to rival those living on the slopes of Mt. Rose. The property values have steadily climbed as more and more people have "discovered" Horizon Hills. We also have the benefit of a community well that we currently run with a General Improvement District. Your proposed route will come within 2000 ft. of this community well. Many residents of Horizon Hills, including us, are horse owners and ride regularly behind Horizon Hills on Peavine, crossing and recrossing the "proposed" corridor. We regularly take our children to fish and bird watch at the two stock ponds located nearby. The same ones that are located on your corridor. During high fire years as they have all been lately, sky cranes have frequently used these same ponds to fill up their buckets to drop on nearby fires. This will no longer be possible with a powerline so near. This same corridor is the current flight route for the emergency care flights for Washoe Medical and St. Mary's Hospital. GP 85-1

Sierra Pacific Power Company, in it's "monopoly" view, did not see fit to inform us of it's intent to impact our community with the corridor's proximity to us, until it came out at public meetings in March and April, although it was quick to deny running gas lines into Horizon Hills as being not "economically feasible".

Make no mistake, we are concerned and unhappy to be deceived. We are anxious about the impact on property values, visual hindrance, the EMFS potential harm, the transmission line "noise" which has been known to spook animals, the interference with radio and television reception, the air/space impact, and the access to Peavine Mountain which would compromise it's recreational use. GP 85-1

While we recognize that there is an ever increasing need for more power, we do not recognize the necessity to directly impact populated areas with unnecessary corridors. Since we the power consumers will end up paying for this powerline anyway, we'd rather bury the lines which go by populated areas, or follow the currently in use corridor. Please do not adversely impact Nevads's residents.

Sincerely.

Jack and Jennifer Rhodes

RECEIVED JUN 0 ? 1995

CPUC Application # 93-11-018
BLM CASE # CACA-31406

General Public Comment Set 86

ROBERT E. WINCHELL
8155 SENECA DRIVE
RENO, NV.89506

JULIE HALLIGAN/PETER HUMM
C/O ASPEN ENVIRONMENTAL GROUP
30423 CANWOOD STREET,SUITE 218
AGOURA HILLS,CA. 91301

I AM WRITING THIS LETTER AS A CONCERNED RESIDENT OF HORIZON HILLS SUBDIVISION AND A NATIVE NEVADAN.

I MOVED TO HORIZON HILLS APROX. SEVEN YEARS AGO BECAUSE OF THE BEAUTY OF THE HILLS ,THE QUIET RELAXED ATMOSPHERE,THE ACCESS TO OPEN LAND AND WILDLIFE. DURING THIS TIME MY GRANDAUGHTERS,AND NOW MY GRANDSONS HAVE WALKED THE HILLS TO THE PONDS. WE'VE SEEN DEER QUAIL,COYOTES,AND OTHER WILDLIFE. NOW THE POWER COMPANY DECIDES TO TAKE ALL OF THIS AWAY FROM US.

I HAVE LIVED IN NEVADA ALL OF MY LIFE AND HAVE WATCHED THESE SCARS PUT ON OUR COUNTRY. THEN WHEN THEY WANT ANOTHER ONE THEY DON'T EVEN CONSIDER FOLLOWING THE OLD LINE THEY JUST MAKE MAKE A NEW SCAR.

MY CONCERNS WITH THIS MONSTROSITY THE POWER COMPANY THREATENS US WITH WILL UPSET THE WHOLE REASON FOR LIVING IN THIS SEMI-SECLUDED SUBDIVISION.THE WILDLIFE WILL BE DRIVEN AWAY,THE BEAUTY WILL BE GONE FOREVER, PROPERTY VALUES WILL NEVER RECOVER, EMF IS DEFINITELY TO BE CONSIDERED,AND THE NOISE MUST BE CONSIDERED.

THERE ARE ALTERNATE ROUTES THAT ALREADY HAVE LINES THAT COULD BE CONSIDERED, WHY MUST IT COME SO CLOSE TO A COMMUNITY OF PEOPLE THAT ARE HERE TO GET AWAY FROM THIS TYPE OF INTRUSION.

THE FACT SHOULD ALSO BE CONSIDERED THAT HUNDREDS OF PEOPLE FROM LEMON VALLEY,GOLDEN VALLEY,STEAD, AND SURROUNDING AREA'S GO INTO THIS TO TARGET PRACTICE MAKING THIS LINE DANGEROUS.

THANK YOU FOR TIME AND CONSIDERATION.

GP 86-1

ROBERT E. WINCHELL

Robert E. Winchell

RECEIVED MAY 30 1995

May 24, 1995

General Public Comment Set 87

Project EIR/S
Julie Halligan / Peter Thomas
CPU # 93-11-018 - Case # CACA-31106
Re: Altura Transmission Line

We are writing in regards to the power lines about to disrupt our beautiful County here in Madeline.

We enjoy the view from our home looking west where we heard the lines might be. To have to look at 80 foot towers is appalling.

Not only will the lines be an eyesore but the environmental impact will be devastating to our wildlife, and to top it off our property values will be worth zero. I can't imagine anyone buying a home with ugly power lines for a view.

We enjoy seeing up in the morning and watching the Gallinas & geese. The bald eagles live close by on Robinson Rd. And a family of Coyote live on the hill over we off Alvin Rd. There is a lot of wildlife out where lines are proposed.

GP. 87-1

2

Everyone we speak with is against your project from Altura to Tenaya. Don't we the people have the right to protect our lands? Do some of us not have the right to say whether or not Power lines can go through our property? We thought Americans owe the land & the free!!

We are praying the lines will go through our areas where they don't have to be seen from our homes or properties.

This is our input. We sincerely hope it helps our cause.

GP. 87-1

Sincerely,

Jesse & Dolores J. Carter
P.O. Box 85
Madeline, Ca 96119

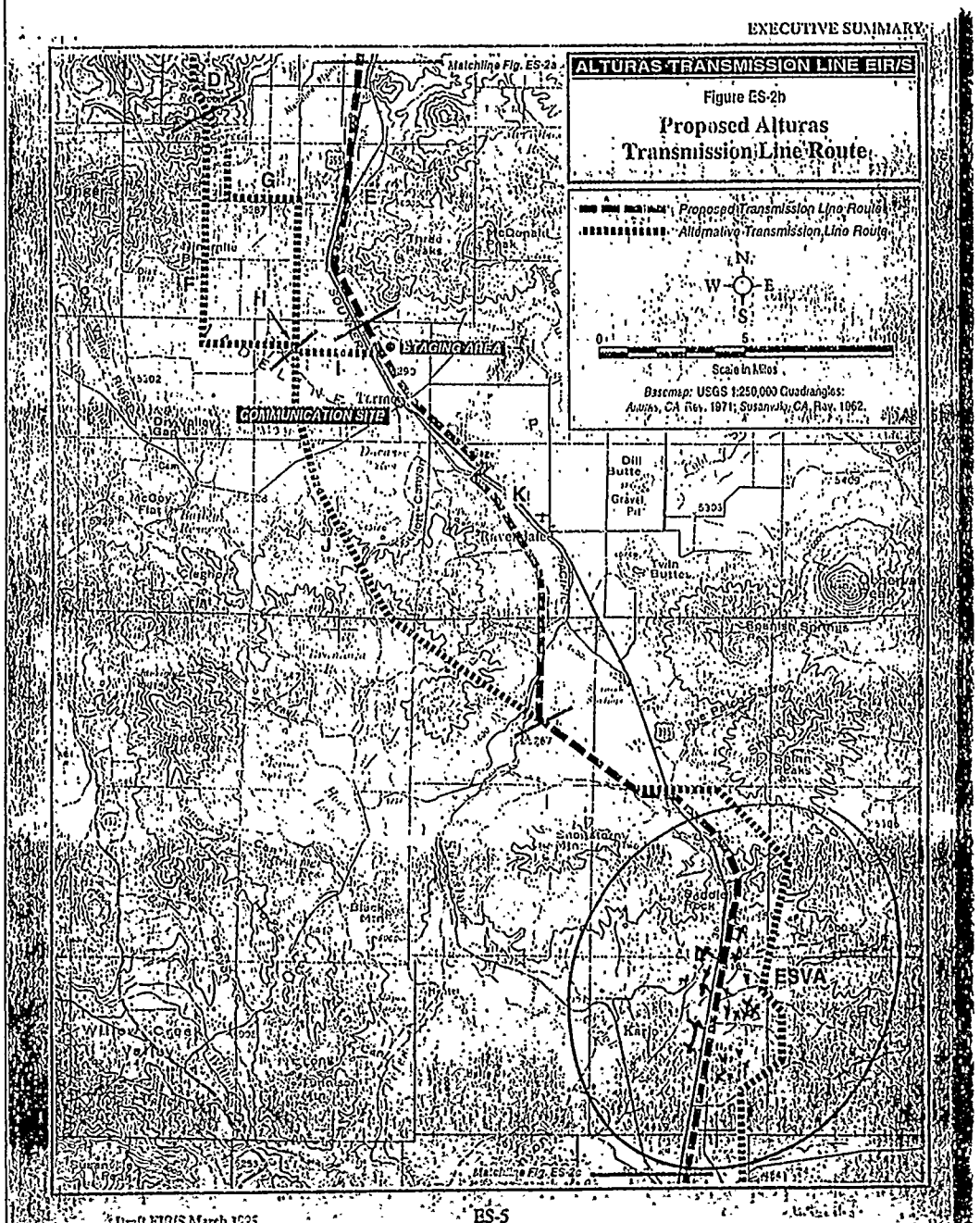
Draft EIR/S Comment Sheet RECEIVED JUN 0 ? 1995

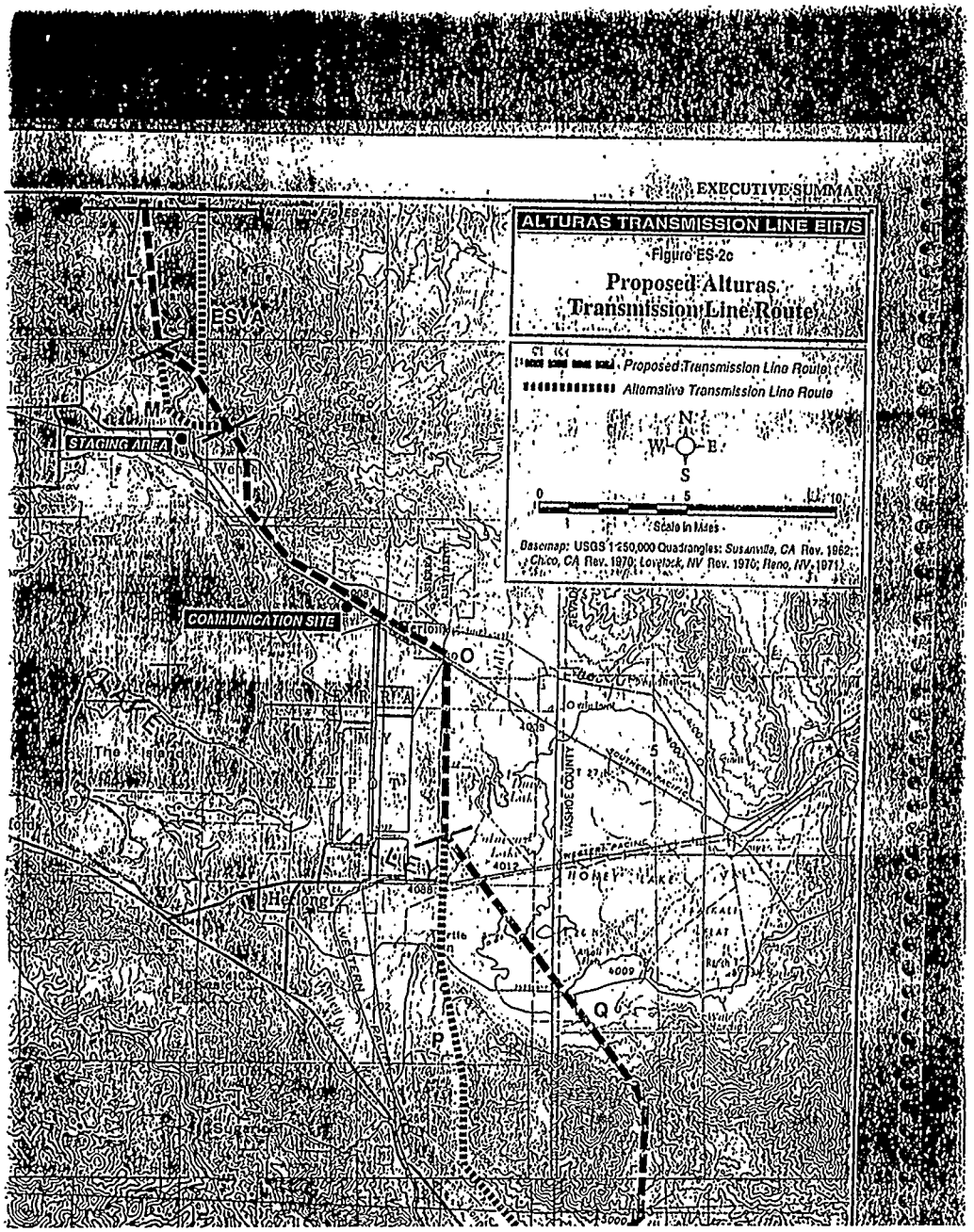
Proposed Alturas Transmission Line
General Public Comment Set 88

Name: Ronald + Rosemarie Bejek
Affiliation: Property Owner in area of Concern
Address: PO Box 369
City: Standish State: Ca ZIP: 96128
Phone: (916) 257-6009 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

This is in behalf of the location of the Alturas Intertie line.
There are about 50 property owners + families in this area which have been trying to get electricity. We are all located in the smaller 15 mile area here in Desert Valley; Mud Hot. We have no electrical source now + will not obtain any benefit from AT power line. To put this line thru our front yards, scenic Corridor, of all the property owners would be an injustice.
As your map shows an alternate route which would place the line in back of and out of the main stream would benefit us all.
GP. 88-1 I have included a map of the area of concern and checked where the homes are in this area. Since we are so isolated and there is so much wide open spaces around us, this doesn't seem to be an unreasonable request of on behalf of all property owners.
When electricity does come to this area more people will build on their property.
Please consider this alternate route in our behalf and not clutter our scenic Corridor which is our front yard. Thank you.
Rosemarie Bejek.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.




ALTURAS TRANSMISSION LINE EIR/S
Figure ES-2c
Proposed Alturas Transmission Line Route
Proposed Transmission Line Route
Alternative Transmission Line Route
N
W
E
S
0
5
10
Scale in Miles
Basemap: USGS 1:250,000 Quadrangles: Susanville, CA Rev. 1962; Chico, CA Rev. 1970; Lovelock, NV Rev. 1970; Reno, NV, 1971
ESVA
STAGING AREA
COMMUNICATION SITE
WASHOE COUNTY
HONEY LAKE
O
P
Q

5-30-(

RECEIVED JUN 0 2 1995

Ms. Julie Halligan: California Public Utilities Commission
Mr. Peter Humm - Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA. 91301

General Public Comment Set 89

Re: Protest of the Alturas 345 KV Powerline
CPUC Application Number 93-11-018
BLM Case Number: CACA-31406

From: Wes and Monique Herbst
2275 DaKota Way
Reno, Nevada 89506
702-677-1331

To Whom it May Concern,

We are property owners in the Horizon Hills Improvement District and we are extremely upset over the planned routing of the Alturas 345 KV Powerline. This is in addition to the letter sent by the Horizon Hills General Improvement District on behalf of all the property owners that listed several specific reasons why we are against the 345 KV Powerlines.

We looked for 2 years before purchasing our home in May of 1993. We wanted a home in a quiet community with some property and most of all a home that was next to Forest Service land. This was extremely important to us. We both grew up in a small town and wanted our boys to experience the same outdoor freedoms that we were brought up with. That meant finding just the right home next to forest land that we could use and enjoy everyday day and at the same time teach our children the values of our forest lands and how to preserve and protect what little wildlife and wild land there is. GP 89-1

5-30-95
Pg. 2

Our home was a HUD home with a tremendous amount of work needing to be done before we could even live in it, but it was close to forest land and the view of Pevine Mountain through the entire Living Room was absolutely spectacular. Despite the houses condition, we fell in love with the view and bought the house. This summer we are planning to rebuild the deck on the North side of our home for the sole purpose of being able to sit outside and enjoy all the beauty Pevine has to offer. The first thing we do every morning is open our drapes to see the mountains. We love watching the storms roll in and enjoy spotting all the wild life.

Not only do we enjoy the view, we use the Mountain for recreation almost daily. My husband and I both run on the Mountain with our dog, and now have our boy's into running the Mountain. We also enjoy target shooting, hiking, Bike riding, and swimming at the ponds. Where else in Reno can you walk out your back door and enjoy what nature has to offer you?

GP. 89-1

5-30-95
Pg. 3

I know if we would have been aware of the 345 KV Powerlines possibly going up, It would have greatly influenced our decission in NOT purchasing this home. We know if the powerlines do go up it will definatly effect our property values.

We personally feel by routing the Alturas 345 KV Powerlines through the Pevine Mountain Range is as comparable as someone taking a can of spray paint and defacing state property. It was our understanding that the Pevine Mountain property was owned and protected by Forest service land and that no one would be able to destroy the beauty of it. It's hard to describe the magnitude of how these powerlines would effect each and every one of us in the Horizon Hills General Improvement District.

We are very surprised that more alternatives were not offered, including using the 395 Freeway right a ways. I'm also aware that Europe puts their transmission lines underground. It might

GP. 89-1

5-30-95
Pg. 4

not be cost efficient for the U.S., how-
ever, we would be willing to pay a few
dollars more on our monthly power bill
than to jepordize our personal property
values and destroy the natural beauty of
the lands.

I'm not familer with but very
concerned about what type of health
risk my family and I could be under
with our daily use of Pevine from
EMF. I would like to know what
types of tests were preformed and
in what length of time. We would also
like to know if the tests were Federally
approved, We are also concerned about
the Noise impact from the 345 K.V.
powerlines. We are a very quiet commun-
ity, we enjoy listening to the sparrows
sing in the morning and the crickets
chirp at night and we'd like to keep
it that way. We understand that the
wind and moisture have a bearing on
the humm of ths powerlines. The winds
coming off of Pevine can be tremendously
strong, at times over 100 mph. A large
majority of houses in Horizon Hills have
lost many roofing shingles due to the
high winds. We are also 1000 feet
higher elevation than Reno, consequently
recieve a greator amount of snow
and rain.

GP 89-1

5-30-95
Pg. 5

We also believe the 345 K.V. power-
lines would be in a direct line to create
a magnetic f field (a curtain like
effect) that would block signals
coming from the relay towers off of
Pevine Mountain and causing problems
with our local television stations and
A.M. Radios

As far as rescue and fire impediments,
that goes without saying. We have had several
neighbors that have needed care flight,
their route takes them directly over the
proposed transmission lines. Fires on Pevine
are always a possability and all acceses
to contain them should be clear.

We moved to Horizon Hills for the beauty,
peace and quiet of the country. Putting in
the Alturas 345KV Powerline would destroy
everything we were looking for and ever wanted
in our home. We sincerely hope another
alternative will be found so as our
property values and life styles will not
be destroyed!

GP 89-1

Sincerely,

Monique Hadnot

RECEIVED JUN 8 2 1995

General Public
Comment Set 90

May 30 1995

Julie Halligan/Peter Humm
CPUC/BLM, c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, Calif
91301

Dear Sir and Madam:

I wish to protest the Long Valley route for the Alturas transmission line project. Long Valley is a natural treasure and should be spared the abomination of a transmission line. NIMBYism is appropriate in this case when the backyard is such an relatively unspoiled beauty. If a transmission line is necessary at all, and many people are far from convinced, let them run the sucker through the Smoke Creek desert. GP. 90-1

Thank you for your consideration of my protest.

Sincerely yours,

Richard Cook

Richard Cook
10235 White Owl Dr.
Reno, NV 89506

RECEIVED BY

RECEIVED JUN 1 2 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills
CA 91301

General Public Comment Set 91

5/27/95

Dear Ms. Halligan and Mr. Humm,
I am sending this letter in regards to CPUC Application Number (93-11-018) and BLM Case Number (CACA-31406). I live with my family in Long Valley California where the line is passing through. Please do not allow the line to go through this beautiful valley, my home. I understand there are other places to put this line which already have electrical towers.
Please address these concerns and do not allow Sierra Pacific to force this project through which will only take from and not benefit us. GP 91-1
Sincerely,

Roy A. Bogart

Roy Bogart
Doyle, California

General Public Comment Set 92

Ken Bogart
1503 E 2nd
Reno, NV 89502
May 29, 95

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills
CA 91301

Dear Ms. Halligan and Mr. Humm,

I have property in Long Valley in which CPUC Application Number (93-11-018) and BLM Case Number (CACA-31406) are a proposal to construct a power line.

I have strong objections to this line going through Long Valley at all. It would destroy the character and scenic value of Long Valley in our life time and for future generations.

I understand there are already existing corridors which could be used without destroying a pristine area. Also, the real need for this line has not been adequately shown. GP. 92-1

Sincerely yours,

Kenneth E Bogart

RECEIVED JUN 0 2 1995

Robert & Carole Heim
2220 Pawnee Court
Reno, Nevada 89506

General Public Comment Set 93

Ms. Julie Halligan / Peter Hamm
CPUC / BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca. 91301

Re: Formal Protest of the Alturas 345KV powerline.
CPUC Application No. 93-11-018 and BLM Case Number CACA-31406.

Dear Ms. Halligan and Mr. Hamm:

I'm writing on behalf of the Hanson Heights Area where we have resided for the past 18 years to protest the planned routing of the Alturas 345KV powerline. We are an isolated community located on the eastern slope of Peavine Mountain, west of old U.S. 395, where we chose to reside. The area is separated from the large population of Reno and elevated from the daily smog — a clean, fresh foothill mountain area away from major noise and traffic.

GP. 93-1

We would consider the power line a visual impact on property values and would compromise the recreational use which could lead to future give aways by the Forest Service.

GP. 93-1

I'm totally amazed that more alternatives were not researched before deciding to run a small, secluded community. There are existing power routes which could be utilized by carrying the additional capacity and then downgrid into the Reno area.

Please put this power line in a less populated area to make it better for people, wildlife and landscapes.

Respectfully Yours,
Robert & Carole Heim
2220 Pawnee Court
Reno, Nevada 89506

RECEIVED JUN 05 1995

Oceanside, Ca.,
May 29, 1995.

General Public Comment Set 94

To Judie Halligan and
Peter Humm's

I am protesting the Alturas Transmission Line Project EIR/S..

I own 40 acres near the Honey Lake area and do not think we need this amount of electrical transmission going over my property as I have stated before.

The health and beauty of California should not be destroyed by this line. Nevada would be the correct way to bring down the line, if Reno needs the electricity. GP. 94-1

Sincerely,

Flavia S. Poole
(Mrs. Phillip Poole)

CPUC application number (93-11-018)
BLM Case number (CACA-31406)

RECEIVED JUN 05 1995

General Public Comment Set 95

May 20th, 1995

JULIE HALLIGAN (CPUC), PETER HUMM (BLM)
Aspen Environmental Group
30423 Canwood St.
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC #93-11-018,BLM #CACA 31406

Dear Ms. Halligan & Mr. Humm,

On page C. 3-70 of the DEIR, it states that no construction or maintenance activities shall be performed during the period when the soil is too wet to adequately support construction equipment (defined as when equipment creates ruts in excess of six inches deep).

First of all, this language is used only as an addition to other off site mitigation in conjunction only with volcanic vertisol plant communities. It should be clearly extended to include all construction activities. It is absurd to imply that constuction equipment will be allowed to create ruts in excess of six inches deep anywhere or at any time. The impacts that would be necessary to rehabilitate these ruts would be nearly as bad as the creation of a new access road! Wood cutters are not allowed on Forest Service or BLM land when the ground is wet. Why should heavy construction equipment?

Secondly, ruts of six inches are too deep. Three inches would be more appropriate. GP. 95-1

Shawna L. Brutton
P.O. Box 1381
Alturas, Ca 96101

cc: Bureau of Land Management
United States Forest Service

RECEIVED JUN 0 5 1995

UNIVERSITY OF NEVADA SCHOOL OF MEDICINE
Cathy S. Endo, M.D.
Resident
Family Medicine Center
Department of Family and Community Medicine
Brigham Building/316
Reno, Nevada 89557-0046
(702) 784-1533

May 31, 1995

Julie Halligan/Peter Humm
CPUE/BLM
c/o Aspen Environmental Group
30423 Canwood Street #218
Agoura Hills, CA 91301

RE: Formal protest of the Alturas 345KV Transmission Line
CPUC Application # 93-11-018, BLM Case # CACA-31406

General Public Comment Set 96

Dear Ms. Halligan and Mr. Humm:

I am writing today as a resident of Horizon Hills, an isolated community on the eastern side of Peavine Mountain, to formally object to the proposed routing of the Alturas 345KV powerline, which would pass less than 2500 feet from this community. Horizon Hills is in a harsh, windy location that I, like other residents, am willing to tolerate in return for the privacy and beauty offered by such an area so near to the urban center of Reno. The powerline project would surely destroy these qualities.

Because I live in Horizon Hills, I am of course very concerned about the severe impacts that this project will have on the local environment of Peavine Mountain, on property values and quality of living due to unsightliness and noise pollution in Horizon Hills, and on recreational use of the foothills in which our community is located. But because I am also a physician with the Family and Community Medicine clinic at the University of Nevada, I can speak with some authority about a more general concern - that recent research strongly indicates that the electromagnetic fields (EMF) associated with such transmission lines constitute a health hazard. EMFs have been shown to correlate with increased risk of certain types of cancers and to interfere with the operation of cardiac pacemakers. Thus, to route this powerline so near to our community and in the Peavine Mountain area, which provides a major recreational get-away for the entire Reno area, is surely a public health risk. GP 96-1

I understand that the Environmental Impact Statement written for the powerline project includes a glaring lack of alternative proposed routes in spite of the fact that reasonable alternatives exist that would have less impact on fewer people. I respectfully urge that, if the powerline is absolutely necessary, the proposed route across the Peavine foothills be discarded in favor of such an alternative route.

Sincerely,

Cathy S. Endo, MD

Cathy S. Endo, M.D.
Department of Family & Community Medicine
Brigham Building/316
University of Nevada
Reno, Nevada 89557-0046

RECEIVED JUN 15 1995

JUNE 1, 1992

FROM: Ruth H. HART
2428 Haida Court
Reno, Nevada 89506
TEL: (702) 972-1561

FORMAL PROTEST

General Public Comment Set 97

TO : Julie HALLIGAN/Peter HUMM
CPUC/BLM
% Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

SUBJECT: ALTURAS INTERTIE LINE
CPUC Application No. 93-11-018
BLM Case Number CACA-31406

Dear Sirs:

I am a 31 year property owner in HORIZON HILLS GENERAL IMPROVEMENT DISTRICT and I am writing to PROTEST in the strongest terms the current proposed route of the ALTURAS Transmission Line to Reno.

When I purchased my property in 1964, several things were the deciding factors before I bought here. (1) That this DISTRICT abbuted BLM land (which has since been swapped with the U.S. Forestry Service), which meant that the land behind us would remain in its pristine, undeveloped condition.. and (2) My families view of PEAVINE MOUNTAIN would also remain unobstructed. Both factors that contribute to my peace and mental health. (This is a VERY IMPORTANT condition for me, personally!).

(3). I am also very concerned about the following negative impacts. (Intolerable).

a. My property value will decrease to a point that I cannot recoup the current value of my home and property. Are the current merging parties (Sierra Pacific Power Company with Washington Water Power) prepared to buy out damaged property owners?

b. Ruination of the visual beauty of Peavine Mountain.

c. Disturbance of current wildlife INCLUDING a pair of nesting EAGLES whose nest is within 100 feet of the proposed route.

GP. 97-1

d. Noise impact, as winds have reached 90 MPH at this altitude, and 50MPH is NOT uncommon.

e. Rescue and fire impediments.

f. Possible health risks from EMF's .

d. Loss of recreational use of the foothills

I DO NOT believe this magnitued of power is necessary for the electrical needs of the people of Reno/Sparks area, but instead it will provide the means for economic strenth and MAJOR financial gain for Sierra Pacific to sell its commodities to future purchasing entities.

In closing, I am begging you to abandon the current proposed route thru Long Valley, Boardertown, behind my home in HORIZON HILLS etc., and USE existing corridors.

Sincerely,

Ruth H. Hart

RUTH H. HART, property owner

cc: Washoe Co.Planning Commission
Assemblywoman Joan Lambert
Washoe County Commissioners
Lori Burke - Citizen's Committee
Governor Bob Miller
John Mendoza, Nv Public Service Commission
Scott Nebesky Truckee Meadows Pre.Planning Ag.
Bill VanBrugann,US.Forest Service (Tolybe)
U.S.Fish & Wildlife (Reno Field Station)
Sen. Harry Reid

RECEIVED JUN 0 5 1995

May 24, 1995

Attention: Julie Halligan, Peter Humm
CPUC/BLM
Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, Calif. 91301

General Public Comment Set 98

Subject: Alturas Intertie
CPUC #93-11-018
BLM #CACA 31406

Dear Ms. Halligan and Mr. Humm,

This statement is taken out of the environmental impact report; "Where feasible, avoidance of significant resources by project design is the preferred option, because by avoiding resources no significant impact would result." While this statement was made in reference to cultural impacts, the same holds true for all concerned resources. The environmental report makes no attempt to do this. The public and government agencies have identified specific concerns and areas that they consider to be sensitive. Certain of these areas can be avoided (for example the north end of Daggert Canyon and the area of the Infernal Caverns), but the attempt has not been made.

Even though the line does not cross the Infernal Caverns directly, it does impact the area visually and can be better realigned to avoid this impact. GP 98-1

Coming near or crossing over the relatively deep head of Daggert Canyon and skyling ridges and predominant features as the line makes it's way around the canyon is heavily opposed by the government and people, and they have voiced this. Crossing the Pit River meadow land at it's widest part has also been opposed as it creates too many impacts. Yet there continues to be no attempt to avoid these areas.

The public, government agencies and the environmental report have identified certain areas that are sensitive. NOW is the time to find ways to avoid them (not one year ago, before sensitive areas were completely identified). Please make sure to address this.

Thank you,

Larry and Kathy Brown
311 S. Main St.
Alturas, CA 96101

MAY 15, 1995

RECEIVED JUN 0 5 1995

General Public Comment Set 99

Julie Halligan/Peter Humm
CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC #93-11-018, BLM #CACA 31406

Dear Ms. Halligan & Mr. Humm,

Wetlands associated with seasonal streams and vernal pools were not properly addressed in the DEIR. They could not have been, as the studies done in the DEIR were done at the end of a seven year drought. The only other way to gather information would be to look at previous studies that were done over seven years ago, and I see no evidence that this was done in regards to these wetlands and doubt that sufficient studies are even available. In this unique, semi-arid part of our state, these wetlands are critical. During periods of repeated wet years, these areas hold moisture for long and critical periods of time. Due to the shallow, fragile nature of these areas, even a minor impact (such as off road ruts from vehicles) can totally destroy them.

The nothern portion of Segment A is a good example of how these wetlands are being totally overlooked. In the first few miles of the Project, it crosses several drainages and vernal areas. Rock Creek is crossed in two places and yet these stream crossings are totally ignored in the DEIR. The fact that wetlands may not hold water above the surface year round is no reason to dismiss them as being insignificant. In an arid area, such as this, life evolved from and revolves around transient pockets of moisture. It may not be evident during dry years, but it certainly is important in this high desert area. In the base of Daggert Canyon, Rock Creek widens and spreads out through large boulders providing shelter and held moisture for a variety of plants and animals. Any upstream activities could heavily impact downstream wetlands. If upstream drainages are changed, downstream silting of shallow, fragile areas could occur when seasonal runoff happens. GP 99-1

The DEIR does not take into consideration the semi-arid nature of the Modoc Plateau, the uniqueness of the situation and the importance of transient wetlands and seasonal variations. It is a poorly written document that does not address near the impacts that would occur as the result of this Project.

Sincerely,

Tom and Lynda Grimme

Tom & Lynda Grimme
HC 4, Box 42522
Alturas, CA 96101

RECEIVED JUN 0 - 1995

RECEIVED JUN 0 - 1995

General Public Comment Set 100

May 30, 1995

Ms. Julie Halligan-California Public Utilities Commission
Mr. Peter Humm-Bureau of Land Management
C/O Aspen Environmental Group
30423 Canwood Street, #218
Agoura Hills, CA 91301

RE: FORMAL PROTEST OF THE ALTURAS 345KV POWER LINE
CPUC Application Number 93-11-018 and BLM Case Number CACA-31406

Dear Ms. Halligan and Mr. Humm:

This is letter to protest putting the Alturas 435KV Transmission Line behind my home in Horizon Hills in Reno, Nevada.

I am furious we never had the courtesy of a letter from Sierra Pacific Power Company, or anyone directly connected with this. My husband and I never heard of it until there was a County Commissioners meeting in Lemmon Valley on April 12, 1995. I'm still talking to different people who live at Raleigh Heights and they have not been informed. GP. 100-1

It angers me that Sierra Pacific can be so callous in their regard of homeowners in the North Valleys. I realize most of the homes are not as expensive as the ones in Spanish Springs, but we work hard to pay for our homes and we value them as much as the people in Spanish Springs.

With all the open area in Nevada, why isn't another route chosen? Why is someone in California making decisions for us in Nevada? Why is everyone so intent on ruining our property values and the lifestyles? Are you planning to pay the difference in my property when the value goes down because of the Transmission Line? GP. 100-2

Sierra Pacific says it has not been proven that EMF's are a health hazard. But they also cannot say for 100% that they aren't. GP. 100-3

I get extremely nervous living in town, so we moved to the country where it is much quieter at night when I need it quiet. So, if the lines are humming and blowing in the high winds we get in our area, are you telling me that I must close all my windows so I can't hear the noise, because I become extremely nervous when there is lots of noise at night and I can't sleep. GP. 100-4

I sincerely hope that you consider another alternative that will be acceptable to all.

Thank You.

Yours Truly,

Delores Ray

Francis Ballard
P.O. Box 918
Alturas, CA 96101

RECEIVED JUN 0 5 1995

General Public Comment Set 101

May 30, 1995

Julie Halligan/Peter Humm
CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA 31406

Dear Ms. Halligan and Mr. Humm,

Please review and correct:
Page C.8-41 (bottom) of DEIR, under the Modoc County General Plan discussion, it states "Although interference with adjacent land uses would be minimized by the rural location of the proposed route, several residences would be exposed to aesthetic impacts from the transmission line".

The aesthetic values that would be degraded by the presence of the project is down played due to the rural nature of the area. The skylining of Segment A, just north of Hwy. 299, however, would impact more than just a few residents. The project in this location would provide a predominant feature of the Modoc landscape, and would be visible for many miles from essentially any direction. Even if it is in the background, it would disrupt the open views we are accustomed to seeing. GP. 101-1

Sincerely,

Francis Ballard

Francis Ballard

RECEIVED JUN 0 ' 19

Thomas R. Anderson / PO Box 1119 / Point Reyes / CA 94956

General Public Comment Set 102

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills
CA 91301

RE: CPUC Application Number 93-11-018
and BLM Case Number CACA-31406

6/1/95

Dear Ms. Halligan and Mr. Humm,

I would like to respond to the DEIR/S. I have reviewed the executive summary and the 1000-page report. In regard to my private land, which Segment W passes through, alternative Z is definitely a preferable route according to the evaluation criteria, and passing to the east of Z, up against the base of the mountains, would be even less offensive. GP. 102-1

However, after consideration of the entire project, I believe the wisest decision would be not to allow this project to be built. As a responsible citizen, and after careful analysis, I believe there is no true absolute need for this project and that it should not be built at all. If SPPC insists on building this line, then it should follow an already existing corridor to the east. It is obvious that the preferred route would maximize corporate profits for SPPC, but it would create "significant" and "unmitigatable" impacts in a relatively pristine area. GP. 102-2

It is a misleading, confused, and flawed analysis to conclude that establishing the proposed new utility line and corridor in this unique, scenic, and pristine environment has an overall advantage to other transmission alternatives. The public welfare would not be served if this project goes forward as proposed. The only clear advantage the proposed project has is to enable SPPC to do exactly what it wants and establish a new utility line and corridor in a scenic and pristine area. The proposed project would blatantly disregard the scenic and natural value and establish future precedents for other projects which similarly ignore the will of the government, people, and welfare of future generations with unmitigatable and unacceptable degradation of public and private lands in the name of corporate profits. The existing EIR/S barely addresses these concerns. GP. 102-2

My conclusion is that the public interest will be permanently injured and the integrity of the environment will be gravely compromised if this project is allowed to go forward. Please give careful consideration to my concerns.

Sincerely,

RECEIVED JUN 0 7 1995

General Public Comment Set 103

May 26, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street
Suite 218
Agoura Hills, CA 91301

CPUC Application Number (93-11-018)
BLM Case Number (CACA-31406

Dear Ms. Halligan & Mr. Humm:

This letter is in reference to the Alturas Transmission Line. We live in Reno & not far from the proposed Power Line, closer than we would like to be. It will also be real near to a large group of apartments which are close to us. For us personally, we would rather not have it where it appears it is going to be. We would sure like the Power Co figure out some other way to get the power to this area for all the wanted or not wanted developement! Isn't there any other way.....(with all our great technology)....to get this power here? Nothing is being said about the potential dangers of the EMF's and so many people effected! We still don't know all the potential dangers till maybe it will be too late! Then there are the effects on our beautiful open spaces, & especially the areas near to other towns & especially the impacts on our most beautiful Regional Park, Rancho San Rafael. The proposed line would not pass through the existing park boundaries, but it could if a land exchange with the Us Forest Service is arranged as possibly planned, unless there have been changes that have not been told. Just too many unanswered questions by many people!

What a terrible blight on the Horizon.....As high as 130 Feet..... much larger than any existing facilities,... 345,000 Volts.....& encompassing so much area. This will surely destroy any open space concept in our area! Sierra Pacific officials emphasize that the line is generally located far from housing...Some will be living within a half mile....What does Generally mean & how Far is Far enough...Do they really know? Especially with such huge transmission Lines! Who does know?

It surely doesn't seem wise to open up a new power corridor, it is such a very serious matter, especially when there are so many issues that don't appear to have been adequately addressed to all concerned. Such things as the effect on the peaceful setting of Rancho San Rafael, the areas of future expansion, the effect on the residents of the North Foothills apartment complex at Talus Way & N. Virginia, & on all future people, such as in the area to be developed in the University Ridge Residential area, and the unknown effects of the EMF's on all living creatures including we Humans. If it were at all possible to go underground in the heavily populated areas, would that help.?...Such a problem! But many things need to be considered and it seems that only the Power & Greed of Sierra Pacific is the only thing being considered.

GP 103-1

We feel that all citizens effected, even by proximinity, should be considered! Not just the developers & the Power Co. Please get all the POWERS THAT BE, together & consider all that would be effected, before making that huge final decision!

Thank you for the privilege to be heard & for taking the time to hear us.

Sincerely yours,
Mr + Mrs C. Wilson

Mr. & Mrs C. Wilson
3694 Shale Court
Reno, Nevada 89503

RECEIVED JUN 0 5 1995

General Public Comment Set 104

June 1, 1995

Julie Halligan and Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 92301

Dear Ms. Halligan and Mr. Humm:

I am writing this letter as a concerned property owner and resident of the Anderson Acres subdivision, Reno, Nevada. The proposed route of the Sierra Pacific Power Company Alturas-Reno Transmission Line Project is approximately 2,000 feet from my home. The proximity of this project to my home is of serious concern to me for several reasons.

I bought property and moved out here because of its expansive views (hence, the name of my street is "Longview Lane"). It's near to U.S. Forest Service land which begins at the end of Longview Lane. Construction of this proposed transmission line will seriously affect the aesthetic quality of my home and the vistas. I will be forced to look at about ten of the unsightly iron giants every time I glance at Peavine Peak. When atmospheric conditions are right, I will also be forced to listen to their cacophonous hum. Not at all what I had in mind for my retirement years! GP. 104-1 GP. 104-2

Another reason I chose to live here is for the opportunities this area presents with regard to wild life viewing. I studied wildlife and fisheries biology at the University of Nevada, Reno and have worked for the U.S. Forest Service and the Nevada Department of Wildlife as a fisheries biologist in the past.

Milepost 156 intrudes on a riparian area and a wet meadow (in good years). I fear that these monolithic monstrosities will negatively impact these areas and the native flora and fauna. A deer herd regularly uses the riparian areas of Jeanine Creek and the associated Mountain Mahogany areas for fawning and rearing of young. Quail also successfully reproduce in the area of the proposed transmission line. Such a high energy field might detrimentally effect successful reproduction and birth. I fear the future of reproduction of our wildlife in this area. Let is also be known several species of raptor including Golden Eagle, Red Tail Hawk, Prairie Falcon, American Kestrel and Long Eared Owl have actively hunted these areas. How will 345,000 volts of electromagnetic energy affect the reproduction of their prey species? Does anyone know?? GP. 104-3

From my window, I have seen a healthy black bear, a mountain lion and a local pack of coyotes regularly and the howls of the coyotes always sings me to sleep. Will this continue to be events I can count on if the transmission line is allowed to be built? I sincerely doubt it. Will Sierra Pacific Power Company replace or compensate me for these losses? I doubt it. GP. 104-4

Another serious concern I have is all of these 130 foot lightning rods in a predominantly sagebrush, bitter brush-grass community. Winds rolling down the north side of Peavine Mountain frequently reaching speeds of 50 to 100 miles per hour. A lightning strike in this area would quickly lead to severe devastation of properties, animal life and possibly human lives. GP. 104-5

Positive consequences of the transmission line? I see none. I believe Reno has already long ago exceeded its capacity for growth although I am sure the greedy developers will always argue there is always more room to build. Look at the green air during a common winter inversion!

Sierra Pacific maintains it needs this cancer to service the mining industry needs of central and eastern Nevada. Mining is not a renewable resource. Once their lodes are depleted, so will their need for power and their need for Sierra Pacific. I will still be forced to see the folly of their fiasco daily. GP. 104-6

I urge you to use your authority to recommend denial of Sierra Pacific Power Company's request for a permit to build this transmission line. The company and its investors will be the only ones to profit from it. The thousands of people and the animal life would be affected by it presence and would suffer the loss.

Thank you for your time and consideration in this serious matter.

Sincerely,

Jerome Byczek

Jerome Byczek
11055 Longview Lane
Reno, Nevada 89506

RECEIVED JUN 0 5 1995

Craig Miller
HCR 4 Box 40506
Alturas, CA 96101

General Public Comment Set 105

May 19, 1995

Julie Halligan/Peter Humm
CPUC/BLM
Aspen Environmental
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie-CPUC 93-11-018,BLM CACA 31406

Dear Ms. Halligan and Mr. Humm,

It is suggested in the DEIR that bird flight diverters placed on the power line in sensitive areas would reduce the potential impact of bird collisions to a less than significant level. It is documented that most birds collide with the upper shield wires while attempting to avoid the power lines, yet it does not seem to be proposed that bird diverters be placed on these shield wires. There is no mitigation provided to avoid the impacts of the shield wires. Studies cited do not separate impacts caused by powere lines without shield wires compared to power lines with shield wires. The power lines at Modoc National Wildlife Refuge have no shield wires and, therefore, the assumption that aviation markers help reduce collisions is not necessarily correct. In fact, bird diverters could theoretically increase collisions with shield wires as the birds flare to avoid the more visible power lines in inclimate weather. Please provide studies to correctly document the effect of bird diverters on power lines which have guide wires with and without bird diverters. GP. 105-1

Also, please specify studies on bird collisions and benefits of flight diverter in relation to nighttime migrations and inclement weather. Studies should be specific in terms of night flights of water fowl in inclimate weather, as that is when many migrations occur in the Fall. Daytime studies, or studies that ar not specific for night/inclimate weather would not represent the total impacts on birds and the effectiveness of bird diverters. GP. 105-2

Respectfully,

Craig Miller

RECEIVED JUN 0 5 1995

Craig Miller
HCR 4 Box 40506
Alturas, CA 96101

May 20, 1995

Julie Halligan/Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA. 91301

RE: Alturas Intertie (CPUC 93-11-018, BLM CACA 31406)

To Whom It May Concern,

The Draft Environmental Impact Report by Aspen identified 91 special status plant species known to occur within the Modoc Plateau and Basin and Range Regions. It also identified 43 special status species of wildlife with potential to occur in the region. More than 100 separate occurrences of special status plants were mapped in the northern half of the proposed route (only nine occurrences in the southern half). Obviously, the Modoc Plateau area is peculiar and sensitive. The Council on Environmental Quality regulations for implementing the National Environmental Policy Act define mitigation to include: (1) avoiding the impacts. The U.S. Department of the Interior, Fish and Wildlife Service, considers the number one form of mitigation to be avoidance of the impact. The DEIR, however, makes no significant attempt to provide this type of mitigation as no alternatives outside of this region were completely studied. Aspen Environmental made no independent attempt to seek, solicit or completely study alternatives that would avoid this sensitive area. The Alturas Intertie Project is a blatant insult on a sensitive environment. Habitat after habitat can not simply be ignored because it is being "spanned". It is ignorant to think that structures that need to be maintained can be indefinitely placed over the top of a habitat, and with all our "knowledge" think that they will never be significantly impacted. GP. 105-3

Sincerely,

Craig Miller

cc U.S. Forest Service
Department of Fish & Game
Rich Burns, Alturas BLM

Craig Miller
HCR 4 Box 40506
Alturas, CA 96101

RECEIVED
JUN 05 1995

May 21, 1995

Julie Halligan/Peter Humm
CPUC/BLM
Aspen Environmental Group
30423 Canwood ST., Ste. 218
Agoura Hills, CA. 91301

RE: Alturas Intertie, CPUC 93-11-018, BLM CACA 31406.

Dear Ms. Halligan/Mr. Humm:

The environmental impact report does not study or address the impacts of the project outside of the 660 foot study corridor sufficiently. This project will impact cultural (and other) resources in cumulative ways that were ignored in the impact report. An example of this is the lack of cultural studies done where new permanent access roads would be created (blading a 15 foodt wide road) OUTSIDE of the study corridor. This occurs in three places in regards to this project. GP. 105-4

This project will have immense impacts which do not justify it's benefits. The impact report should at least be addressiong these impacts. It should be realized that the impacts will be severe and alternatives should be searched for, or the project not be built. GP. 105-5

Craig Miller

RECEIVED JUN 0 5 1995

General Public Comment Set 106

Janie Erkiaga
P.O. Box 1996
Alturas, CA 96101
(916)233-4128

May 31, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC # 93-11-018, BLM # CACA 31406.

Dear Ms. Halligan and Mr. Humm,

Please note that the citizens of Modoc County have voiced opposition to this Project since it's known inception. It is believed that the Project would be a detriment to those living in and visiting Modoc County. The Project not only impacts severely the visual aspects of the county, but also defies the Energy Element of the Modoc County General Plan. The Project makes no attempt to utilize existing utility corridors. The Project impacts sensitive natural areas (north end of Daggert Canyon recognized by the county as being an important visual asset). The Project skylines ridge tops.

GP. 106-1

The first few miles of the Project demonstrates a lack of completely studied alternatives. Both the citizens of Modoc County and the government of Modoc County feel that the two alternatives are not appropriate. Other alternatives were not studied or solicited.

Please note the enclosed resolutions from the Modoc County Planning Commission and the Modoc County Board of Supervisors. Even the City of Alturas voted unanimously (5 to 0, May 30th, 1995) to oppose this Project at its proposed location west of town. Obviously they feel the visual detriments are unacceptable and obviously they feel alternatives exist. This has been well demonstrated as a concern of the citizens and government of Modoc County. The need for alternatives for this area has been well documented, and yet there has been no detailed study of alternatives or formal solicitation of alternatives.

Sincerely,

Janie Erkiaga

Janie Erkiaga

MODOC COUNTY PLANNING COMMISSION RESOLUTION 95-06

WHEREAS, Sierra Pacific Power has submitted a request for review of the Alturas inter-tie power transmission line, and;

WHEREAS, lawful and due notice of the meeting was given by publication in the Modoc County Record and by posting in public places, and;

WHEREAS, the Planning Commission after due and careful consideration of the facts and substantial public testimony presented in connection with the request, and its effects on the health, safety and welfare of the community, find the following:

1) The Draft Environmental Impact Statement fails to comply with the following issues in the Modoc County General Plan:
   a) Segment A01 and Alternate Segment B01 fail to protect critical wildlife and wildlife habitat.
   b) Segment A01 and Alternate Segment B01 fail to protect critical views open to the public and of great value to the public.

2) Although we recognize economic benefit, we urge you to reject both Segment A and Alternate B as proposed routes.

3) The Planning Commission supports the review and comments as put forth by the Modoc County Planning Department and Modoc County Road Department.

THEREFORE BE IT RESOLVED, that the Modoc County Planning Commission adopts resolution 95-06 and recommends to the Board of Supervisors the Planning Commission Resolution 95-06.

On the motion of Commissioner Madison, and seconded by Commissioner Hamel, the above and foregoing Resolution was passed and adopted by the Modoc County Planning Commission on the fourteenth day of April, 1995 by the following vote, to wit:

AYES: Commissioners Hamel, Madison, Tolbert, Cockrell, Palmer

NOES:

ABSENT:

ABSTAIN:

Joseph Tolbert, Chairman
Modoc County Planning Commission

Patricia A. Clark, Secretary
Modoc County Planning Commission

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF MODOC

ADOPTION OF MODOC PLANNING COMMISSION RESOLUTION NO. 95-06 AND REQUEST AND ADOPTION OF MITIGATING PROPOSALS

RESOLUTION NO. 95-35

WHEREAS, Sierra Pacific Power has submitted a request for review of the Alturas inter-tie transmission line; and,

WHEREAS, lawful and due notice of the Planning Commission meeting was given by publication in the Modoc County Record and by posting in public places; and,

WHEREAS, the Planning Commission after due and careful consideration of the facts and substantial public testimony presented in connection with the request, and its effects on the health, safety and welfare of the community, adopted Planning Commission Resolution 95-06; and,

WHEREAS, this Board after due and careful consideration of all of the above, together with the comments and discussion at the regularly scheduled public hearing with regard to the above on May 2, 1995; and,

WHEREAS, the Board finds good cause therefore;

NOW THEREFORE, BE IT RESOLVED, that the Modoc County Board of Supervisors supports Planning Commission Resolution 95-06 and supports the comments made by County staff.

BE IT FURTHER RESOLVED, that the Modoc County Board of Supervisors feels that the project has little benefit to the county and that the county is bearing cumulative environmental impacts along the full length of the corridor for the service and convenience of other regions. Therefore, the Board believes that the suitable mitigation to the project should include all of the following:

05-24-1995 03:48PM FROM TO 19162574725 P.03

1. PREFERRED ROUTE:

A. In order to reduce the visual skylining effects, preferred route Sections A01 through A03 need to be moved North 300 feet and the height of the towers reduced to eighty (80) feet;

B. Sections A03 through A05 need to be buried:

2. ALTERNATE ROUTE:

A. Sections B01 through BMP3 need to be buried.

3. In order to further mitigate the impact of the project to this county and to allow the county economic benefit from the project the installation of fiber-optics telephone service to the Citizen Utilities Switching Station in the City of Alturas, should be included in the project.

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of the County of Modoc held on this 16th day of May, 1995, by the following vote:

AYES: 3

NOES: 0

ABSENT: 2

BOARD OF SUPERVISORS OF THE COUNTY OF MODOC

BY: _____
RONALD McINTRYE, Chairman

ATTEST:

MAXINE MADISON, County Clerk
and Ex-Officio Clerk of the Board

2

RECEIVED JUN 0 5 1995

General Public Comment Set 107

June 1, 1995

Ms. Julie Halligan, California Public Utilities Commission
Mr. Peter Humm, USDI Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood Street #218
Agoura Hills, CA 91301

Dear Mr. Halligan and Mr. Humm:

I would like to formally protest against the planned routing of the Alturas 345KV powerline (CPUC Application Number 93-11-018; BLM Case Number CACA-31406).

As a homeowner in the Horizon Hills subdivision on the eastern side of Peavine, I feel that this powerline would be detrimental to the natural beauty of Peavine. I have lived in this area for over twelve years, and one of my pleasures is walking my dogs up into the foothills each day. Having a power line within 2500 feet of my residence would not only be an eyesore, but would be damaging to the ecosystem of the area, not to mention health effects. GP. 107-1

It seems there must be an alternate route that would not be as damaging to the scenery, and I strongly urge you to pursue a search for a different route.

Sincerely,

Carolyn Longland

Carolyn Longland
2426 Sauk Court
Reno, Nevada 89506

RECEIVED JUN 05 1995

General Public Comment Set 108

30 May 1995

Ms. Julie Halligan -- California Public Utilities Commission
Mr. Peter Humm -- USDI-Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood Street #218
Agoura Hills, CA 91301

Dear Ms. Halligan and Mr. Humm:

This letter is written as a formal protest against the planned routing of the Alturas 345KV powerline (CPUC Application Number 93-11-018; BLM Case Number CACA-31406). I am disturbed in general about the planned routing along a scenic area of the eastern front of the Sierra Nevada Mountains just north of Reno, and in particular about the fact that the proposed routing intersects the eastern and northern flanks of Peavine Mountain. My residence is in Horizon Hills on the eastern side of Peavine, and the powerline route would pass within 2500 feet of this community. In addition to obvious personal concerns about aesthetic, property value, and health effects, etc. arising from such close proximity of this transmission line to my residence, I am very concerned about the line's environmental impact on the Peavine Mountain area. It is very distressing that the EIS/R lacks alternative plans that would not involve serious impact to this important area.

As a professional research ecologist with a US Department of Agriculture project in Reno entitled "Conservation Biology of Rangelands", I am very aware of the ecological value of Peavine Mountain. This awareness comes from a significant body of scientific literature that has been published on Peavine (for example, within the last 2-3 years an entire issue of the Great Basin Naturalist was devoted to the Peavine ecosystem) and from studies that local colleagues and I have conducted on Peavine. Peavine is truly an ecological "island" in that it hosts a diversity of unique plant and animal communities derived from combinations of floral and faunal elements from three distinct regions -- the Sierra Nevada and Cascade Mountains and the Great Basin Desert. Not only would the powerline directly impact existing plant and animal populations on Peavine, but it would also provide a direct corridor to promote invasions by introduced weed species that have not yet found their way to Peavine. A good example of the latter is medusahead wildrye; patches of this very problematic weed are already quite common from Susanville to Alturas, California, and since Alturas is the northern terminus for the proposed route, the disturbed areas along the line will provide for easy invasion. This impact is completely overlooked by the EIS/R. GP. 108-1

In an era when the developing field of modern conservation biology is emphasizing the importance of centers of biological diversity -- especially those occurring in areas of significant urban and agricultural development, like Peavine -- it is very difficult to understand why the ecological value of this area was ignored in the EIS/R. This seems to lend credence to a common belief of research biologists; i.e., that the "professional" opinions and results presented by biologists involved with private consulting are colored (if not predetermined) by the desires and agendas of the interest groups that provide their funding. GP. 108-1

I understand that viable alternatives to the proposed route exist, even though a disturbing lack of alternatives are proposed in the EIS/R. If this powerline is indeed necessary (I also understand that most of the power from this line will go to mining interests in northern and northeastern Nevada, rather than to the Reno area), then I would like to strongly suggest that such alternatives be explored rather than destroying this valuable ecosystem in Reno's backyard. GP. 108-2

Sincerely,

William S. Longland

William S. Longland, Ph.D.
Conservation Biology of Rangelands
USDA-Agricultural Research Service
University of Nevada
920 Valley Road
Reno, NV 89512

Re: CPUC Application No. 93-11-018 BLM Case Number CACA-31406
Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

RECEIVED JUN 0 5 1995

General Public Comment Set 109

Dear Ms. Halligan and Mr. Humm:

Having recently had occasion to drive from Reno to Portland and back, I feel very concerned about the proposed route of the Alturas Transmission Line Project. The landscape from Alturas to Reno is unusually beautiful. This landscape would not support plantings that could obscure the adverse visual impact of poles and lines of this size. One rationale given in the DEIR/S Exec. Summ. (page 40) for choosing this route is the "relatively few number of viewers". Yet this route will be used by an untold number of viewers over time and for generations to come. This scenic corridor has much more value than simply a means of getting from one place to another. As an undisturbed landscape it may benefit the human spirit in ways that we have not yet begun to understand or evaluate. The effects of this project will be felt for a very long time, and there is an obligation to protect the interests of future generations. Ethical and aesthetic values should be given equal weight with economic considerations because, once established and paid for, this line will probably be in place for generations. GP. 109-1

The existing corridor has served us well so far, and using it would preserve undisturbed land for future use. It is possible that technology may improve, and that engineers of the future may find less obtrusive ways to bring electricity to urban areas. As a community of providers and users, it may be worth our while to leave undisturbed land for future use.

What would be the additional cost of crossing what is a relatively small mountainous area (Cedar Pass) in order to use the existing corridor? Two examples of nice engineering in difficult terrain can be seen in the Santiam Pass (Oregon) and on the west side of the Sierras along highway 70 leading into Quincy, California. Surely such a large group, composed of a large corporation and hundreds of thousands of customers, can afford to be wise and not selfish. GP. 109-2

There are many unanswered questions, the greatest of which is why a beautiful, undisturbed landscape is not being left alone for future use, perhaps for a time when today's technology will be considered cumbersome and a poor investment. It seems short-sighted to consider immediate economic gain the most important motivation for decision making. People have a responsibility to each other and an obligation to young people to make decisions for the long term, not just the economic short term. GP. 109-3

In addition to these larger issues, there is the question of whose neighborhood will bear the burden of this project. Wherever it is placed, the people, wildlife, and vegetation in its vicinity will experience unfortunate changes. For example, where I live, most of us consider the visual beauty of the hills and the pleasure of outdoor recreation to be our greatest assets. Power lines of this size would dominate our view, and beneath structures and lines of this magnitude the peacefulness of our setting would be lost. There is significant concern among residents about EMF. Some experts still disagree about the effects of EMF, and there are still unanswered questions. Putting power lines of this size near people's homes at this point in time imposes an economic penalty, a threat to our lifestyles, and possibly a health risk. Why should those who happen to be in the path that is chosen bear these burdens? One community should not be sacrificed in favor of another. Standards of fairness should be applied to all neighborhoods whether they be affluent or poor, dense or sparse. GP. 109-4

Let living near a 345 kV line be the voluntary individual choice of informed citizens rather than an imposed situation on existing neighborhoods.

In addition to these concerns about standards of fairness, I feel dismayed that forest land would be crossed. This sets an unfortunate precedent for future use of public land. National forest land is to be protected and held as an unspoiled area for people,animals, and plants, not for technological needs. GP. 109-4

It seems clear that the amount of feeling that this line stirs up is directly related to its size. Citizens have not found smaller power lines threatening or ugly. We find it a cheerful sight to see a flock of birds on a small power line. But this power line electrocutes birds. Birds, airplanes, people, plants, wildlife--all must make way for this thing because of its great size.

Why isn't the line being broken down into smaller parts sooner and sent on smaller poles with smaller wires to the places it will be needed? Reno Sparks needs only part of the power that is being brought into town--much of it will go to other places from here such as northeastern California. We could live with smaller power lines and smaller voltages. As more neighborhoods feel the impact of the massive scale of this project, there will be more emotional discussions and serious concern. All this unhappiness could be short circuited by bringing smaller amounts of power to the places it is needed rather than such a massive amount of power to a central location. Why should wildlife, neighborhoods and people's peace of mind all be sacrificed in favor of something so big and ugly? And would there not be a security advantage in having more numerous smaller lines and poles rather than being dependent on one huge line? GP. 109-5

What is being done to preserve the economic viability of the geothermal plants which make Nevada less dependent on sources of power which are far away?

Why are staging areas being placed in town which is densely populated and in Bordertown where people' rural lifestyle will be disrupted? (Map on page E7 of the DEIR/S, Exec. Summ.) Why aren't more alternative sites proposed for power stations and more alternative routes into and out of this area. GP. 109-6

As a resident of Horizon Hills, I would like to know the answers to a few specific questions:

Where is the fault near Horizon Hills? Has it been or does it need to be considered in placing the line? This potential for earthquake makes recreation anywhere near the line even less inviting. What number on the Richter scale might snap a line or move a pole? What is the rate of lateral transmission after such an accident? Would burying the lines pose less risk in case of accident or earthquake? What disadvantages would there be to people living near the line if it were buried instead of above ground. GP. 109-7

There will be a high fire risk again when sage and grasses mature. What threat or impediments to fire fighting does the presence of these large structures offer? GP. 109-8

Once this new utility corridor is opened, what other projects may follow? Can the size or number of lines be increased? What limitations are there? The Tuscarora gas pipeline is mentioned in the Executive Summary as paralleling the power line in some places. If this corridor is opened, is it more likely that the gas line will also be going through in the same area, and is it likely to be put through the hills above Horizon Hills? GP. 109-9

Will new access roads or grading occur (page ES-32)? Will there be areas bladed for overland travel? These scars could be seen from miles away as are existing roads. New roads or blading would increase traffic and noise in our quiet neighborhood by providing more trails for sports utility vehicles and dirt bikes. GP. 109-10

On page ES-37 significant impacts on property values is recognized as a problem. Who determines the level of economic devaluation of property and whether there will be neutral arbitration for compensation of property owners? GP. 109-11

Did the people who chose the route know that Horizon Hills has rain when town is dry and that there is wet, sticky snow or ice when town has rain? Wires will be wet often from November to June increasing the possibility of corona discharge. Did they know that we are in a high wind area and that disturbed land surfaces are picked up by the wind? Did they know that dozens of meadowlarks return each year to raise new families, and that other songbirds migrate through this area? Did they know that this is navigable air space for rescue helicopters from Reno and fire fighting airplanes from Stead? It is mentioned in the Executive Summary that larger birds are electrocuted by the wires. Is it possible that our resident population of magpies and hawks and our golden eagle family will be decimated? GP. 109-12 GP. 109-13

I appreciate the service Sierra Pacific provides and its prudence in planning for the future. But there are other ways of routing to end users and downsizing lines that would not impact so many people, so much pristine landscape and so much wildlife which needs its habitat to get along. I sincerely hope Sierra Pacific will consider the alternatives. GP. 109-14

A specific alternative I have heard about is that an existing 1000 kV line that passes through the Black Rock Desert down to Wadsworth be utilized to handle additional carrying capacity from which it could be downsized to run into Reno along existing lines, and the major power could be diverted further north to meet the needs of the mining industry. I'm sure the connecting line necessary through Cedarville would be well within the capacity of modern engineering. Surely this sort of plan would be for the good of all. GP. 109-15

Thank you for your consideration of my concerns.

Mary Toleno
2445 Mandan Way
Reno, NV 89506
702-677-0257

Mary Toleno
June 1, 1995

RECEIVED
JUN 05 1995

General Public
Comment Set 110

Dear Sir

I am writing this letter to you so that I can state my complete and full opposition to the proposed Altura Power line that Sierra Pacific Power is attempting to build. This line will pass along my property line, although not on my property per se, and as such I feel that I have to respond.

I should start with some historical facts so that some substance to my remarks might occur. My late husband John and I purchased our property in 1949 from Mr. Anderson. It is still known today as Anderson Acres. We own 2 parcels of land one along the railroad tracks at the end of Moore where our home is situated and the other along Old 395 which has 11 duplexes and 6 homes plus my daughters home. We have maintained the rental units since 1949. It is a full time job balancing me. We also supply the water for these rental units through our water pipes supplied by our own developed springs by our own water company. We began supplying water in 1952. This water system provides extremely fine and pure tested water as it is gravel-filtered snowmelt from Peavine.

I'm proud of what John and I have accomplished here and it is a fear of what will happen to my things that this proposed line will change that worries me so.

First let me say I know that progress is natural - when we moved here there was no Hermon Valley - no Cold Springs - no Red Rock - no Horsegan Hills etc. Steel was an Air Force Base. Now it's really changed but one thing has pretty much remained the same and that is Peavine Mtn. I'm 89 years old and I simply cannot put into specific words the joy and beauty and wonder that I have found and experienced in my life in the time that I have lived there almost 50 years at the base of this mountain that has such great clouds and winds. I really feel that by living here rather than in the city or farm that I might not enjoy life as much as I do. So my first objection would be based the quality of life and the destruction of the magnificent views that would be spoiled by these large towers between my home at the base of the mountain and the mountain itself. GP. 110-1

Secondly I'm worried about the electric magnetic radiation that the line would create. I'm an old woman and since John died I've used an electric blanket at night. Sierra Pacific sent a notice in my power bill that I should not GP. 110-2

stand close to a microwave nor sleep to long under an electric blanket. I've been trying to figure out what i'm supposed to do and now i will have something much more powerful than my blanket near my house. If something that uses 110 volts is not good for me to be near then what harm will come from 345,000 kv.? No where does anyone seem to have a real sure answer - depends on which side you're on it seems.

GP. 110-2

Thirdly i wonder why we would/why need this power coming this particular way. Not only would it cause many problems in California i.e. crossing the raptor refuge - isn't this an area set aside for protection? and i know i've seen many birds over the years hurt by power lines - the destruction of the great open spaces from Altura to Reno down long Valley. (my son lives in Danville so i travel this road a lot) and i'm sure damage to the areas passed by these lines. This power line opening a new "road" if you will would only seem to allow more development of other power transmission along it. i.e. a gas pipeline is in the works i understand.

GP. 110-3

What bothers me is not only do i face the probability of more than one power line by me but that it seems to me funny that the power should come into north Reno while we have Truckee and soon Pinon Pine power plants on the east side of Reno. Is the power from these plants than going to be sent east to the many and growing number of mining operations in north central and eastern Nevada? I don't know of any power plants being built on the east side of the state after the big one at Wells was cancelled. If the mines need power wouldn't it be better to expand Valley and use existing line corridors? It also seems to me that this Alternate Route was chosen because there isn't that many people to object to the route unlike for example if it went through Sparks or Reno.

GP. 110-4

My final objection concerns our water supply - nowhere do i see mention of the possible problem in the environmental impact statement. Our water company owned system (ST Water Co.) has been certified and tested by the State of Nevada since 1952. We are classified as a "spring fed" water system which by definition mean 40 feet or less. It is our strong worry that the installation of the power line will disrupt - by the structural building needed for footings - by the continuous access road needed to construct the line the flow of water to our collector springs which form the basis for our water supply to our tenants.

GP. 110-5

If our water supply is damaged in any way it would affect our ability to supply water to our tenants on a reliable basis and hence would affect our livelihood. I was told by a Sierra Pacific person at one of the meetings that the footings would only be 10 feet deep - that's 25% of the depth of our water system - and that he thought that this shallow depth would not bother the springs. my question is this - if they are only 10 feet deep how long and wide are they so that they can support 130 foot towers? no one would answer me. if they are long and wide the compaction will be damaging to our springs, the access road for the power lines would also seem to be a problem not only for the compaction of a "band" across the base of Pearce but the increased off road travel that results when motorcycles and 4 wheel drive vehicles begin to use this road to further access Pearce and also our private property.

GP. 110-5

GP. 110-6

As I see it there are many problems with this project and i would like to again state my full opposition to it's completion.

Thank you for hearing me out and - hope i have not bored you.

Respectfully yours

Alice N Trail

RECEIVED
JUN 05 1995

CPUC # 93-11-018 BLM # CACA-31406
MS. JULIE HALLIGAN - CALIFORNIA PUBLIC UTILITIES COMMISSION
MR. PETER HUMM - BUREAU OF LAND MANAGEMENT
C/O ASPEN ENVIRONMENTAL GROUP
30423 CANWOOD ST. #218
AGOURA HILLS, CA 91301

General Public Comment Set 111

DEAR MS. HALLIGAN AND MR. HUMM

I AM WRITING TO EXPRESS TO YOU MY PROTEST OF THE PROPOSED ROUTING OF THE ALTURAS POWERLINE. PEAVINE MOUNTAIN IS ESSENTIALLY MY FRONT YARD IN THE HORIZON HILLS COMMUNITY. THE NATURAL BEAUTY OF THIS AREA WAS ONE OF THE MAIN REASONS I PURCHASED A HOME IN THIS AREA. THE CONSTRUCTION OF THE ALTURAS POWERLINE ON PEAVINE MOUNTAIN WILL DESTROY THIS NATURAL BEAUTY FOREVER. (GP. 111-1)

MANY RESIDENTS OF THIS COMMUNITY AND THE SURROUNDING COMMUNITIES HAVE FOR MANY YEARS ENJOYED THE RECREATIONAL VALUE OF THE PEAVINE MOUNTAIN AREA. I KNOW THAT THE PROPOSED POWERLINE WILL THREATEN, IF NOT DESTROY, THAT PRIVILEGE.

I AM A NEW RESIDENT TO THIS AREA, BUT I HAVE ALREADY BECOME ATTACHED TO MY NEW HOME, GREATLY BECAUSE OF THE ISOLATION FROM CITY LIFE. THAT ISOLATION WILL BE IRREVERSIBLY DAMAGED WITH THE CONSTRUCTION OF THE ALTURAS POWERLINE.

I WOULD ASK, AS A RESIDENT OF THIS COMMUNITY, THAT YOU FIND A BETTER ROUTE FOR THIS POWER LINE. I KNOW THAT THERE ARE ALTERNATIVE ROUTES THAT WOULD NOT DESTROY THE LIFESTYLES OF SO MANY FAMILIES. THANK YOU FOR YOUR CONCERN IN THIS MATTER AND PLEASE CONSIDER THE SEVERE IMPACT THIS PROJECT WILL HAVE ON THE HOMES OF MANY HARDWORKING PEOPLE. (GP. 111-1)

SINCERELY,
CONCERNED RESIDENT
TERRY CLICK
Terry Click

JUN 05 1995

General Public Comment Set 112

John Lundemo
11050 Duffney Lane
Reno, Nevada 89506

Julie Halligan/Peter Humm
CPUC/BLM
% Aspen Environmental Group
30423 Canwood Street, suite 218
Agoura Hills, Ca. 91301
ReCPUC App. No. 93-11-018 and BLM Case No. CACA 31406

Dear Ms. Halligan and Mr. Humm:

I am opposed to the proposed Sierra Pacific Power Company's plan for the power line from Reno to alturas. Reference CPUC App. No. 93-11-018 and BLM Case No. CACA 31406 for many reasons.

I haved lived in Anderson Acres, Nevada, at the railroad tracks level of Peavine Mountain, since 1971, and have been on this mountain since 1971. I am raising my children here. As past president ogf the Anderson Acres Homeowner's Association, as a former voluteer firefighter, as a high school teacher for the past 16 years, and as a resident of Nevada since 1963, I have never felt so strongly, and in this case, opposed, to an environmental, economical, and cultural issue as I am in this SPPC proposal.

I don't believe the alternate route, which will destroy the mountain and meadows, is the answer to this powerline proposal. Currently, this is one of the most beautiful and pristine, unspoiled areas in this part of the state, in this part of the world. Often, raccoons, deer, coyotes, owls, rabbits and other animals come right down into my yard. The meadows are wetlands and should never be destroyed. The canyons are full of flora and fauna and are traditional Native American sacred places. The Basque sheepherders have treasured this mountain for generations.

I believe this is a historic district because of Poeville, which is one of the earliest settlements in this area and which really predates what is known as Reno. Certainly the history of Peavine is as important as Lake's Crossing or Virginia City if seen in proper perspective. In addition, there is something to be said for a view and place in our culture and society for areas near metropolitan cities where all people can still have easy access to nature and wildlife without having to drive so far and Peavine Mountain -- much more so than even Mt. Rose-- provides opportunities for a variety of recreational and educational experiences that do not require driving, parking and money such as the Lake Tahoe and Mt. rose areas for skiing, etc.

Please do not approve this permit. This part of the mountain is really the "jewel" of the North Valleys. We are "outside of Reno, " but the changes and effects this proposal will bring about are more significant than relocating people, or houses to make new "corridors" in natural and unspoiled settings, when old routes and existing power corridors have already done their damage and destruction. Indeed, I feel there isn't any reason to sacrifice areas like portions of Rancho San Rafael, Peavine mountain, and Long Valley to bring this monster of 345, 000 watts through our mountain. Valmy cAn handle northern Nevada and I feel SPPC cannot justify this project other than to present it as a venture that is for capital and profit, for celectricity to 'sell' on the markt. And I don't think we should trade the wildlife and unspoiled places for this type of reasoning. The damage and harm that will be done when the bulldozers and cement trucks and men erecting steel come to the meadows and mountain will destroy the creeks and nature forever. The huge towers will destroy what is now a "real view." One that is not marked and scarred and criss-crossed with wires, lines, and signs of man's "progress."

GP. 112-1

Please, you must consider what I am saying since I will live more closely to the line and poles than anyone along this planned part of the route. Please call me to testify and I can give you the true feelings of the people here who have lived here for years and many of us who are now raising our children here. My cabin was built in the 1940's and is one of the oldest places in the place known as "Peavine Springs" in maps and books dating back to the 1850's.

Please, the "little" people, the real honest and hard-working citizens who live and work here, do not want this

line to be placed above the tracks on this side of Peavine and we really need you to protect and help us. We have been there for the fires, and the many other reasons utility companies have asked us to compromise, but in this proposal we all are strongly united and oppose this project.

Our hearts are heavy with this power line proposal and if the people in ASmerica need anything in these challenging and turbulant times of stress and worry, it's some comfort and solace to know that the CPUC and BLM can help protect a little space for people to rest and enjoy the wonders of our world and that there are people in places of power and decision-making who can still sense and feel why we feel this will be a great loss to all of us and to America and the generations to come.

GP. 112-1

Thanks, and feel free to contact me for anything.

Sincerely,

John Lundemo, (46 YEARS-OLD)
Phone: 702-972-6369

General Public
Comment Set 113

RECEIVED
JUN 05 1995

395 Dunlawe Dr.
Reno, NV 89512
June 2, 1995

Julie Hallagan / Patten Humm
CPUC / BLM
c/o Aspen Environmental Group
30423 Canwood St. Suite 218
Agoura Hills, CA 91301
CPUC application # 93-11-018
BLM case # CACA 31406

Dear Sirs:

I consider the Alturas Transmission Line Project to be a potential blight on the landscape, not to mention a possible health hazard to man and beast who happen to be fortunate enough to be in the physical or visual vicinity of this terrible project. GP 113-1

One way or another, bury it!

With hope or dread,
Mary R. Herman

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JUN 05 1995

General Public Comment Set 114

5-1-95

We oppose the construction of the Alturas-Reno power line. We have lived at the base of Peavine Mountain, North of Reno, for many years. We live here because of the beautiful mountain view and the peaceful, quiet environment.

We believe that this power line will NOT provide cheaper power rates as consumers will have to pay for the construction of the line, and no one would plan a project of this magnitude without a huge profit involved. (For example, using this line to extend power to Truckee and other California sites, and to North-Central Nevada, where several large gold mines are in operation.) There is a power line corridor already in existence on the east side of Reno. Once a power corridor is widened on this side, what will stop gas lines, oil lines, etc., from being built alongside?

GP. 114-1

All the land this project would devour, the eagles and other birds the lines would kill, the destruction of the aesthetic value of this land, the reduction of our property value, and the health risks to those living close to the towers, are all reasons why we oppose this project.

This line would severely damage our property values and prevent the developement of our land we have been investing in since 1952. Our water collection system would be severely damaged and would ultimately be your responsibility if this should occur. We realize there would be no TV or radio reception in this area which would severely affect our ability to rent our units on the slope of Peavine.

GP. 114-1

Hope you visited this area lately.

Sierra Power is not noted to have this area interest at heart. Please use the existing corridor east of Reno.

Sincerely Elaine Pinko
Investor in this area

Dear Sir -

It is painful to realize that the citizens on the slope of Peaceful Long Valley, Border town is regarded in your words as "non-significant."

As for the statement that it would only disturb sage brush - you did not investigate the underground water that supplies the rentals and private homes.

GP 114-2

There would be "significant" damage to income property and private homes if the water supply is polluted or diverted from the original waterways.

Please stick the original route East of Reno

Sincerely

Elsie Pinko

Steve T Pinko

Jenny Booth
8140 Seneca Drive
Horizon Hills
Reno, Nevada 89506

RECEIVED
JUN 05 1995

General Public Comment Set 115

May 31, 1995

Ms. Julie Halligan
California Public Utilities Commission
c/o Aspen Enviromental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

RE: PROTEST OF THE PROPOSED ALTURAS 345KV POWERLINE
CPUC Application Number 93-11-018 & BLM Case Number CACA-31406

Dear Ms. Halligan:

I'm writing this letter as a formal protest to the Alturas powerline, that is proposed to be put in across Peavine Mt.--in my backyard. While you are no doubt flooded with such letters, I ask that you take time to read them all as sincerely as they were composed.

Our house is on Seneca Drive with BLM and Peavine Mt. on the other side of our back fence. We bought here in September of 1994, after a 2 year search. We felt like we bought a small piece of paradise and a large chunk of peace of mind. Neither of us being "town people," we found this to be a wonderful compromise--close to town, yet quite removed, with a fantastic recreational area at our fingertips that we use and respect greatly. Since buying, we have been happily putting money into the house, including a major and expensive remodel. Pride of ownership, increasing property value, creating our dream as a young couple with their first house. At no point were we ever notified about this proposal from Sierra Pacific. This is very dismaying, especially when there is the once a month contact made from them in the form of the power bill, which we happily pay promptly. My point on this is how clearly this was meant to be kept under wraps till it got to a point where it was so far along that opposition had to scramble to rally against it. We found out 1-1/2 months ago while chatting with a friend at a local 7-11. We were shocked to say the least. Notifications of public meetings have also been absent, and the ones I've managed to attend, I've been notified by a fellow neighbor knocking on the door and telling me there was a meeting in 45 minutes--could I make it? My point here is that there has been an unfair advantage so that A.) most people didn't know about these opportunities to formerly protest, and B.) that because of short notice and the inconvenient daytime scheduling, most of the working class couldn't attend. GP. 115-1

That this project is even considered is disappointing and shamefull Mt. Peavine is the last resort for many, many people of Reno--land that is used respectfully. We constantly see mountain bikers, picnickers, hikers, dog walkers and campers in these hills. After the fire a few years ago, my neighbors bought and scattered wildflower and grass seeds to help the scarred land. We pick up trash. My point here is that people take their own initiative and money to keep this mountain as a mountain should be. Also that there is an integrity level here of people who live in town from whatever reasons--jobs, schools...but find their haven and peace of mind

with the close access of a public recreational area. Most people don't realize that approximately 2/3 of Peavine is privately owned, leaving 1/3 for public use for years to come--and the proposal of these powerlines should never have been entertained. I realize that time and progress march on, but there are several options available including existing lines across the Black Rock Desert to Wadsworth and the existing corridor east of Long Valley and Peterson Mountain.

Also, many people don't realize this is intended to be a "power corridor" which will soon accommodate gas and fiber optic lines. In these progressing years of shrinking land, we must hold onto what we can as unspoiled recreational areas for now and the future, and make a stand that for one spot on this earth, integrity will be held above someone making money!

Another very important point...does anyone truly understand the health risk of such a tremendous powerline?! Is this a situation where 20 years down the line "we'll know better"! The example of black lung and coal mining is clear...no on thought all those years ago of the fatalities that would follow. Does anyone really know with solid evidence to back it up about this risk of the powerline? Or, is this considered a statistical thing, where few would suffer because of the benefit of many. No one has the right to decide that--a community of 100 should never be balanced on the town of 100,000! GP. 115-1

And finally, tell me who would compensate all of us financially with plunging market values? For the people who have lived here for years and have been steadily whittling away their mortgages and plunging money into home improvements? Or like us, who just purchased our very first home last September, who now feel like blind-sided victims. Please ask yourself--would you want to live with the threat of powerlines as such over your house? Would you want to buy a little retreat from the helter skelter of overwhelming construction in town, only to have your view raped by 110 foot towers carrying 345 KV of power that is not necessary? Help us take a stand--for everyone who lives here and finds their escape in Peavine, and for the future generations to come, that we finally said "NO" to something that clearly has other options.

Thank you for your time in reading this letter and I hope you can see the importance of this because this is a situation that, if escalated, can never, never be taken back, and we all stand for too much to lose.

Very Sincerely,

Jenny Booth

Jenny Booth
8140 Seneca Drive
Reno, Nevada 89506
677-2411

Andrew G. McMillan
8140 Seneca Drive
Reno, Nevada 89506

May 26th, 1995

JUL 05 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

General Public Comment Set 116

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA 31406

Ms. Halligan and Mr. Humm,

This letter is referring to the Draft Environmental Impact Report recently published concerning the above described transmission line. On page C.6-39 of the report it states that "primary access for construction crews should be via public roadways and existing access roads". At present, Segment A of the line contains very few access roads. Substantial access roads would have to be created in an area where rehabilitation is thought to be poor. This makes no sense when this area can be avoided. GP. 116-1

Sincerely,

Mary E. Wion

Mary E. Wion
711 E. 8th St.
Alturas, CA. 96101

8465 Mohawk Lane
Reno, NV 89506
June 1, 1995

RECEIVED
JUN 05 1995

Ms. Julie Halligan-California Public Utilities Commission
Mr. Peter Humm- Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood Street Suite 218
Agoura Hills, CA 91301

General Public Comment Set 117

RE: Formal Protest of the Alturas 345KV Powerline
CPUC Application # 93-11-018 and BLM Case # CACA-31406

Dear Ms. Halligan and Mr. Humm:

We are writing in protest against the proposed routing of the Alturas 345KV powerline through our community of Horizon Hills. We have been residents of Horizon Hills for 2 years, coming from California in March 1993 due to a job relocation. The move was very difficult for our entire family, but the one positive aspect was finding a home in this wonderful, secluded country setting of Horizon Hills. We did not want to have to buy another "tract home" as in California, and this home and ½ acre lot in Horizon Hills provided our 3 sons with a wonderful place to play, as well as hundreds of acres of fields and hills for their favorite activity, exploring.

Now, with the proposed routing of the Alturas Transmission Line Project in our community, the things we have enjoyed the most are threatened.

The peace and tranquility we have enjoyed since moving here will be destroyed.

The beautiful view we have of Peavine Mountain and surrounding foothills will be destroyed. (We have no houses across the street from us, so we now enjoy a vast view of the many fields, hills and of course, Peavine Mountain.)

Our property values will be adversely effected by the intrusion of a major powerline. GP. 117-1

The noise level caused by the powerline will effect all residents. Our home is at approximately 5,200 feet, which is 800 feet above Reno's elevation, so we rarely have a day without wind, many of which are a very high wind. And we often get rain up here when Reno has received none. Both wind and rain will cause the noise level of the powerline to increase. GP. 117-2

Our radio and television reception will be effected. Our radio reception is currently poor, interference from a high-voltage powerline will only worsen the reception or cause the loss of some stations altogether.

As parents, our biggest concern is for our children's health. We feel the health hazards from electromagnetic fields surrounding high-voltage transmission lines are significant and we do not want to risk our children's health.

An article on EMFs in the May 1994 issue of Consumer Reports states " Of the 11 childhood-cancer studies that have been conducted, six are considered by experts to be the most careful and thorough. Of those six, five found some statistical association between elevated magnetic fields and childhood cancer." GP. 117-3

The article also states that"the occupational and residential studies done to date suggest that exposure to stronger-than-average magnetic fields may slightly increase the risk of developing some types of leukemia." And according to the article " At this point, enough evidence suggests a possible health hazard to justify taking simple steps to reduce your exposure to electromagnetic fields." GP. 117-3

We realize that the transmission line would not be in close proximity to our home, however, scientists don't yet know exactly what strength of magnetic field is associated with health effects. And as stated earlier, our children spend countless hours exploring the areas in and around the proposed route, as well as our weekend family outings to Peavine Mountain and the surrounding foothills.

The freedom our children enjoy while exploring and the freedom our family enjoys while on outings of picnicing, sight seeing, hiking and exploring new areas will be destroyed simply because we will not want to take the risk of being any closer to the high-voltage transmission lines than is absolutely necessary. GP. 117-4

Not to mention how the huge transmission lines will effect the beauty of the entire area. Not only for our family and the other residents of Horizon Hills, but also for the hundreds of other people in the Reno area who also enjoy the area for recreational activities.

We know you may feel that this routing is the best way possible to effect the least amount of people. However, it will effect many more than just Horizon Hills residents. The impact to the entire Horizon Hills community and the outlying areas would be so tremendous we must implore you to choose an alternate route.

Thank you for your time.

Sincerely,
Edward A. Campbell
Katherine M. Campbell

Edward A. and Katherine M. Campbell

General Public
Comment Set 118

Julie Halligan and Peter Humm:

Regarding the Alturas Transmission Line Project, we DO NOT WANT IT. I am sure you both have heard all the reasons why people do not want it and I have no new ones. Health tops the list, my house will be worth no where near what I had to pay for it. The animals will hate it and I speak for all of them, the wild ones and the house pets. GP 118-1

Mike and Mindy Bel
2250 Seneca Dr.
Reno, Nevada
89506
Horizon Hill
Homeowners

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JUN 05 1995

General Public Comment Set 119

5/31/95
8200 MOHAWK LN
RENO, NV. 89506

Ms. Julie Halligan
Ca. Pub. Utilit. Comm.
Mr. Peter Humm
B.L.M.

C/o Aspen Environmental Group
30423 Canwood St. # 218
Agoura Hills, Ca. 91301

RE. Protest of Alturas 345KV Line
CPUC App # 93-11-018
BLM Case # CACA-31406

Dear Sirs & Madams:

I am adamantly opposed to your proposed routing of a high powered transmission line across the foothills of Peavine mountain.

GP. 119-1 Alternatives to this plan are available and must be considered.

GP. 119-1 Aside from the previously expressed concerns, e.g. property damage, property value damage, health risk, noise, safety concerns, encroachment, lack of guaranteed maintenance; it would be wise of the company, in whose interest I am concerned, to consider that the North Virginia/Peavine area has been, in my experience as a long term resident of the area, one of the most difficult to

maintain in times of inclement weather. The SPPCo's inability to maintain consistant local service in this area should be an indicator of the "non" suitability of a feeder line through these foothills. Loss of local service for a period of a week in this area in 1985-1986 was inconvenient. Loss of your 345 KV power supply to Reno-Sparks due to "conditions beyond our control" will put a major percentage of power users in a very bad mood.

GP. 119-1

Please weigh this argument with all others presented. It is in the best interest of both power users and power suppliers to consider another alternative.

I respectfully submit,

Robert E. Tucker

Robert E. Tucker

P.S.:

As a child I used to try to climb high power poles. As the father of three young boys I wonder if there is any alternative to this temptation, and I think there is.

Please ... and thank you.

GP. 119-2

May 29, 1995

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General Public Comment Set 120

California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

CPUC Application No. 93-11-018

ATTN: Julie Halligan

This letter is in opposition to Sierra Pacific Power Company's (SPPCo) proposal to construct a substation and transmission line between Alturas, CA and Reno, NV. I'm sure you're aware of the environmental impact this destruction would have to the land and her wildlife along the route. You've seen the beauty of the land in both California and Nevada and have seen the animals that rely on the area for their survival. Obviously the substation and transmission line would obstruct this beauty and disturb the animals (Horses do not like to walk under them.) SPPCo assures us the metal 'H' shaped poles will be painted an acceptable brown which will blend with the landscape. If you have been in Nevada, you've noticed our "dirt" tan and "sagebrush" green landscape. I assure you we will notice the 80 ft plus brown poles. Aside from my own selfish reasons of wanting to continue viewing the beautiful land and wildlife, this letter is primarily for the continuing existence of this pristine earth and the creatures that live with her.

Besides the obvious visibility concern, the not-so-obvious health factors are a concern.

a.) The electromagnetic low frequencies emitted from the power lines and substation have been documented to cause subtle disturbances in humans which may lead on to greater disturbances: Hallucinations, memory loss, sleep deprivation, "cloudy mind", and to a greater extent, suicides, birth defects and cancer:

Becker, Robert O. *Cross Currents*, "Extremely Low Frequency (ELF) Radiation From Electrical-Power Lines", (1990), Ch. 8, p200-217.
New York Power Line Project Study, 1978, NYS Public Service Commission
World Health Organization, Geneva, 1987, "Magnetic Fields"

GP. 120-1

These are only a few of about 50 references I have in my possession. Although SPPCo will tell you there is no conclusive proof of these disturbances, the documentations is extensive. More people are becoming aware of their environment and note these affects when living near power lines.

b.) There is a potential fire hazard. An ex-employee of SPPCo witnessed power lines slapping together causing a tremendous arching and "fireworks" display. Wind has been clocked around 100 mph in this location. This housing community will be in jeopardy from a fire hazard.

c.) A humming drone will occur as admitted by SPPCo. They assure us "it won't be any louder than the sound of traffic." I moved here 2 years ago because there is no traffic noise and I could sleep better. We will be giving up our peaceful nights for a "traffic noise" drone, and lack of sleep.

GP. 120-2

I'm most disturbed by the alternatives that are available that would satisfy SPPCo and make the residents happy but which are being ignored by SPPCo with convenient excuses.

a.) SPPCo insists they will be able to better serve the consumers of the Reno/Sparks area, especially during times of power outages as they would now have a backup. They have not needed this "backup" before. Down time has been minimal in the 20 years I've been in Reno. Anyhow instead of the 345 K line, 120 K lines can be used in existing corridors and maybe buried. This would provide the same service but safer. Once again SPPCo insists that running 2 parallel lines could be hazardous incase they both fail during a natural disaster. However this has been done at locations along Interstate 80 west (from Reno) over the summit, east along their Tracy substation and south near Carson City. Apparently natural disasters were not a concern then.

GP. 120-3

b.) Put the 345 k line underground. The cost would be tremendous at first, but there would be a very low maintenance cost in the long run. This line would be better shielded as it has to be if underground and be better protected from the elements that above ground lines are exposed to. This is becoming a practice in major cities due to their overuse of above ground corridors.

GP. 120-4

c.) Don't do it at all. SPPCo admits by saying this line will be a "backup" in case of disasters that they currently have the power to serve this area even with a growing population.

GP. 120-5

SPPCo is not concerned with serving this area in cases of emergencies or otherwise but instead admits they will be serving the mines in Northeast Nevada and will buy and sell power wholesale to neighboring states. Their objective, as it has always been in the 20 years I've been a consumer, is to make a profit not for me, but for their shareholders. Why must people, the land, the animals be sacrificed to support the greed of an overbearing monopoly that has resources to do anything it wants in California, Nevada, and elsewhere??

GP. 120-6

As with the above ground testing of nukes, must we wait 40 years before the government bureaucracies acknowledge the harmful affects caused by powerline radiation?

GP. 120-7

Please consider all the concerns you receive and help stop SPPCo from continuing the unwarranted destruction. You will see a bumper sticker in Nevada:

Welcome to Nevada! Operated and Owned by Sierra Pacific Power Company

Thank you!

Sincerely,

Brenda Cristani

Brenda Cristani
2440 Mandan Way
Reno, Nevada 89506

Located in Horizon Hills near Stead at the base of Peavine Mountain

xc: Governor Bob Miller, Nevada
Senator Bill Raggio, Nevada
Senator Richard Bryan, Nevada
Senator Harry Reid, Nevada
Congress Woman Barbara Vucanovich, Nevada
Bill Van Burgenn, U. S. Forest Service
Chairman John Mendoza, Nevada Public Service Commission

Roger Olack, Mike Reid, Steve Younkin, SPPCo
Assembly Woman Joan Lambert

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JUN 05 1995

General Public Comment Set 121

June 2, 1995

Ms. Julie Halligan - California Public Utilities Commission
Mr. Peter Humm - Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

RE: PERSONAL PROTEST OF THE ALTURAS 345KV POWERLINE
CPUC Application Number 93-11-018 and BLM Case Number CACA-31406

Dear Ms. Halligan and Mr. Humm:

I am writing today as an 8 year resident of Horizon Hills, a small community on the northeast flank of Peavine mountain, and in the direct line of the proposed power line. I am issuing my formal protest against the planned routing of the Alturas 345KV powerline as I feel that the area will be significantly impacted by this routing decision. I am most concerned about the visual and aesthetic degradation of an area which is currently a pristine wildland mountain.

The powerline will come within 2500 to 3000ft. of our community and right across an area which is currently used as a major recreation site. There are two stock ponds which the powerline will pass between. Many people from the Reno area also come through Horizon Hills to recreate on this side of the mountain.

As other residents in the District, I too, purchased property in the Horizon Hills General Improvement District because of the rural and aesthetic aspects of the location, knowing full well that we were bordered to the south and west by Forest Service land. The proposed powerline, I fear, will substantially impact the resale value of my home as the aesthetic and recreational aspects of living next to Peavine Mountain and being bordered by Forest Service Land will be forever altered and degraded. GP. 121-1

I am concern about the invasiveness of a project of this magnitude into a small community and onto the flanks of a pristine mountain wildland. My personal peace and quiet, peace of mind and Spiritual connectedness to this mountain environment will be forever compromised. I am sickened by the thought of looking out and seeing 90 to 120 ft. towers scaring the landscape.

I am concerned also about the future integrity of the mountain and regarding future land use plans should this powerline go through. What at the chances that Sierra Pacific will add additional lines once this corridor goes through and what are the chances that the Forest Service will allow additions to an already impacted landscape? When does it stop?

1

Reroute along existing lines; do not impact pristine scenic wildland!.

I understand that the majority of this power is for the mining interests in northern and northeastern Nevada. Also that the amount of power that Sierra Pacific will be bringing in is 3x that which they are currently using. I feel that this powerline is designed to serve the interests of Sierra Pacific's shareholders and the future prospects of being a supplier rather than a buyer of power. This is a political and economic decision that will greatly impact those of us along the proposed corridor. Based on the above points, it seems more logical to consider routing the powerline through northeastern Nevada to supply the mining end users. I seriously question the need to impact pristine wildland areas and rural ranching environments along the eastern Sierra Front from Susanville to Reno when there are existing lines with the carrying capacity which would route the power more directly to the main projected end users. Specifically, I would suggest that the 1000KV line which passes through the Black Rock Desert, along the Granite Range, down to Wadsworth, be utilized to handle additional carrying capacity. This alternative seems viable, would have little impact as it is a preexisting line, and would effect less people than the current plan as it would pass through a less populated area. GP. 121-2

I do hope that the aesthetic and recreational impact along a pristine area will be outweigh the benefits to Sierra Pacific and that rerouting along existing corridors will be considered in the final decision making process.

Respectfully Submitted,

Cari Lockett

Cari Lockett,
Resident, Horizon Hills

Cari Lockett
2496 Hopi Ct, Reno, NV 89506

2

Elvira Picotte
P.O. Box 756
Alturas, CA 96101

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General Public Comment Set 122

May 28, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC #93-11-018, BLM #CACA 31406.

Dear Ms. Halligan & Mr. Humm;

The change in character of the environment by the presnce of the transmission line structures was not discussed in the environmental impact report in relationship to the box canyon at the north end of Daggert Canyon. Daggert Canyon has significant visual value that is important to the residents of Modoc County. This is made clear in the Modoc Board of Supervisors resolution in regards to the north and east aspect of this canyon.

The BLM has a designated bike route in this area that would be visually impacted to a significant, non-mitigable degree. GP 122-1

On page C.8 of the environmental impact report, it states "The change in character of the environment would be significant at the Tule Patch Spring Rest Area, Infernal Caverns Battleground Memorial Monument, and Lassen Red Rocks Scenic Area." Daggert Canyon was not mentioned, but should be included. Number of visitors are greater there than at the Infernal Caverns, and the box canyon is a significant geological structure (as is the canyon just to the east). This area also has further recreational potential, due to it's proximity from Altuas.

Sincerely,

Elvira Picotte

Elvira Picotte

Elvira Picotte
P.O. Box 756
Alturas, CA 96101

RECEIVED JUN 05 1995

May 29, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC # 93-11-018
BLM #CACA 31406

Dear Ms. Halligan and Mr. Humm,

Please refer to page c.6-34 of the draft environmental impact report written for the proposed power line thru Modoc County. It states that active faults are considered a Class 2 impact, only because they can be avoided. Yet there is no effort to avoid the faults that have been identified. The Hilltop Substation would be built very near, and possibly on, a known fault. The only access road, Barnes Grade, is built on a fault and evidence of recent activity is obvious in the road cut. The line follows the Likely Fault, but little is done to suggest avoidance. GP 122-2

Fault lines should have been an initial concern during evaluations in determining the routing of this project. Instead, it appears to be one of the last concerns, only to be mitigated with future studies. Active faults can be avoided and should be. Nothing is earthquake proof. Certainly, substations should not be considered even close to an active fault.

Respectfully,

Elvira Picotte

Elvira Picotte

RECEIVED
JUN 05 1995

General Public Comment Set 123

JUNE 1, 1995

TO: JULIE HALLIGAN/PETER HUMM
CPUC/BLM
C/O ASPEN ENVIRONMENTAL
30423 CANWOOD ST., STE. 218
AGOURA HILLS, CA 91301

RE: ALTURAS INTERTIE, CPUC #93-11-018, BLM #CACA 31406.

MS. HALLIGAN AND MR. HUMM,

ON PAGE B-10 OF THE DRAFT ENVIRONMENTAL STATEMENT PREPARED BY ASPEN ENVIRONMENTAL IT STATES, "SPPCO USED THE ROUTE REFINEMENT PROCESS TO IDENTIFY THE MAPPED RESOURCES THAT COULD BE EASILY AVOIDED (WITH APPROPRIATE PROTECTIVE FLAGGING IN THE FIELD) AND THOSE THAT THEY WOULD COMMIT TO AVOIDING (THROUGH ESTABLISHMENT OF EXCLUSION ZONES OR THROUGH ROUTING OF CONSTRUCTION ACCESS)". YET THE IMPACT SUMMARY TABLES SHOWN ON PAGE ES-47 SAYS, "ALL SENSITIVE SITES (FOR SPECIAL STATUS SPECIES AND HABITATS) WILL BE LOCATED DURING PRE-CONSTRUCTION SURVEYS". HOW CAN THE CPUC/BLM COMMIT TO PERMITTING A PROJECT WHEN POTENTIALLY SIGNIFICANT, POTENTIALLY CLASS I BIOLOGICAL IMPACTS HAVE NOT BEEN FULLY IDENTIFIED AND SITE-SPECIFICALLY LOCATED? THIS IS A FATAL FLAW. GP. 123-1

SINCERELY,

Jeane Roberts
500 East A
Alturas, Ca
96101

RECEIVED
JUN 05 1995

General Public Comment Set 124

June 1, 1995

Dear Sirs—

This letter is in response to the proposed Alturus 345 KV Transmission Lines. I am very much opposed to the line because I am in the process of trying to sell my home & am concerned about potential buyers hearing about this proposed project & not wanting to buy out here because it would adversely affect many of the reasons for them to want to live out here. Therefore I just wanted to notify you of my opposition to this project. Thank you.

GP 124-1

Sincerely,

(Horizon Hills) Carolynn Kelley
8000 Blackfoot Way
Reno, NV 89506

General Public Comment Set 125

June 2, 1995
CPUC #93-11-018
BLM Case # CACA-31406

We are writing to express our dismay over the proposed Alturas Intertie, specifically that portion along 395 between the Fort Sage Mountains and Bordertown, in the area know as Long Valley. There are several points that we would like to make regarding the project.

First, the supervisors of Sierra County and the Planning Commissions of both Sierra and Modoc Counties have rejected the project as incompatable with the scenic and recreational values of the area. Do the wishes of these elected officials and of the local residents count in the ultimate decision?

Second, the end-users of the electricity supplied by the intertie are in northern Nevada. The benifits to the residents of this area are negligible, expecially when measured against the visual degradation of our surroundings and the decline of property values. Why then, should the power corridor be placed in our front yards, rather than a few miles away, in Nevada? GP 125-1

For that matter, it seems that all or part of the intertie could be placed underground. Sierra Pacific's protests that any alternatives to their proposed route are too costly are just laughable, considering what the returns from this project will be over the next few decades.

Long Valley, where we make our home, is a beautiful and unspoiled place. Quite frankly, we are sickened by the thought of what Sierra Pacific proposed to do to it. If allowed to go forward, the Intertie project would forever ruin a magnificent corner of the western landscape.

Thank you for taking the time to read this letter. We hope that you will take the above points in consideration in your final decision about the Alturas Intertie.

Sincerly

Rebecca Hayhurst
Chris Battis
PO 52
Chilcoot, CA 96105

JUN 05 1995

P.O. Box 721
Alturas, CA 96101

RECEIVED
JUN 05 1995

5/29/95

General Public Comment Set 126

Julie Halligan/Peter Humm
CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA 31406

To Whom It May Concern:

The visual component of the DEIR fails to address the valued uninhabited aspect of Modoc County. Why is visual value weighted on viewer numbers and available visual access? Memories of Modoc County are not formed by streaking down Highway 395 on the way to Reno (as indicated on page C.13-19 of the DEIR). They are formed when Modoc County is a trip's destination. People that visit Modoc County (or live here, for that matter) are typically looking for remoteness. Most camping is done primitively. This is evidenced by the lack of developed campgrounds in Modoc County. There are only a few developed campgrounds and these are very small and semi-primitive. Why doesn't the DEIR address Modoc County for what it is and for what the people want it to be?

More questions, why is the DEIR written to fit the Project? Why does the BLM/CPUC's DEIR assume visual concerns and ignore what the people of Modoc County have been telling you are their concerns? Remote areas, such as Daggert Canyon (only a few miles northwest of Alturas) are just as important (or possibly more important) than areas that are more frequently viewed. The relative lack of accessibility of Daggert CAnyon and the Infernal Caverns adds to the intensity of the viewing experience. Why are the impacts assumed to be less because areas are little known or relatively inaccessible? The DEIR makes assumptions that are not based on fact. The DEIR ASSUMES that VRM indicators can be applied to private land (page C.13-15). The DEIR ASSUMES that remote areas have no visual significance (page C.13-24, second paragragh of C.13.2.1.1, second paragraph page C.13-32). The DEIR ASSUMES that people don't get out of their cars in Modoc County to access views. The citizens of Modoc County treasure their expansive, remote views. They cherish their "out of the way" vistas. The severe visual impacts of skylining and placing structures on hill crests and prominent points has been a heavily expressed concern. These concerns are amplified by resolutions from the Modoc County Planning Commission, the Modoc County Board of Supervisors and most recently, the City of Alturas. Please review your scoping letters to date. Why does the DEIR ignore this public input? Why does the DEIR ignore the number one form of mitigation - avoidance? GP. 126-1

The FACT of the matter is, the DEIR did not study the people of Modoc County or their visual needs or expectations. Concerns expressed in scoping comments are being ignored and instead replaced by assumptions. The theme for Modoc County has always been "Where the West Still Lives", and our local fair carries the theme "The Last Frontier". The site of the proposed Hilltop substation is on "Devil's Garden". These terms (and others) imply that Modoc residents are proud of their remoteness!

Respectfully,

Mick & Cathy Baldwin

Mick and Cathy Baldwin

6/2/95

RECEIVED
JUN 05 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, California 91301

General Public Comment Set 127

To Whom It May Concern,

The proposed Alturas Powerline Project has more drawbacks than advantages. Therefore I am opposed to its construction.

Environmental disadvantages include: its extremely high-voltage which exceeds safety limits on domestic electrical system and endangers the users of electrical appliances; electrical field would have variable, though predictably certain detrimental effects upon animals and plants within its range; powerlines would create a major visual impairment along its corridor and through the communities and park area; electrical field would hasten deterioration of the proposed natural gas pipeline along its corridor and result in leakage; such powerful elecromagnetic fields have been known to increase incidents of childhood cancer. GP. 127-1

Sierra Pacific Power Company provides customers with a brochure of warnings about using various electrical appliances, and other health hazards from exposure. Who wants to wear a safety shield just to microwave a meal or use a hair dryer? People don't settle into houses or rent apartments with the intention of having to protect themselves from the simple appliances of daily use and convenience. If they want to test their ability to survive hazards and show their bravery, they can find other methods outside their homes and away from their families and other people.

The powerline is for projected growth, not existing needs. The unstable water resources don't warrant much more community expansion anyway, so why plan for nonexistent growth? GP. 127-2

If additional powerlines are to be built, they should utilize existing power corridor(s) rather than disrupt more scenery and ecology. We should plan our commnuity development with an eye to maintaining and restoring natural environmental assets and maintaining our health. GP. 127-3

Sincerely,

Steve Alastuey

Stephen Alastuey
Citizen Alert Board Member
1077 Riverside Drive, Apt. #13
Reno, NV 89503

RECEIVED
JUN 05 1995
BLM

General Public Comment Set 128

June
~~JULY~~ 1, 1995

RE: ALTURAS TO RENO 345 KV POWER TRANSMISSION LINE
CPUC APPLICATION NO. 93-11-018; BLM CASE NO. CACA-31406

My Family and I find it appalling that the B.L.M., the U.S. Forest Service, and the Public Service Commissions of Nevada and California would even consider the permission of the proposed Alturas to Reno 345 kv power transmission line.

The proposed route of this transmission line will carve a 165 mile swath of destruction through some of our rapidly disappearing scenic areas on the California/ Nevada border. Particularly in the case of my Family, Myself, and my neighbors, the transmission line is routed high above the horizon across the unspoiled northeast flank of Peavine Mountain. This area is devoid of any such structures and should remain that way.

Contrary to the belief of Sierra Pacific Power Company, unspoiled scenic land has a value to every citizen. And, every citizen has the right to enjoy and the duty to preserve it. The duty to preserve it especially lies with the U.S. Forest Service and the B.L.M. whom the citizens entrust to take the stewardship of <u>our</u> public lands. GP. 128-1

Although the real need for this power line has not been proven to the affected citizens, I suspect that the profit of Sierra Pacific Power Company, not a shortage of power, is the motivating force behind project. While at the same time , the negative impact on the affected citizen's property values has not been addressed by the power company. If the Power Commissioners of California and Nevada truly deem this project necessary, alternate and less conspicuous routes along existing power corridors must be used.

The construction of this transmission line upon the proposed route will be a mistake that too many citizens will only realize after it is too late. On their behalf, I request your agency to follow the will of the citizens and deny the permission of this transmission line as proposed.

Stephen S. Thomas

Stephen S. Thomas
8495 Mohawk Lane
Reno, NV. 89506

Steven Childs, *Reno*

Elected officials

Don't forget people's will

Does it seem too much to ask our elected representatives to actually represent the people or to have public officials truly serve the public? It appears that our government has completely lost touch with the reason it exists.

Two local examples of the people's will being completely ignored by our government are the construction of an unwanted Kmart on McCarran and the Alturas to Reno power line. Not one citizen has spoken in favor of either project, yet the Kmart is on its way and Sierra Pacific is about to carve a 180-mile swath of destruction through the people's land.

In the case of the power transmission line, it's still not too late for our government to impose the people's will on Sierra Pacific and prevent this eyesore from being erected in one of our rapidly disappearing scenic areas.

Our government should not forget the reason this nation was born.

Stephen S. Thomas, *Reno*

No name or return address

RECEIVED
JUN 05 1995
BLM

General Public
Comment Set 129

To Whom It May Concern

RECEIVED
JUN 05 1995

GP. 129-1

I wish to convey to you my feeling of opposition to your plan of constructing the 345,000 volt power lines through our great state. The problem is not where are children living near them. Now tell me is power that we would even use worth poisoning our children. It will expose the residence to the electromagnetic fields, poisoning and possibly killing them.

So please if you value these lives please don't install these lines.

[illegible signature]

617 Pyramid Way Sparks NV. 89431

RECEIVED
JUN 05 1995

General Public
Comment Set 130

MAY 18, 1995

J. HALLIGAN/P. HUNN
CPUC/BLM
ASPEN ENVIRONMENTAL GROUP
30413 CANWOOD ST., SUITE 218
AGOURA HILLS, CA. 91301

RE: ALTURAS INTERTIE, CPUC #93-11-018, BLM # CACA 31406.

DEAR MS. HALLIGAN AND MR. HUNN,

THE DEIR STATES THAT PLANT COMMUNITIES AND SPECIAL STATUS PLANTS WILL BE AVOIDED BY SITING THE STRUCTURES AND ACCESS ROADS OUTSIDE OF THE LIMITS OF THESE RESOURCES, BUT THE DEIR DOES NOT SATISFACTORILY ADDRESS THE SECONDARY IMPACTS OF LOCATING ROADS AND STRUCTURES ADJACENT TO THESE COMMUNITIES. IMPACTS BY DAMAGING AN AREA ADJACENT TO A RESOURCE CAN HAVE AS SIGNIFICANT LONG TERM IMPACT AS DAMAGING THE RESOURCE DIRECTLY. EROSION IS ONLY INDIRECTLY DISCUSSED, AND OTHER FACTORS, SUCH AS CHANGE IN THERMAL, LIGHT AND WIND LEVELS ARE IGNORED. GP. 130-1

HABITATS DEPEND ON THE HEALTH OF ADJACENT HABITATS.

THANK YOU FOR YOUR ATTENTION.

Jane Cardwell
404 Josephine St.
Alturas, Calif 96101

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JUN 05 1995

General Public Comment Set 131

June 2, 1995

Julie Halligan/Peter Humm
C/O Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Re: Alturas Intertie, CPUC #A93-11-018, BLM #CACA-31406

Dear Ms. Halligan and Mr. Humm:

We are vehemently opposed to **Sierra Pacific Power Company's** proposed power transmission line to **Reno, Nevada,** which would run directly through the middle of **Modoc County's** most populated and environmentally sensitive areas. With an already established transmission line corridor in **Nevada,** it is absurd to even consider the **Modoc** route.

How can **Sierra Pacific** so blatantly disregard the rights of **Modoc** residents who choose to live here because of the clean environment, and aesthetic value of this beautiful county.

Because of environmental destruction and health hazards, we believe the new line to **Reno** needs to be placed in the existing corridor already designated for such power lines. We say **"NO"** to this transmission line and the subsequent new corridor which will be established through **Modoc County.** Put it in **Nevada,** where it belongs! GP. 131-1

Respectfully,

Ken & Norma Franklin

Ken & Norma Franklin
Alturas, Modoc County, California

May 31, 1995

Julie Halligan - CPUC / Peter Humm - BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca. 91301

General Public Comment Set 132

Re: Proposed CPUC Power Line through Modoc County California

I have the following comments/questions regarding the proposed power line.

1) Utility Corridor:
Other alternative power line routes have not been adequately evaluated. For example there are already existing right aways in unpopulated northwestern Nevada that can be utilized. Why not utilize a route in a less populated area. (GP. 132-1)

In the EIS future high voltage power lines along the proposed power line route have not been addressed. What are the future plans for expansion and extension of this power line to other metropolitan areas. For example the BPA Power Line you plan to hook into on the Devils Garden was not to be expanded when constructed in 1983. Official asked directly if the power line would be expaned or extended said expansion would not occur. Yet today your asking to expand off of this existing high voltage electrical line. You need to address this question. (GP. 132-2)

2) Visual Aesthetics:
The proposed towers that can be seen on the horizon (sky lining) and through the valley do not conform to the Modoc County Plan. You have not addressed this issue adequately. (GP. 132-3)

People who live in Modoc County and tourists who come to Modoc County come to experience wide open spaces without visual impairments such as high voltage power lines. Visual impairment has not been adequately addressed? What economic effect will the visual impairment have on tourism, people moving to Modoc County, and property owners land values within the visual proximity of the power line? (GP. 132-4)

Burying the power line as it passes through the Valley just west of Alturas to reduce visual impairment has not been addressed. You should address the issue of burying this Power Line. Economics is not an issue either - fore the power company will pass the expense on to the consumer in the metropolitan areas serviced by the power line. Alturas and Modoc County receive no benefit from this high voltage power line fore we have adequate electricity now from power lines in Modoc County. (GP. 132-5)

3) What affect do high voltage power lines have on young developing children and adults? Recent studies in the northwest have indicated that the immune response of sheep can be affected by high voltage power lines. (GP. 132-6)

4) Mediation:
All mediation measures need to be addressed prior to the beginning of construction of the high voltage power line. Sierra Pacific has made it clear that time is money, and money is of greatest importance to them. This indicates that once approved they will not care what impacts the power line will have on the environment and/or humans. There only goal will be to run over everyone to get the power line built. Sierra Pacific should be required to pay for an independent inspector that has the power to terminate construction activities if agreed upon wildlife, visual aesthetics (quality of life) and construction stipulations are not met. (GP. 132-7)

Sincerely

Rick Delmas

Rick Delmas, B.A., M.S.
213 Poplar Street
Alturas, Ca. 96101

6/1/95

Julie Hallgan / Peter Humm
CPUC / BLM
c/o Aspen Environmental Group
30423 Canwood St, Suite 218
Agoura Hills, CA 91301

RECEIVED
JUN 05 1995

General Public
Comment Set 133

RE: Altura Interchange
CPUC # 93-11-018
BLM # CACA 31406

Please note:

On page C.13:32 of the DEIR, it states "While the crossing of Daggett Canyon and the plateau would result in an adverse visual impact, it is not considered significant (Class III)." Why not? The DEIR here, and in so many other places draws a conclusion without evidence or fact. Did the people of the area tell you that this area was of no significant visual concern? Please state the facts that led you to this conclusion. Did you assume that general Forest Service or BLM designated maps would also pertain to this specific area? Did scoping letters or input tell you this was an area of concern or no concern? Does the statement from the Resolution of the Board of Supervisors of the County of Kindar (Resolution #95-66 page 2) "A. In order to reduce the visual sighting effects, preferred route Sections A-A1 Alternate A03 need to be moved North 300 feet and the height of the towers reduced to eighty (80) feet" mean that this area is not considered visually significant? Does the statement from the Kindar County Planning Commission Resolution 95-66 "Segment 101 and Alternate Segment B01 FAIL to protect critical views open to the public and of great value to the public" mean that this area is visually not significant?

(GR 135-1)

Yours sincerely,

Sydney Smith
PO Box 49
Cedarville, CA 96104

RECEIVED
JUN 05 1995

Draft EIR/S Comment Sheet — Proposed Alturas Transmission Line

General Public Comment Set 134

Name: Peggy Lear Bowen
Affiliation: President of Friends of Rancho San Rafael Park
Address: 527 Thoma St.
City: Reno State: Nevada ZIP: 89502
Phone: (702) 3230406 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

As promised, here are two more up-to-date maps than provided to Aspen when they were making their route decisions. These maps are about thirteen years newer. They do show the Evans Creek Dam project that we have been working on since 1987. Aspen was unaware of this project the route of the Alturas transmission line puts in danger of not being built. More growth has occurred since these maps were done. GP 134-1

If both 345 KV lines come into the North Valley Road Sub station and if a catastrophy hit this sub station it would take out all power for this area, (Truckee Meadows, North Valleys etc.)

This is the same arguement used by Sierra Pacific Power Company as to why they should not run the Alturas line directly to the Tracy Power plant east of Sparks. GP 134-2

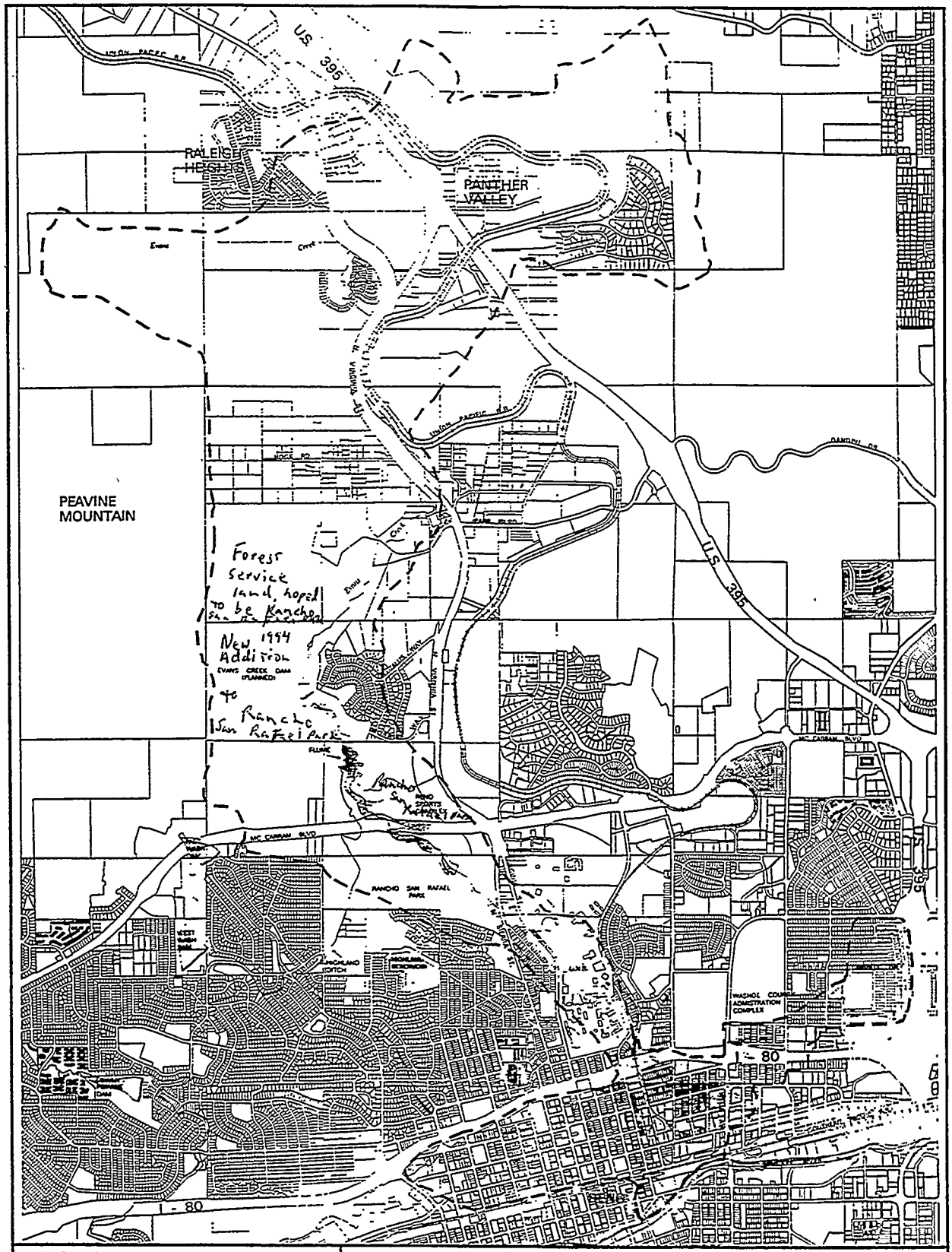
Maybe they should run one of the line to someplace like the Fort Churchill Substation so if one base goes down the other would back up the downed line or substation.

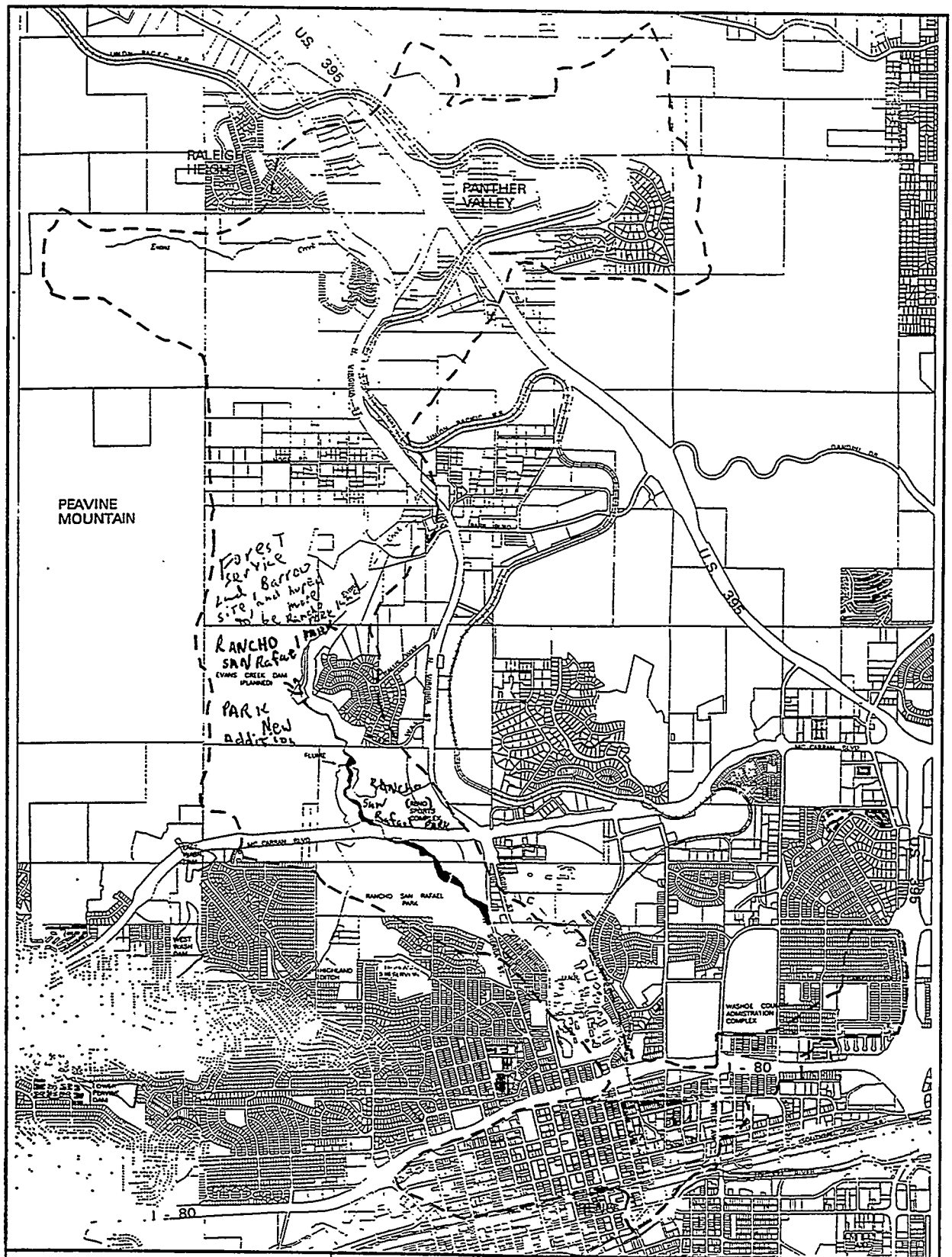
I don't think this line is need at all since we have the New Pinion Pine Coal Fire plant approved.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

I want to make this information easy to find.

These are the same maps given to Aspen at the Airport Plaza work shop (in Reno). They are included in the Evans Creek Dam project report so you have the information in plenty of time to make it part of the EIR/S report.


US 395
RALEIGH HEIGHTS
PANTHER VALLEY
PEAVINE MOUNTAIN
Forest Service land, hoped to be Rancho San Rafael Park
New 1994 Addition
EVANS CREEK DAM (PLANNED)
to Rancho San Rafael Park
FLUME
MC CARRAN BLVD
RANCHO SAN RAFAEL PARK
WASHOE COUNTY ADMINISTRATION COMPLEX
I-80
U.S. DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
FLOOD PLAIN MANAGEMENT
WASHOE COUNTY
NEVADA
DAM BREACH AREA
WATERSHED BOUNDARY
NEVADA
0
1/2
1
MILES
WASHOE COUNTY
DEPARTMENT OF COMPREHENSIVE PLANNING
DAM BREACH LIMITS
EVANS CREEK WATERSHED



U.S. DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE
FLOOD PLAIN MANAGEMENT
WASHOE COUNTY

100 YEAR FLOOD PLAIN WITH PROJECT
100 YEAR FLOOD PLAIN WITHOUT PROJECT
WATERSHED BOUNDARY

0 1/2 1
MILES

WASHOE COUNTY
DEPARTMENT OF COMPREHENSIVE PLANNING

FLOOD PLAINS

EVANS CREEK

JUNE 1994 1009160-01

RECEIVED JUN 05 1995

General Public Comment Set 135

PUBLIC COMMENTS

SIERRA PACIFIC POWER COMPANY

ALTURAS TRANSMISSION LINE PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT/

ENVIRONMENTAL IMPACT STATEMENT

Earth Engineers

Prepared for:

ASPEN ENVIRONMENTAL GROUP

June 1, 1995

Earth Engineers
P.O. Box 640, Millbrae, CA 94030
tel (800) 692-0787
fax (800) 692-0787

INVOICE

Julie Halligan

Peter Humm

Julie, Pete:
FYI.
GM

TO: Ms. Julie Halligan, CPUC
Mr. Peter Humm, BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

FROM: Earth Engineers
R. Mark Armstrong
P.O. Box 1051
Alturas, CA 96101
EIN 94-318-4996

DATE: June 1, 1995

SUBJECT: Public Comments: Sierra Pacific Power Company, Alturas Transmission Line Project, Draft Environmental Impact Report/Environmental Impact Statement. At the request of Aspen Environmental's Project Manager, I became involved in this project.

Research and Review	75 hours @ $ 60/hour	$4,500
Field Work	50 hours @ $ 60/hour	3,000
Preparation of Testimony	80 hours @ $ 80/hour	6,400
Court Time 5/22-5/25	30 hours @ $110/hour	3,300
Report Writing	30 hours @ $ 75/hour	2,250
Production of Documents	42 hours @ $ 45/hour	1,890
Mileage, Telephone, Videotape, Film, Photo and Video Reproduction		625
	Total Currently Due	$21,965

After 30 days a fee of 1.5% per month of total will be added to the total.

Earth Engineers
P.O. Box 640, Millbrae, CA 94030
tel (800) 692-0787
fax (800) 692-0787

June 1, 1995

Ms. Julie Halligan, CPUC
Mr. Peter Humm, BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Subject: SCH # 94042001, CPUC Application No. 93-11-018,
U.S. BLM Case # CACA-31406

Dear Ms. Halligan and Mr. Humm:

We understand that doing Environmental Impact Report/Environmental Impact Statements (EIR/Ss) on projects of this magnitude can be, and is, difficult at times. The magnitude and scope of the investigation require that numerous diverse elements be analyzed for interconnection. It is also important that the client, in this case Sierra Pacific Power Company, cooperate fully with the investigation.

During the public comment period, we became aware of numerous oversights in the Draft EIR/S. Because of the numerous oversights and "fatal flaws" determined during our analysis, it would be in the public's best interest to not allow this project to proceed forward as proposed. The flaws discovered could have far-reaching effects that would cost the public dearly.

Because Sierra Pacific is the proponent of this project, we are billing them, through Aspen Environmental Group, on a strict time and materials basis, as allowed us as an intervener.

Section 15093 of the California Environmental Quality Act (CEQA), Statement of Overriding Considerations, requires decision makers to balance the benefits of a proposed project against unavoidable environmental risks in determining whether to approve a proposed project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable. However, the numerous adverse effects that impact both the existence of species and the quality of life for numerous people, as is evident in the decisions of regulatory bodies that oppose this project, speak volumes to the acceptability of this project. Sierra County opposes the project; Modoc County opposes the project as proposed; and the City of Alturas voted 5-0 on May 30, 1995, to oppose the Alturas Intertie as proposed. We contend that the adverse effects greatly outweigh the benefits to the residents of California. Lassen County could be serviced from the Nevada Corridor.

Due to the time of year of the public comment period, field analysis was difficult, to say the least. At the public hearing in Alturas, California, we asked for additional time, anticipating the difficulties that would arise from conducting field studies in the spring. However, we believe that we have significant evidence that should be considered. This evidence indicates that there are significant environmental risks to the reliability and convenience of the proposed project that outweigh the public need for the proposed project. Some of our analysis has been done in a hastier fashion than we typically are comfortable with. However, we believe, by the weight of the evidence, that this project is ill-conceived and understudied. The proposed alignment has significant unmitigatable adverse environmental and socioeconomic impacts. We have supplied a videotape of portions of our analysis for your consideration. This videotape can be viewed on a standard VHS video cassette recorder (VCR). We are also enclosing our invoice.

Sincerely,

R. Mark Armstrong

Councilman, City of Alturas
California Registered Environmental
Assessor #03713
California Registered Geologist #6134
Registered Professional Geologist

exp 6/96 exp 6/95

PUBLIC COMMENTS

SIERRA PACIFIC POWER COMPANY

ALTURAS TRANSMISSION LINE PROJECT

DRAFT ENVIRONMENTAL IMPACT REPORT/

ENVIRONMENTAL IMPACT STATEMENT

Prepared for:

ASPEN ENVIRONMENTAL GROUP

June 1, 1995

Prepared by:

EARTH ENGINEERS
P.O. Box 1051
Alturas, CA 96101
(916) 233-2068

TABLE OF CONTENTS

Section	Page
Introduction	1
Conclusions	2
Biological Resources	3
Cultural Resources	4
Geology	6
Hydrology	9
Land Use	18
Noise	19
Public Health and Safety	20
Socioeconomic, Public Services	21
Visual Resources	22
Narrative Description of Videotape	23

APPENDICES

A. Figures 1-7

B. Fault Map of California

C. Photos and Simulations

ATTACHMENT 1

Videotape

INTRODUCTION

It is clear, after examining the environmental documentation, that a firm based in the metropolitan Los Angeles area understands neither the sensitive environmental nature nor the rural community nature of Modoc County. It is also apparent that the scope and size of this project overwhelmed Aspen Environmental Group's resources, thereby causing a less-than-adequate analysis of the project. GP. 135-1

Adverse environmental effects caused by the use of hydroelectric power, and source reliability of the hydroelectric power, in the Columbia River basin were not analyzed in the Draft EIR/S. Growth impacts of the Reno/Sparks area and the availability of water to allow growth were not studied. Therefore, nothing but cursory comments on what should be considered fatal flaws can be made in this public comment report. GP. 135-2

Biological resources were not adequately analyzed for a proposed project of this scope, magnitude, duration, and complexity. GP. 135-3

It is the opinion of Earth Engineers that geological provinces should be studied to determine the routing of projects of this scope. This would prevent the long-term problems that would inevitably arise from siting the alignment without addressing the issue of geological provinces. By not using that planning philosophy, numerous unmitigatable problems would arise from the proposed alignment. Because the geology changes at a much slower rate than any other element, geologic concerns should be addressed first. The cost to mitigate concerns of a geologic and hydrologic nature presented by the proposed alignment could be more than the total budget of the proposed project. GP. 135-4

Land use planning is essential when studying a project of this size and magnitude. To ensure that the project is consistent with county General Plans and affected city General Plans, these documents should be studied independently by the proponent or the proponent's consultant. The noise of the power line could be disruptive to both residents and tourists. GP. 135-5

Public health and safety concerns on a project of this size and nature should be expanded beyond the typical concerns related to electromagnetic radiation from power lines. GP. 135-6

The impact on socioeconomic and public services of the proposed Alturas Intertie will be discussed to determine if there is any benefit to Alturas. GP. 135-7

Visual resources would be severely impacted by the proposed alignment. The views from the City of Alturas have not been considered during this process. No method has been devised to compensate those people who would lose valuable visual resources if construction of this alignment proceeds. GP. 135-8

1

CONCLUSIONS

There are numerous Class One mitigatable impacts that have been neither examined nor budgeted into the proposed project. The cost of mitigation may outweigh the benefits of this proposed project. This condition would have been avoided if Sierra Pacific would have made an attempt to use existing corridors. A benefit-versus-cost analysis will be forthcoming from the Honorable Richard Careaga. The true cost must therefore be presented. The Modoc County Supervisors have passed a resolution requesting burial of the power line. The City of Alturas supports this resolution by a vote of 5-0. The cost of burial has been estimated to be $4 million/mile. Stream crossings must be properly engineered and designed, the cost of which has been estimated to be $120 million. These costs would be incurred to mitigate the impacts of this project as proposed. The alignment transects the Likely Fault; the cost of mitigating this portion of the alignment is variable but could be millions of dollars. GP. 135-9

The benefit of this project will go to 40,000 people in the Truckee/Lake Tahoe region, but can those 40,000 people pay for the mitigations required to reduce the impacts of this project to an acceptable level? Or should an alternate route be chosen?

2

BIOLOGICAL RESOURCES

Adverse environmental effects on the osprey were not considered. The osprey is a listed endangered species. Why was this species not analyzed during the Draft EIR/S process? What effects will the loss of or reduction in fish habitat caused by the proposed alignment have on the osprey? GP. 135-10

The north end of the Madeline Plains should be considered a valuable habitat resource for wetlands species like ducks and other creatures. Why was it not considered so? The plants and animals found in the north end of the Madeline Plains indicate that this area should be considered a valuable resource and habitat. Why was it not considered so? What mitigation measures have been devised to protect the Madeline Plains from changes in drainage and fluid flow during construction of the proposed alignment and during annual monitoring of the proposed power line? Were fairy shrimp found in the Madeline Plains? This area appears to be prime habitat for that type of biota. Were the mud flats examined closely to determine if fairy shrimp or other similar biota are present in the mud flats region of the proposed alignment? GP. 135-11

If stream turbidity increases during construction, what endangered turtles, amphibians, and fish species will be lost forever due to the installation of this alignment without proper stream crossings? We don't believe you can answer that question, but it is set forth for your cogitation. GP. 135-12

CULTURAL RESOURCES

The obstruction of views due to this alignment, and the lack of studies on and communication with the Native American people of this area, are of great concern and speak to the unreliability of the Draft EIR/S analysis. The area around Infernal Caverns has great historic and cultural significance and should be further studied. Why were no Native Americans or Native American historians of the area consulted during the Draft EIR/S analysis? The Draft EIR/S discussed on page C.4-17 "A program to identify and make initial contact with Native Americans potentially affected by the Proposed Project is described in Section C.4.1.3.3." Would it not be more prudent to study these highly impacted groups prior to further disrupting their lives? Is this not a violation of case law? GP. 135-13

Why were views from places that could be considered for inclusion in the National Registration of Historic Places, such as the Niles Hotel in Alturas, not addressed? GP. 135-14

As described in the Natural Resources Element of the Modoc County General Plan, there are numerous campgrounds--at Blue Lake in Lassen County; at Patterson; at Mill Creek Falls, Soup Springs, Lower Roberts Reservoir, Dorris Reservoir, and Big Sage Reservoir--that fall in or around the proposed alignment. These resources may be impacted. What studies have been done to determine if these cultural resources will be impacted? What would be the economic impacts on Modoc County? GP. 135-15

The proposed alignment crosses the route of the Applegate Trail. It also crosses the route of the Lassen Trail. It passes near the following historic locations: Dorris Bridge; the grave of Lt. John Madigan; and the camp of a fur brigade of the Hudson Bay Company under the command of John Work. The alignment would be visible from the Nevada-California-Oregon Railroad, which came through Alturas in 1908 and constructed an office in Alturas. The proposed alignment would be visible on Likely Mountain from the Infernal Caverns battleground, Registered State Historical Landmark No. 16. What effect will this alignment have on these cultural and historic resources? What economic impact will this have on the region? By degrading the quality of these sites, less people will be interested in viewing these resources, and the viewings will be less authentic. GP. 135-16

On pages R-7 and R-8 of the Natural Resources Element of the Modoc County General Plan, the following activities are listed, which are engaged in and cherished and therefore should be preserved in Modoc County: horseback riding, hunting, organized sports, rock hounding, scenic drives, trail bike riding, water sports, and winter sports. GP. 135-17 The proposed alignment will be visible from Highway 395 on the entire drive from Alturas to Madeline in Modoc County. Therefore, the alignment is in conflict with statements on page R-8 of the General Plan regarding scenic drives. GP. 135-18

On page 29 of the City of Alturas General Plan, scenic quality and its intangible but important value is mentioned as something to be preserved. GP. 135-18

A significant cultural resource to the City of Alturas is the views. We find it abhorrent and irresponsible of Sierra Pacific to degrade our view over Modoc National Wildlife Refuge by installing a power transmission line that will be visible from Alturas past Likely. What are the long-term economic ramifications for the City of Alturas associated with destroying such a viewshed? GP. 135-19

Page 30 of the City of Alturas General Plan states: "Alturas is located in an area which has rich historical significance and strong cultural heritage. As a result, the area contains numerous historical and cultural resources which are important not only to maintaining Alturas' western rural character but also attracting tourism to the area." We find that this proposed power line would degrade our western rural character, would do nothing to attract tourism, and would degrade our rich historical significance and strong cultural heritage and therefore is not in compliance with the City of Alturas General Plan. GP. 135-20

GEOLOGY

If geology is not considered prior to choosing an alignment for a structure of this significance, financial problems will arise. The proper way to design and build structures of this nature is to start by examining the geology first, not last. It is apparent that geology was not given any consideration in the initial planning phase of this alignment but was studied after the alignment was chosen. Why is that? GP. 135-21

The installation of the proposed power line will establish a corridor. There have not been enough studies to determine if this alignment is appropriate as a corridor. Natural conditions along this alignment may cause an increased maintenance cost as compared with other alignments, and/or as compared with already existing corridors, thereby causing Sierra Pacific to increase the cost of power to its customers. A significant loss of property values due to a natural phenomenon could cause the stock of Sierra Pacific to drop in value. GP. 135-22

There are at least four significant geologic conditions that could cause higher-than-typical installation and maintenance costs. The four conditions have not been studied in the Draft EIR/S to such a level of detail that we would be comfortable determining the additional cost of installation and maintenance; however, we will provide a rough, conservative estimate for each condition. Sierra Pacific may not have planned for these conditions, because these conditions have either not been addressed or have been underaddressed in the environmental documentation provided. We will address the four conditions that occur along this alignment in their order of significance.

As indicated on Map 31 of 33 of the Draft EIR/S, special engineering and construction design criteria are required at stream crossings. The maintenance roads below the power lines require, at the very least, culverts at stream crossings. Some utilities believe they are exempt from Chapter 70 of the UBC; however, utilities are exempt from these requirements for excavation purposes only. The maintenance road under the power line and the access roads will generally require a road base or fill; therefore, the building of the roads under the power lines is a grading activity and not an exempt excavation. Therefore, the utility company should not be exempt from the requirements of Chapter 70 of the UBC. The roads on Devils Garden under the power lines required a road base so that the roads could remain open during the rainy season. These requirements have not always been followed by Sierra Pacific during construction, but to preserve the water quality, prevent erosion, and preserve groundwater potential, surface water crossings must be correctly designed and constructed. This is true if a road is considered permanent or temporary. GP. 135-23

The Draft EIR/S documents two stream crossings, and 16 wetlands or riparian crossings, while in reality there are at least 80 GP. 135-24

crossings (see the Hydrology section of this public comment report). The cost per crossing plus the cost of maintaining each crossing could make this alignment less economically feasible than another alignment. The blatant disregard for the streams and stream crossings must be a purely economic decision on the behalf of Sierra Pacific. The cost of a stream crossing could be as high as $1,500,000 depending on the size of the stream and the requirements of the siting. Sierra Pacific has budgeted two of these crossings, while in actuality this alignment will require at least 80 crossings. The cost differential of this shortsightedness could be $120,000,000, or nearly the entire budget of the project, just for stream crossings that Sierra Pacific wishes to overlook. If stream crossings are not done correctly, the damage to the land and to the watersheds would be environmentally unacceptable. GP. 135-24

Map 6 of 33 of the Draft EIR/S indicates that the present alignment of the proposed power line is directly on the surface trace of the Likely Fault (see Appendix B). Appendix B is a map of active faults or potentially active faults designated by C.F. Richter. The Likely Fault is deemed by the USGS to be active and therefore has moved in historic time. The probability of the Likely Fault moving at least once during the life of this project is extreme. The probability of the Likely Fault moving more than once during the life of this project is good. Designating a corridor along an alignment that follows the surface trace of an active fault seems to be irresponsible if other alignments are available. The cost to stockholders and customers when the fault moves will be at least the cost of rebuilding the five miles of the line. The last 100 years have been a relative quiescent period seismically in California. If the recurrence interval increases to 20 years, if the cost per episode is $650,000, and if the life of this project is 200 years, then the customers and stockholders will be required to pay an additional $6,500,000 for this poor alignment choice. The additional engineering and construction cost to meet the requirements of building the proposed power line across a known active fault would be saved if the proposed alignment were changed. Using the proposed alignment as a corridor would increase the destruction, inconvenience, and power interruptions when the Likely Fault moves, and that is likely to happen. GP. 135-25

Why is the surface trace of the Likely Fault being used as a route for this power line?

To accurately estimate the cost of the damage that would occur to the power line over the life of the line, the reoccurrence interval is required and the maximum probable earthquake must be known. What is the maximum probable earthquake on the Likely Fault? What is the dip and amount of slip on the Likely Fault? Where are the surface rupture locations on the Likely Fault? Can you predict the location of future surface ruptures? GP. 135-26

In the rebuttal testimony of John Owens, the engineer for Sierra Pacific, he displayed a fault map of Nevada; however, active faults in Nevada are sparse.

What is the intensity of the Likely Fault now if an earthquake of Richter magnitude 7.5 occurs on the fault? What will the intensity of the Likely Fault be if the proposed power line is installed? Is it prudent to design a structure on an active fault? Is it sensible to design structures along five miles of an active fault? Is it in our society's best interest to design structures along the surface trace of an active fault? Does the active fault affect the reliability of the proposed power line? Will it be convenient to have to fix a power line if it falls down during an earthquake? Is it necessary for this power line to transverse the surface trace of the Likely Fault? Would it not be more prudent to align this structure in another location? What evidence do you have that indicates this power line will withstand a Richter magnitude 7.5 earthquake with surface rupture on the Likely Fault? It is evident from the qualifications of John Owens that he has never designed structures in the State of California. What gives you the confidence to believe the proposed structures will meet the requirements set forth by the State of California? GP. 135-26

The fault located just east of APN2 may have a sister fault or splay that would intersect the power line at mile marker 2. Evidence in the road cut indicates that this may be true. The fault trending northeast-southwest and the surface trace that has been mapped less than 300 feet from the substation could be dipping under the substation, thereby causing inherent weaknesses in the underlying rock. If the fault system is not studied more completely, the weight of the structures that is applied to the rock may cause the rock to fail and damage the towers or the substation. Therefore, it would only be prudent to study the fault system with seismic methods or physical methods to determine the strength of the underlying rock at the substation site. Why was this not done in the Draft EIR/S? There appear to be fractures and offset in the Modoc lava near the road cut. Has that been examined? GP. 135-27

HYDROLOGY

The Draft EIR/S has identified that at mile posts 156 and 160 there are stream crossings that represent sensitive habitat. The stream crossings plan has not been presented in the Draft EIR/S, which should be considered a fatal flaw of the Draft EIR/S. Federal law (Section 404 of the Clean Water Act; and the Pollution Prevention Act) requires that water quality be protected during construction. A derivative of the Clean Water Act, the National Pollution Discharge Elimination System, requires that stream turbidity be controlled during construction. Stream crossing will require that the stream quality be protected. To protect the quality of the stream, the stream must be studied so that the crossing can be properly engineered. The culvert size needs to be large enough to carry the total volume of the stream during high water. The cost to engineer each stream crossing will involve a separate hydrology study for each stream crossed. Only two streams along the alignment are designated in the Draft EIR/S as sensitive habitat. We are sure that the other streams that are being crossed by this alignment are simply an oversight, because we are sure that Sierra Pacific would not want to just drive across our streams, leaving ruts and poor water quality in their wake. If the crossings are not engineered properly, the streams will erode the road at the crossing, degrading water quality and degrading habitat.

The habitat degraded will be the area of the crossing and the area downstream from the crossing for miles. As we are well aware, stream habitat is very important to human and animal well-being. The degradation of water quality by poorly engineered stream crossings will affect all the animal life in the region and also the humans in the area who make their living on the land.

GP. 135-28

Because stream crossings are so important, why on map 1 of 33 was the crossing of West Rock Creek at approximately mile post 2.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 1 of 33 was the crossing of Rock Creek at approximately mile post 2.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 1a of 33 was the crossing of West Rock Creek at approximately mile post 2.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 1a of 33 was the crossing of Rock Creek at approximately mile post 2.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 2 of 33 was the crossing of the creek at approximately mile post 6.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 2 of 33 was the crossing of the creek at approximately mile post 7.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 2 of 33 was the crossing of the creek at approximately mile post 9.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 2 of 33 was the crossing of the creek at approximately mile post 10.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 3 of 33 was the crossing of the creek at approximately mile post 12.7 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 3 of 33 was the crossing of the creek at approximately mile post 14.6 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 5 of 33 was the crossing of the creek at approximately mile post 22.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 5 of 33 was the crossing of the creek at approximately mile post 23.8 not delineated as sensitive habitat?

GP. 135-28

Because stream crossings are so important, why on map 6 of 33 was the crossing of the creek at approximately mile post 28.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 6 of 33 was the crossing of the creek at approximately mile post 28.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 6 of 33 was the crossing of the creek at approximately mile post 31 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 7 of 33 was the crossing of the creek at approximately mile post 31.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 7 of 33 was the crossing of the creek at approximately mile post 33 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 7 of 33 was the crossing of the creek at approximately mile post 34.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 7 of 33 was the crossing of the creek at approximately mile post 34.9 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 7 of 33 was the crossing of the creek at approximately mile post 35.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 7 of 33 was the crossing of the creek at approximately mile post 35.7 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 7 of 33 was the crossing of the creek at approximately mile post 36.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 13 of 33 was the crossing of the creek at approximately mile post 64.6 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 14 of 33 was the crossing of the creek at approximately mile post 68.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 14 of 33 was the crossing of the creek at approximately mile post 69 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 14 of 33 was the crossing of the creek at approximately mile post 70.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 14 of 33 was the crossing of the creek at approximately mile post 71.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 14 of 33 was the crossing of the creek at approximately mile post 72 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 15 of 33 was the crossing of the creek at approximately mile post 72.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 15 of 33 was the crossing of the creek at approximately mile post 72.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 15 of 33 was the crossing of the creek at approximately mile post 73 not delineated as sensitive habitat?

11

GP. 135-28

Because stream crossings are so important, why on map 15 of 33 was the crossing of the creek at approximately mile post 73.9 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 15 of 33 was the crossing of the creek at approximately mile post 74.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 15 of 33 was the crossing of the creek at approximately mile post 75 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 16 of 33 was the crossing of the creek at approximately mile post 80 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 18 of 33 was the crossing of the creek at approximately mile post 88.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 18 of 33 was the crossing of the creek at approximately mile post 88.6 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 19 of 33 was the crossing of the creek at approximately mile post 93.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 20 of 33 was the crossing of the creek at approximately mile post 98.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 24 of 33 was the crossing of the creek at approximately mile post 118.7 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 24 of 33 was the crossing of the creek at approximately mile post 119.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 24 of 33 was the crossing of the creek at approximately mile post 120.7 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 24 of 33 was the crossing of the creek at approximately mile post 121.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 24 of 33 was the crossing of the creek at approximately mile post 121.8 not delineated as sensitive habitat?

GP. 135-28

12

Because stream crossings are so important, why on map 24 of 33 was the crossing of the creek at approximately mile post 122.6 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 25 of 33 was the crossing of the creek at approximately mile post 124.2 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 25 of 33 was the crossing of the creek at approximately mile post 124.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 25 of 33 was the crossing of the creek at approximately mile post 124.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 25 of 33 was the crossing of the creek at approximately mile post 127.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 25 of 33 was the crossing of the creek at approximately mile post 128 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 27 of 33 was the crossing of the creek at approximately mile post 134.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 27 of 33 was the crossing of the creek at approximately mile post 137.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 28 of 33 was the crossing of the creek at approximately mile post 139.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 28 of 33 was the crossing of the creek at approximately mile post 142.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 28 of 33 was the crossing of the creek at approximately mile post 142.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 28 of 33 was the crossing of the creek at approximately mile post 142.6 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 28 of 33 was the crossing of the creek at approximately mile post 143.2 not delineated as sensitive habitat?

13

GP. 135-28

Because stream crossings are so important, why on map 28 of 33 was the crossing of the creek at approximately mile post 143.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 29 of 33 was the crossing of the creek at approximately mile post 143.9 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 29 of 33 was the crossing of the creek at approximately mile post 144.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 29 of 33 was the crossing of the creek at approximately mile post 145.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 29 of 33 was the crossing of the creek at approximately mile post 146.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 29 of 33 was the crossing of the creek at approximately mile post 146.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 29 of 33 was the crossing of the creek at approximately mile post 147.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 30 of 33 was the crossing of the creek at approximately mile post 149 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 30 of 33 was the crossing of the creek at approximately mile post 149.2 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 30 of 33 was the crossing of the creek at approximately mile post 150.9 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 31 of 33 was the crossing of the creek at approximately mile post 154.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 31 of 33 was the crossing of the creek at approximately mile post 155.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 31 of 33 was the crossing of the creek at approximately mile post 156.1 delineated as one of the only creeks that is considered to be sensitive habitat?

GP. 135-28

14

Because stream crossings are so important, why on map 31 of 33 was the crossing of the creek at approximately mile post 157.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 31 of 33 was the crossing of the creek at approximately mile post 157.6 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 31 of 33 was the crossing of the creek at approximately mile post 158.2 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 31 of 33 was the crossing of the creek at approximately mile post 158.4 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 159 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 159.2 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 160 delineated as sensitive habitat while 89 other streams were not? GP. 135-28

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 160.2 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 160.8 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 161.3 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 161.5 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 162.2 not delineated as sensitive habitat?

Because stream crossings are so important, why on map 32 of 33 was the crossing of the creek at approximately mile post 162.8 not delineated as sensitive habitat?

Stream crossings are environmental issues that must be addressed fully, and the Draft EIR/S has obviously not addressed this issue in any detail. Fish will be affected, along with other types of aquatic life. Flooding and erosion will increase along stream banks if the crossings are not engineered correctly. GP. 135-28

Worker safety is also an issue. If a crew is required to go out to fix a line hit by lightning during a storm and the stream crossings are not designed properly, then the crew may become stuck, or worse. GP.2 135-29

What is the farthest distance a worker will have to walk for help if stuck in a stream bed under the alignment?

By ignoring the stream crossings mentioned above, at a minimum the following endangered plant life could and most likely would be affected:

Alisma gramineum
Calochortus longebarbatus
Carex atherodes
Carex sheldonii
Corydalis caseana ssp. caseana
Downingia laeta
Drosea anglica
Gratiola heterosepala
Opuntia pulchella

GP. 135-30

Which one of the aforementioned plants would it be acceptable to lose?

The additional erosion and sedimentation caused by the lack of an engineered stream crossing could cause endangered species of plants to no longer exist in this area, taking a significant habitat and resource away from this area.

By ignoring the stream crossings mentioned above, at a minimum the following endangered fish could and most likely would be affected:

Chasmistes brevirostris
Deltistes luxatus
Catostomus microps
Lavinia symmetricus mitrulus
Mylopharodon conocephalus

GP. 135-31

Which one of the aforementioned fish would it be acceptable to lose?

The additional erosion and sedimentation caused by the lack of an engineered stream crossing could cause endangered species of fish to no longer exist in this area, taking a significant habitat and resource away from this area.

By ignoring the stream crossings mentioned above, at a minimum the following endangered amphibians and reptiles could and most likely would be affected:

Rana pretiosa
Scaphiopus intermontanous
Clemmys marmorata marmorata

The additional erosion and sedimentation caused by the lack of an engineered stream crossing could cause endangered species of amphibians and reptiles to no longer exist in this area, taking a significant habitat and resource away from this area.

Which one of the aforementioned amphibians and reptiles would it be acceptable to lose? GP. 135-32

As we are all aware, the fabric of nature is intertwined. If one creature or a group of creatures is removed from an environment, the balance is offset. If the balance is lost, it becomes very difficult for the environment to recover. The northeast portion of California is one of the last strongholds for some endangered species. These species may be pushed over the edge if the water quality is allowed to be degraded.

Because not only endangered species will be lost but habitat lost as well if stream crossings are not engineered correctly, the ramifications could force additional animals onto the endangered species list. GP. 135-33

With all the cumulative impacts that would occur by ignoring stream crossings, why were so many of the stream crossings along the right-of-way ignored during the planning of the alignment?

Wetlands

The Madeline Plains (see videotape and Figure 7) and mud flats should be examined further to determine the nature and extent of the wetlands in these areas. Photographic evidence and six months of observations indicate that these areas are wetlands. What evidence do you have that indicates the north end of the Madeline Plains is not a wetlands? GP. 135-34

LAND USE

As a society, we have determined that it is important to have specific areas designated for specific uses. This is the concept known in the planning field as zoning. With respect to utilities of the nature and type discussed in the Draft EIR/S, existing utility corridors should be utilized whenever possible. There is an existing utility corridor that proceeds east from Alturas over Cedar Pass. There is an existing utility corridor in Nevada. The General Plan of Modoc County states that terrain features shall be protected. Yet from the City of Alturas, this utility will be seen along nearly the entire route in Modoc County. The Modoc County Supervisors, along with the Modoc County Planning Department, have developed further mitigation measures to move the alignment back from the rim on Devils Garden and bury the alignment across the Pit River Valley. Burial is most likely cost-prohibitive and infeasible. However, Sierra Pacific should have planned to use existing utility corridors for the entire alignment, if possible. GP. 135-35

Could chairlifts be supported by these type of tower structures? Has any consideration been given to the value of the views that would be destroyed along this alignment? Has any consideration been given to the Elements within the Modoc County General Plan that indicate terrain features are not to be degraded? Has any consideration been given to the CEQA sections that indicate terrain features should not be degraded? GP. 135-36

Has any consideration been given to the possibility of generating power closer to the need for power, i.e., the Reno/Sparks area? When the future Nevada power plant comes on line, will that not alleviate the need for this proposed transmission line? GP. 135-37

Why does this proposed power line not use existing utility corridors? Will this proposed power line create a new utility corridor south from Alturas in Modoc County? Have there been adequate studies along this alignment to create a new utility corridor? Because there have not been enough studies to allow this alignment to become a new utility corridor and because placing this line will cause this alignment to become a new utility corridor, why should we, the public, allow Sierra Pacific to place a line without proper analysis of the alignment? GP. 135-38

It should be noted, and have you considered, the opinion of the Alturas City Council voting 5-0 in support of the Modoc County Supervisors' Resolution, as stated previously?

NOISE

A 345 kV line will cause a low murmur/hum. Have the psychological health effects of that type of noise pollution been studied adequately? GP. 135-39

19

PUBLIC HEALTH AND SAFETY

Modoc County is a rural area. Receiving notices of disasters and other news can be difficult at times in rural areas. Many families in the area are living below the poverty level. Others just refuse to have televisions in their homes. Therefore, the major source of information is via radio. After 10 P.M., the local Alturas radio station goes off the air. Therefore, many people listen to the long-range "skip" of KGO from San Francisco, KOA from Denver, and other stations from San Francisco, Reno, Salt Lake City, Los Angeles, Albuquerque, and other areas. Has consideration been given to the loss of these information sources? By what method would Sierra Pacific compensate for or regenerate these information sources? GP. 135-40

When driving long distances, many commercial truck drivers and passenger car drivers find the radio to be stimulating, keeping them awake and alert. Placing the proposed power line along Highway 395 will definitely interfere with radio reception. Has any consideration been given to the rights of the public to utilize these radio frequencies? Has any consideration been given to the safety effects of radio listening during long drives? GP. 135-41

Opening up new terrain without properly designed roads will definitely cause people to become stranded in remote areas miles from the nearest telephone or service. What safeguards have been contemplated to reduce the risk of people becoming stranded while driving on improperly constructed and poorly maintained roads? GP. 135-42

Sierra Pacific's surveyors have been in areas that are typically and for good reason not visited in the springtime. The surveyors' vehicles have become stuck and have torn up the roads. What plan has been devised to repair the damage already done to roads in Modoc County? What plans have been devised to compensate those who have become stuck, and those who will become stuck, in the ruts created by Sierra Pacific's surveyors? GP. 135-43

20

SOCIOECONOMIC, PUBLIC SERVICES

Realizing that Alturas is a rural community that has begun proceedings against Pacific Power & Light (PP&L) to condemn and then operate the utilities supplying electricity to Alturas, and realizing that, under direct testimony, Sierra Pacific testified that Alturas was "targeted" as the source of power even though Alturas produces no power, was there any motive for the targeting of Alturas? The existing transmission line on Devils Garden could have been tapped into at any location between Alturas and Canby, or northeast of Alturas, in an existing utility corridor. Was Alturas targeted because we are a poor, rural community with a low population? Was any consideration given to the visual, aesthetic appeal of the Alturas area? Numerous viewsheds were overlooked in the Draft EIR/S. Is this another case in which a rich community (Sparks, Nevada) can force a poor community (Alturas, California) to suffer the impacts of an industrial project from which only the rich community benefits? GP. 135-44

Has Alturas been offered any compensation for the impacts this proposed power line is going to impose upon the city's economic future? GP. 135-45 Does Alturas gain any short-term benefit from the Alturas Intertie? Does Alturas gain any long-term benefit from the Alturas Intertie? How long will the Alturas Intertie satisfy the growing needs of the Reno/Sparks area? How many more "Alturas Interties" will Alturas be forced to endure? GP. 135-46

VISUAL RESOURCES

Upon close examination of the USGS 1:24,000 scale topo maps, including Big Sage Reservoir, Mahogany Ridge, Alturas, Infernal Caverns, Likely, Holbrook Canyon, Madeline, Tule Mountain, and by floating balloons on a 130-foot string to confirm our observations from the USGS maps, we have determined that the proposed route will be visible from Alturas from the point where it begins to cross Daggett Canyon, across the Pit River Valley, along the majority of the bluff above the South Fork of the Pit River, across most of Likely Mountain, to where we will finally see it disappear as it crosses into Lassen County and over Harter Flat (see Appendix A, Figures 1 through 6). There is nowhere else in Modoc County where a population of this size has been subjected to such an intrusive and abhorrent visual impact on the pristine nature of our viewsheds. Why has no consideration been given to the viewsheds of the City of Alturas, even though, in our General Plan, we stipulate our area's rural, aesthetic nature? Why were views of Mt. Shasta not included in the Draft EIR/S (see Appendix B, photos 1, 2, and 3)? Why were views of Likely Mountain not included in the Draft EIR/S (see Appendix B, photos 4, 5, 6, and 7)? Photos 4, 5, 6, and 7 were captured from the videotape included. Why were views from the portion of Highway 395 looking west at, for instance, Infernal Caverns, not included in the Draft EIR/S? Could views of a power line of the proposed type going over Cedar Pass be mitigated by designing the structure to carry chairlifts for downhill skiing? GP. 135-47

NARRATIVE DESCRIPTION OF VIDEOTAPE

The beginning of the videotape was taken from Alturas, showing what is presently the proposed route. The videotape shows that the proposed route would be visible across Daggett Canyon, off Devils Garden across the Pit River Valley, where on a clear day Mt. Shasta is visible. The videotape shows where the alignment would be visible on the other side of the ridge. Approximately 80 vertical feet of the proposed line would be visible for the entire alignment. The proposed line would not be hidden by any terrain features from the viewpoints in Alturas.

The next portion of the videotape was taken while driving along Highway 395 and stopping next to Highway 395 in the Madeline Plains. The videotape shows that the north end of the Madeline Plains is clearly a wetlands and should be protected as such. The videotape clearly shows prime habitat for wetlands ducks, sandhill cranes, and other creatures.

The following portion of the videotape shows the span of the Likely Fault. Not shown on the videotape but examined were areas of surface rupture.

The next portion of the videotape shows why proper mitigation of stream crossings is so important. It shows what happens when the surveyors tear up a road and then the public tries to use that road. It also shows what effect poorly mitigated stream crossings would have on water quality, biota, and habitat.

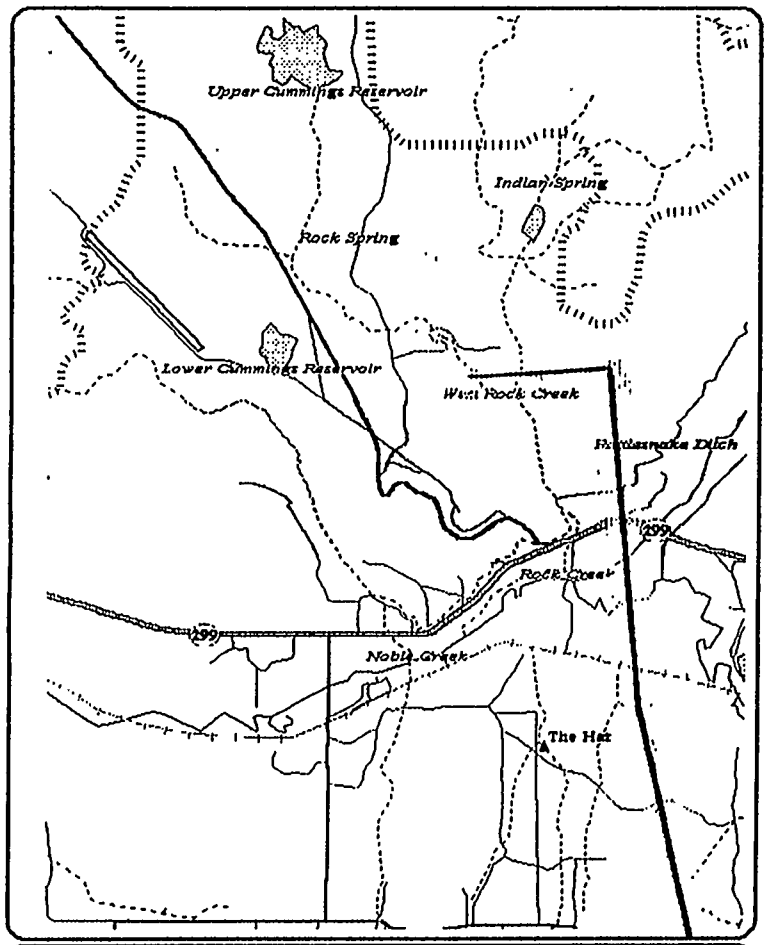
The next portion of the videotape was taken in Nevada, showing the difference between the California terrain of the proposed route and the Nevada terrain of the existing corridor. The roads under the power lines are shown, and the noise generated by the power lines is recorded.

The following portion of the videotape shows how the Nevada alignment avoided a wetlands known as Mosquito Lake.

The next portion of the videotape shows the Nevada alignment in a mountainous area, noting the difference in visual perspective.

The final portion of the videotape shows the type of environment and habitat found in Modoc County.

APPENDIX A



Earth Engineers

Figure 1:

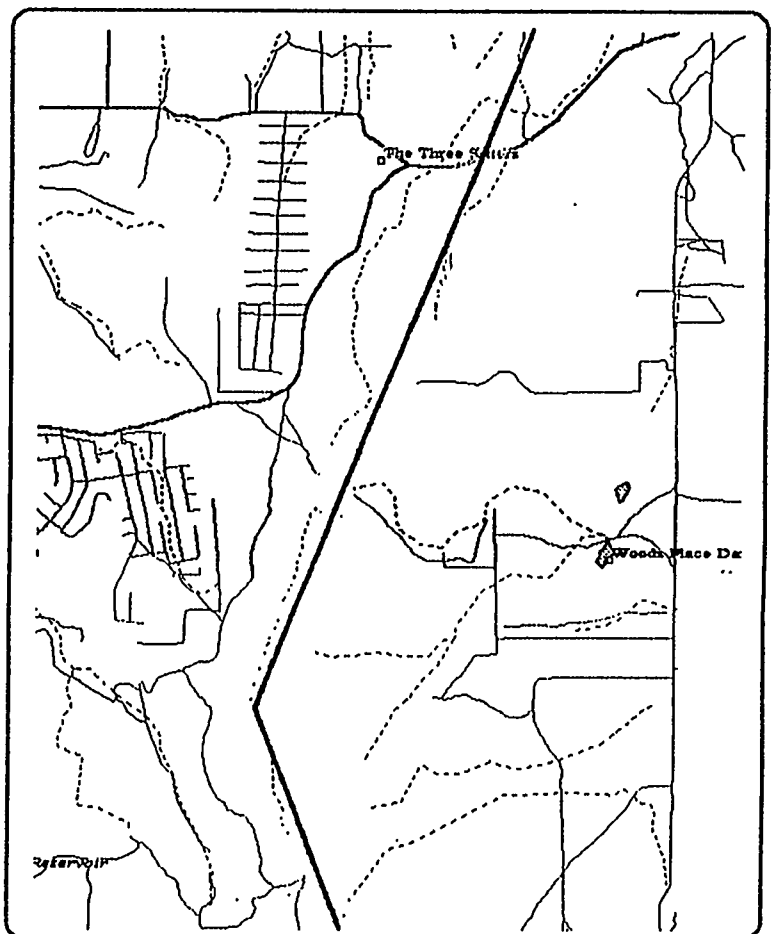
Streams dashed where intermittent

Road

Alignment (center lined where visible from Alturas)

Scale 1:62,500

North



Earth Engineers

Figure 2:

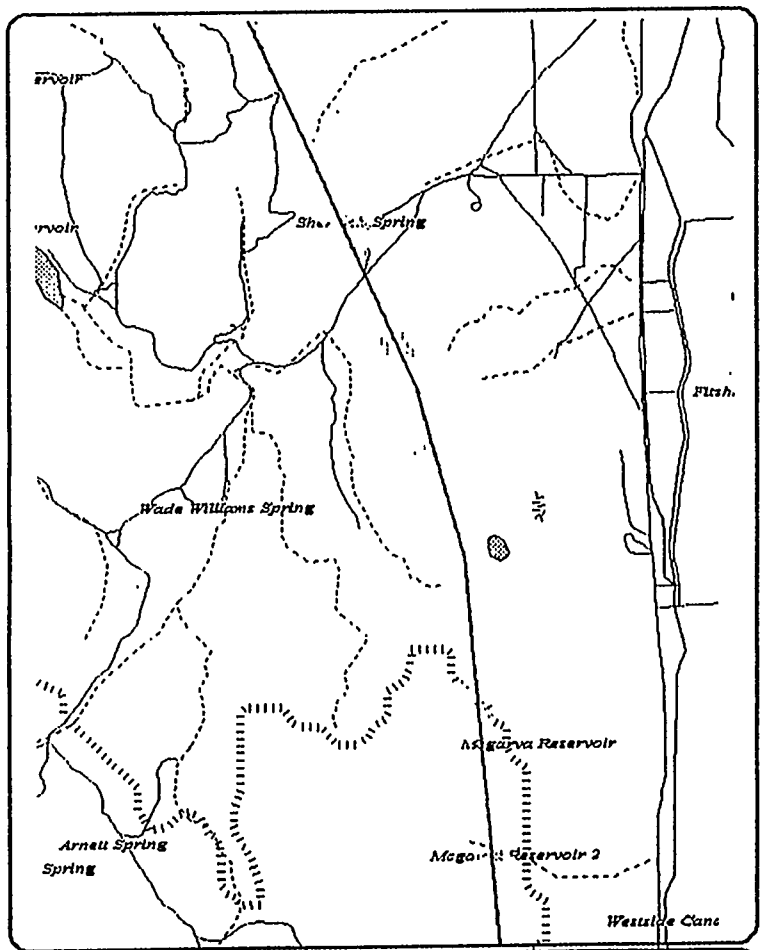
Streams dashed where intermittent

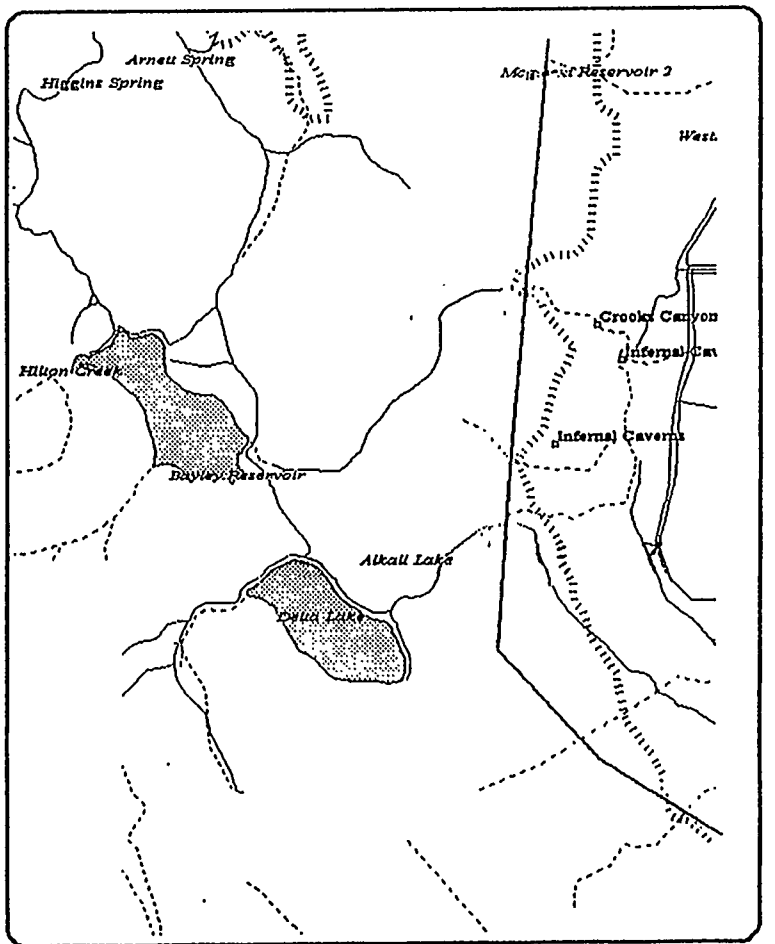
Road

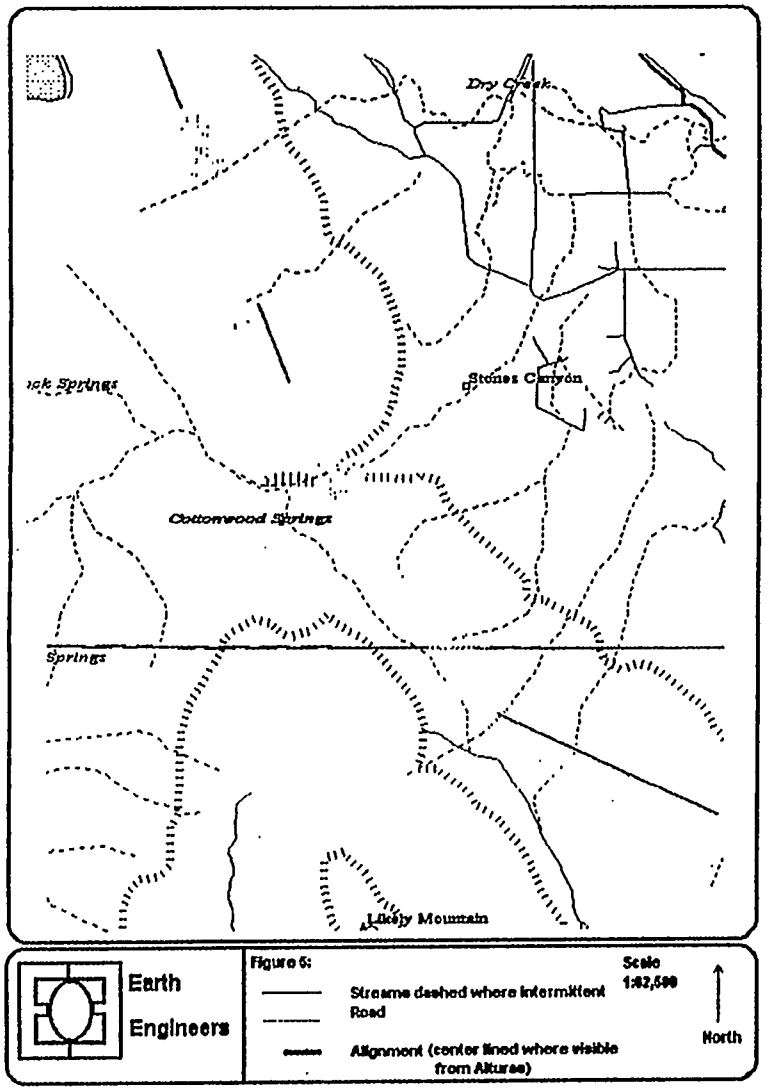
Alignment (center lined where visible from Alturas)

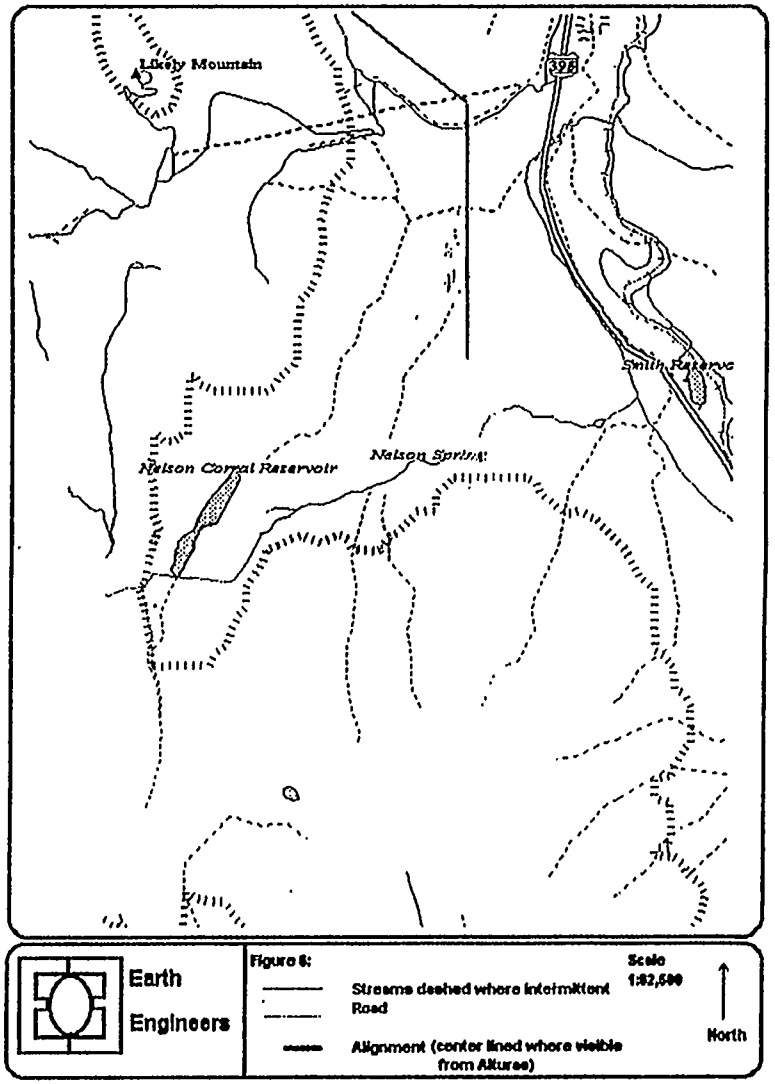
Scale 1:62,500

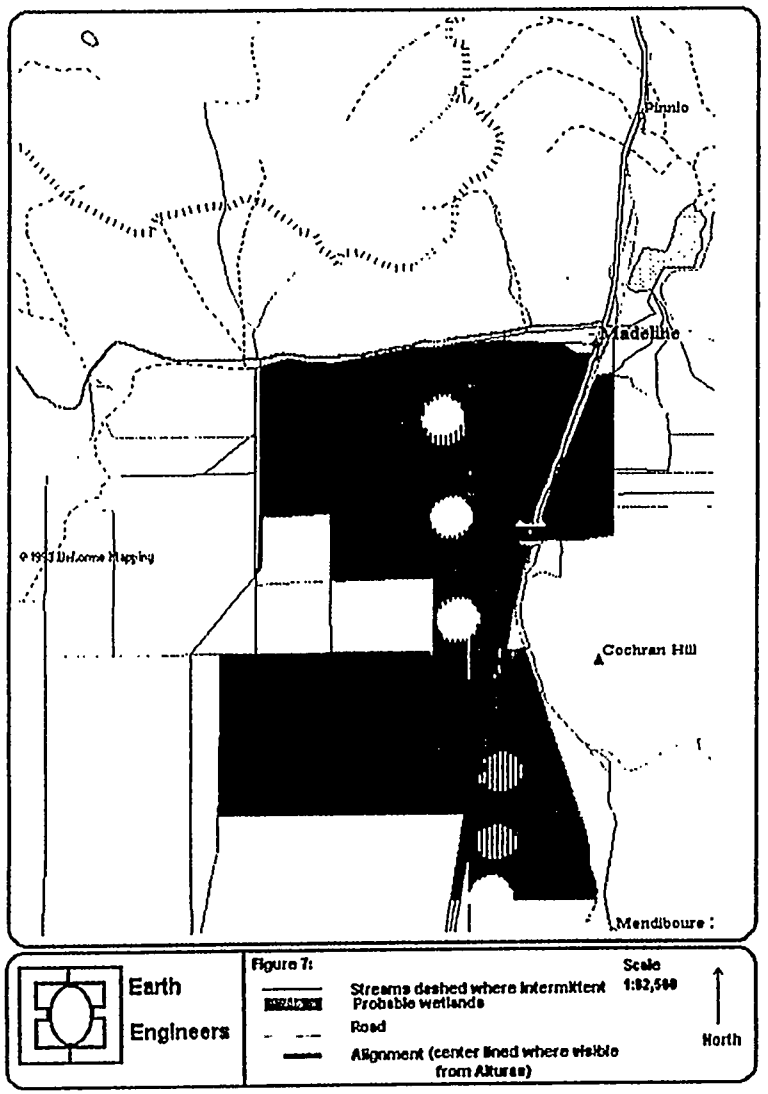
North


Wade Williams Spring
Arneil Spring
Spring
Flish.
Earth
Engineers
Figure 3:
Streams dashed where intermittent
Road
Alignment (center lined where visible from Altures)
Scale
North

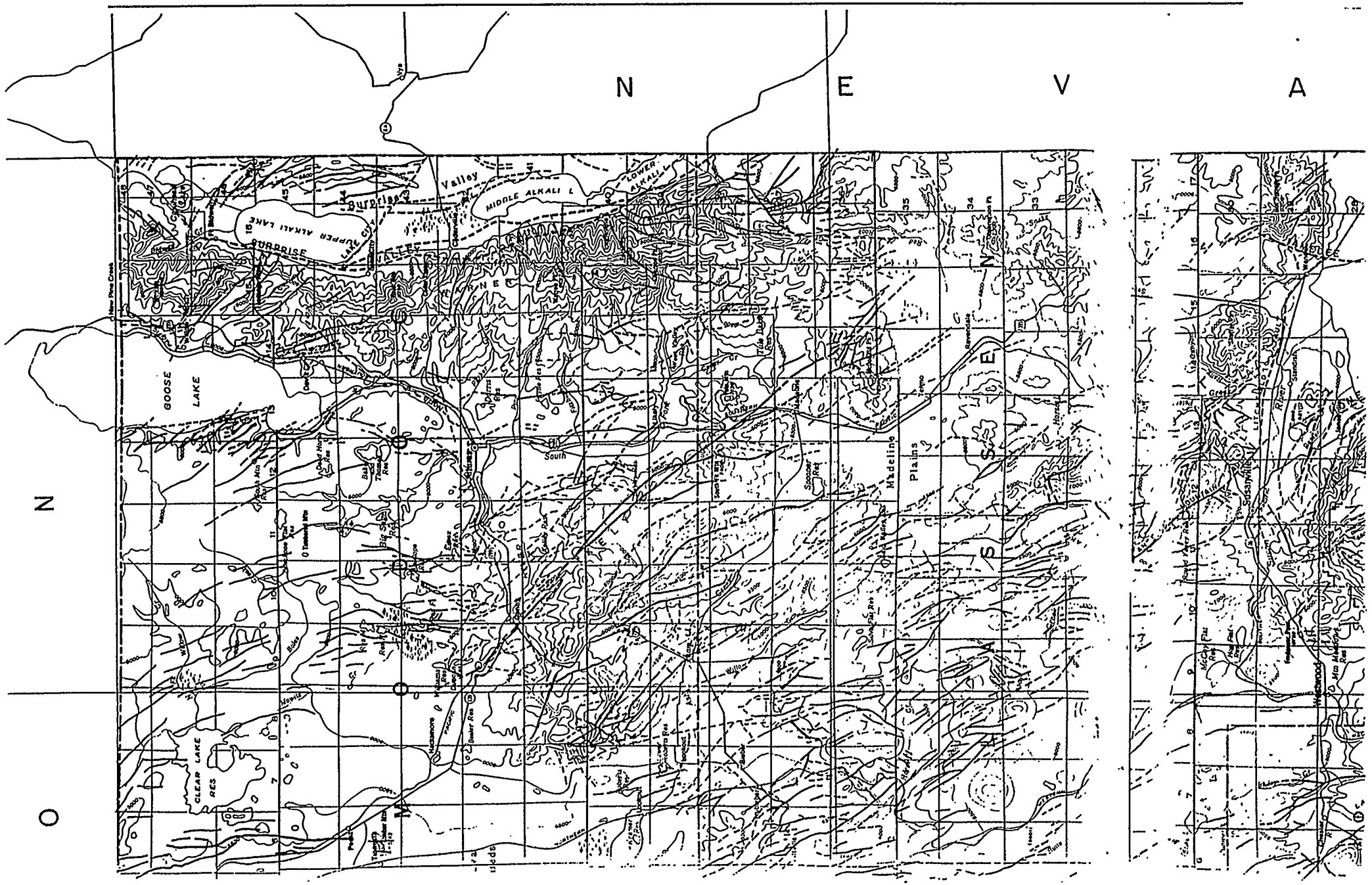

Arneil Spring
Higgins Spring
Hilton Creek
Bayley Reservoir
Alkali Lake
Crooks Canyon
Infernal Caverns
West
Earth
Engineers
Figure 4:
Streams dashed where intermittent
Road
Alignment (center lined where visible from Altures)
Scale
North

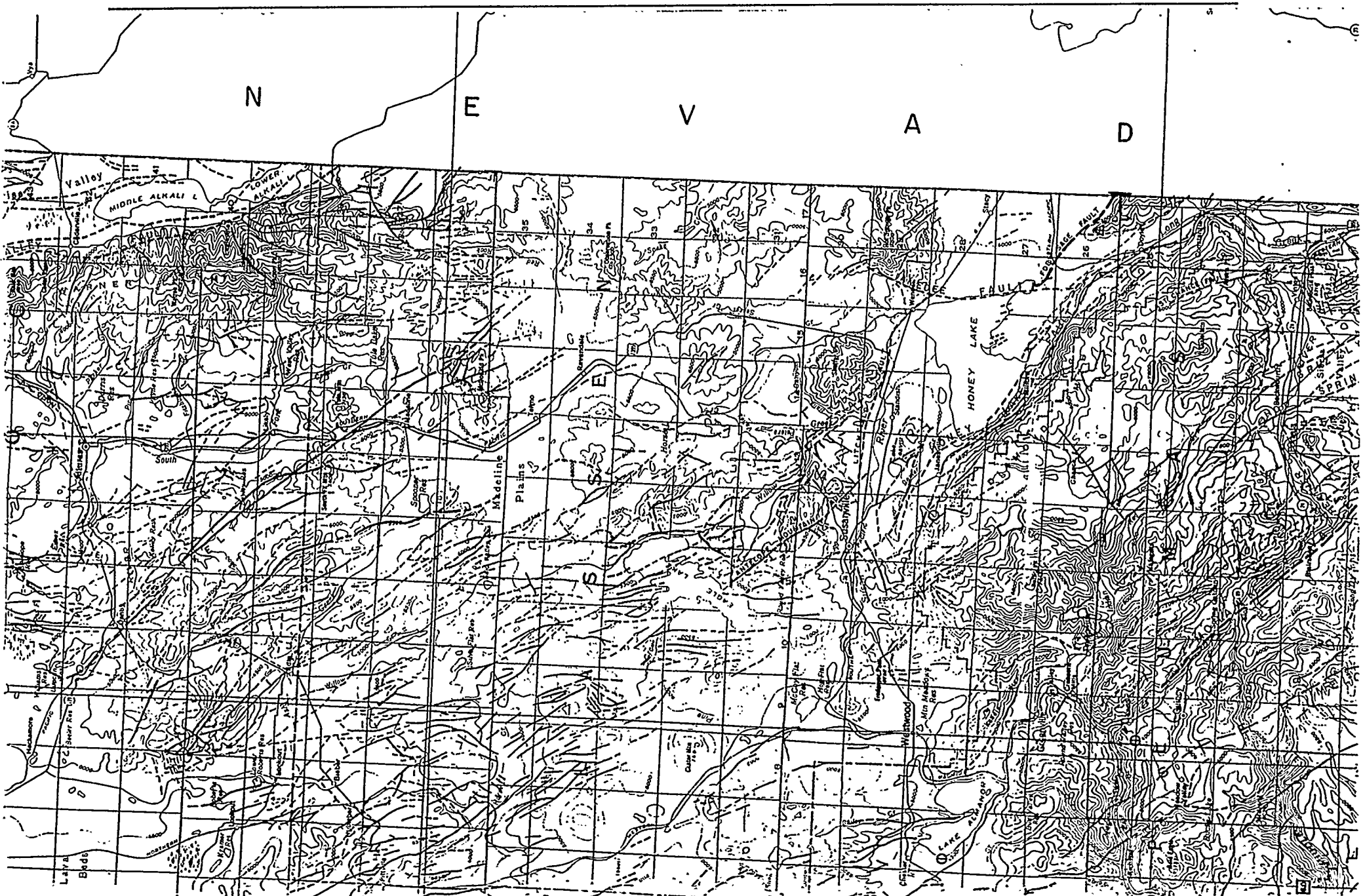

Dry Creek
Stones Canyon
Cottonwood Springs
Springs
Likely Mountain
Earth
Engineers
Figure 6:
Streams dashed where intermittent
Road
Alignment (center lined where visible from Alturas)
Scale
1:62,500
North


Likely Mountain
Nelson Corral Reservoir
Nelson Springs
Earth
Engineers
Figure 6:
Streams dashed where intermittent
Road
Alignment (center lined where visible from Alturas)
Scale
1:62,500
North

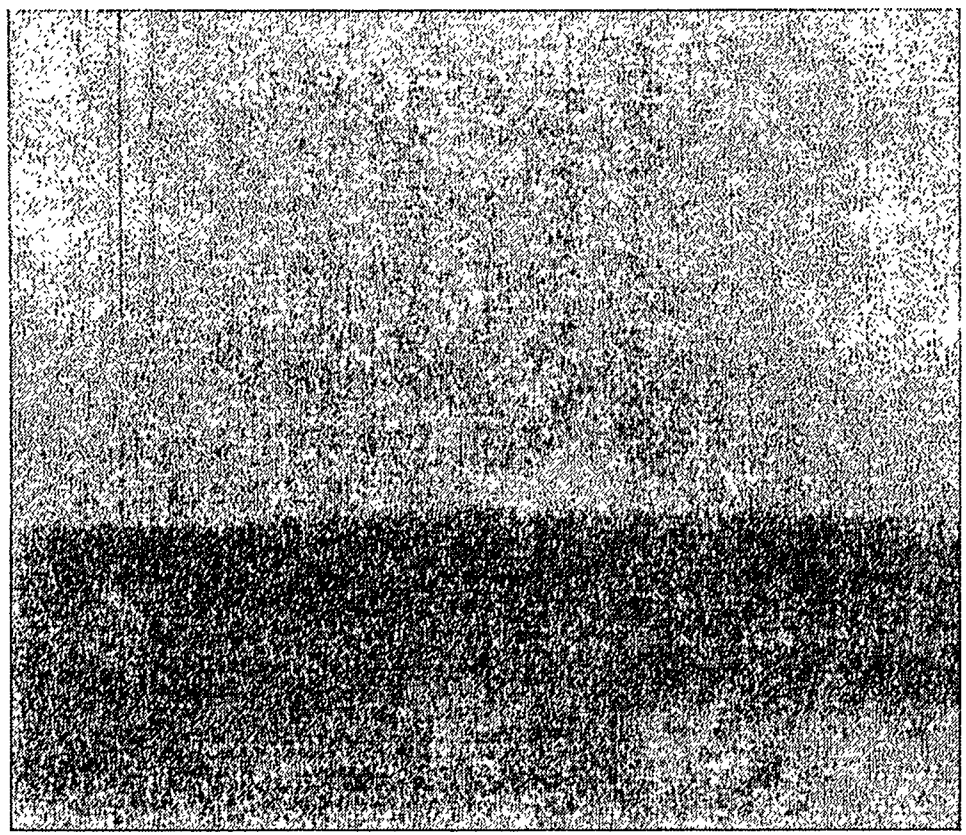

Pinnlo
Madeline
Cochran Hill
Mendiboure
Earth
Engineers
Figure 7:
Streams dashed where intermittent
Probable wetlands
Road
Alignment (center lined where visible from Alturas)
Scale
1:32,500
North

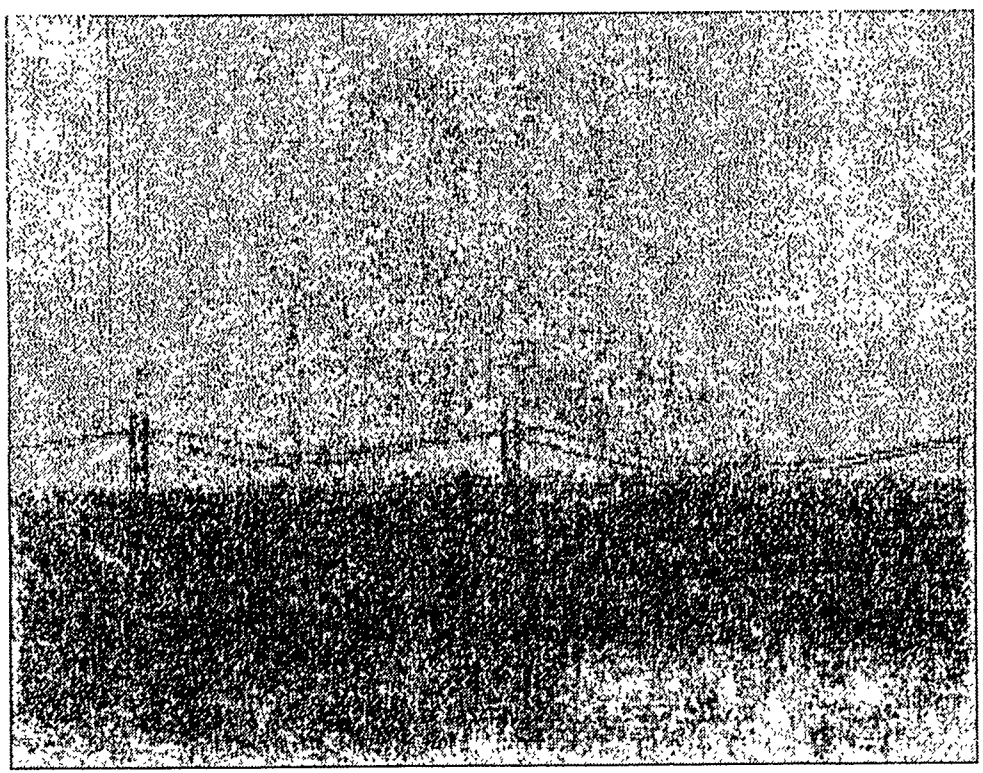
APPENDIX B

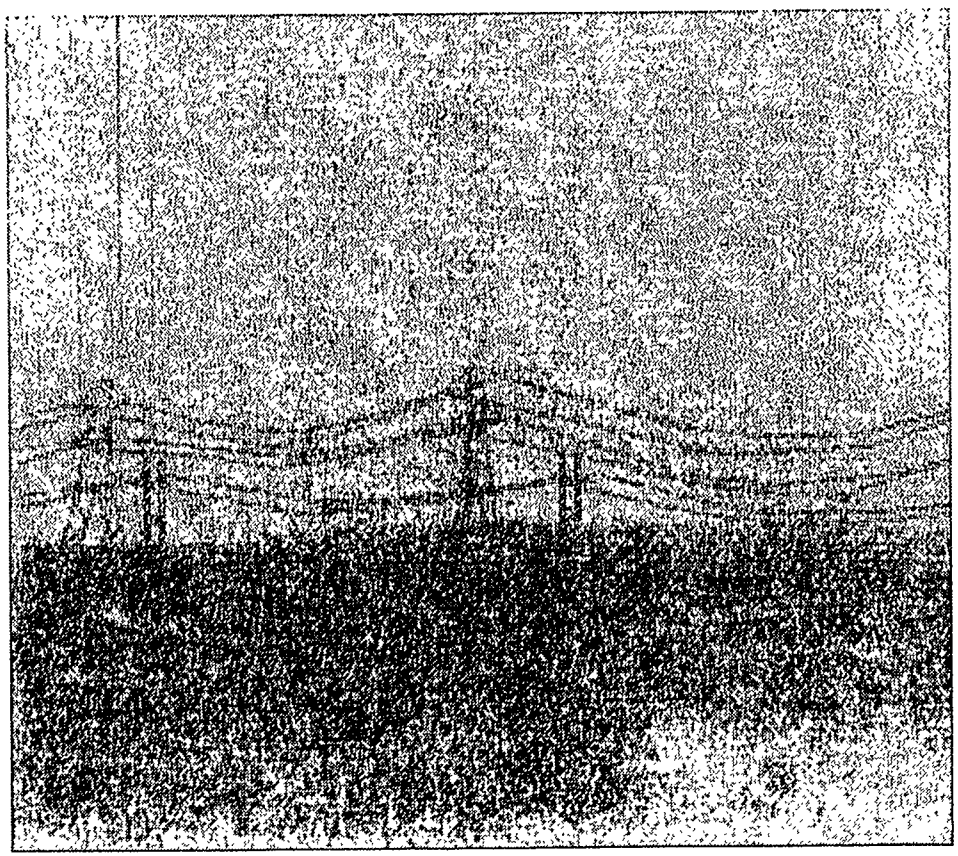

N
E
V
A
N
O
GOOSE LAKE
CLEAR LAKE RES
UPPER ALKALI LAKE
MIDDLE ALKALI L
LOWER ALKALI L
Surprise Valley
Madeline Plains
Susanville

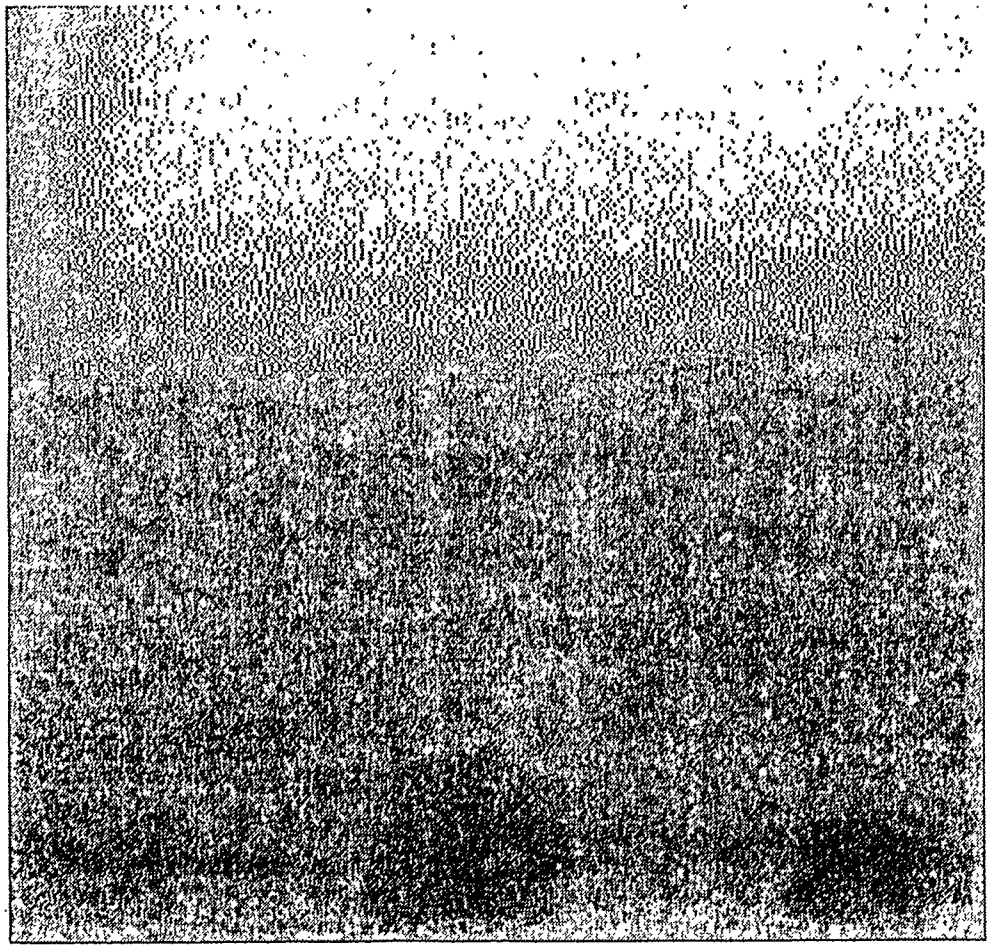

N E V A D
Valley
MIDDLE ALKALI L
LOWER ALKALI L
Madeline
Plains
HONEY LAKE
FAULT
LAKE ALMANOR
Westwood
Lassen
Bado

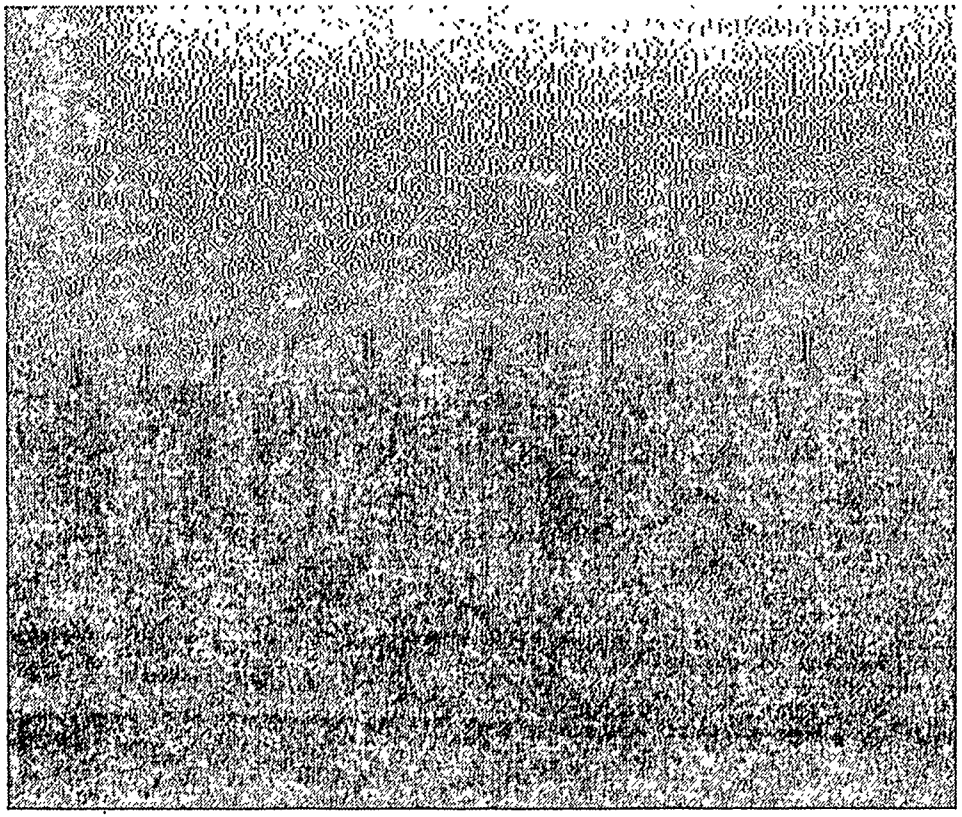
APPENDIX C

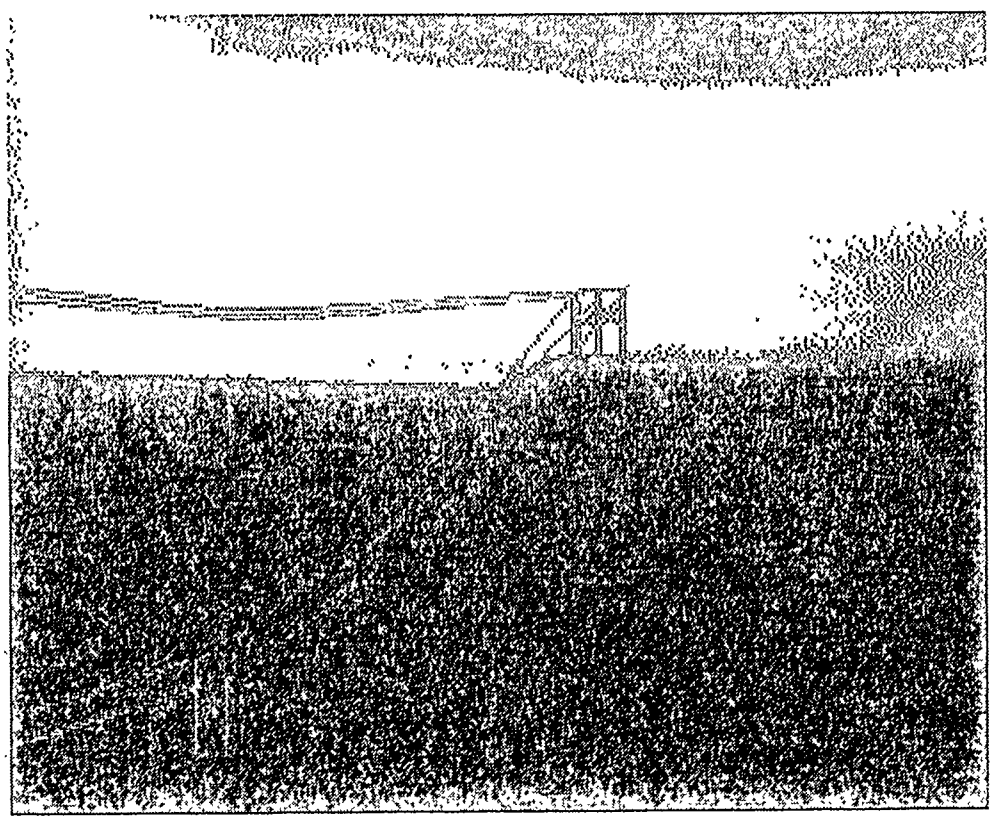


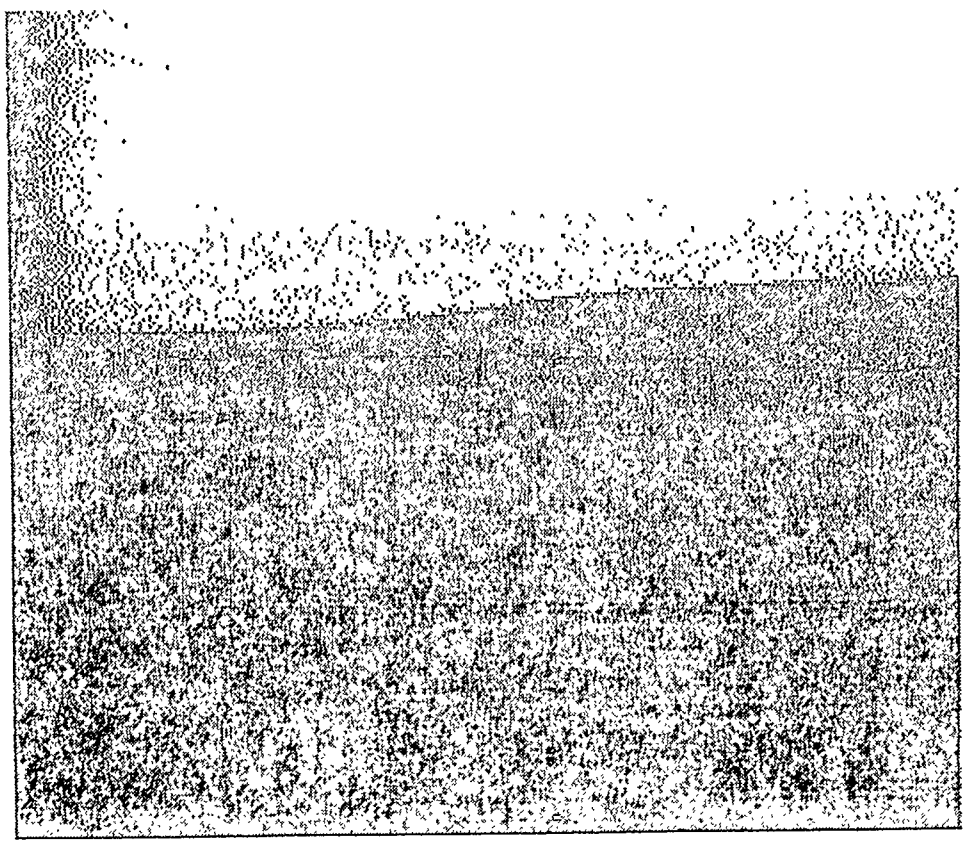












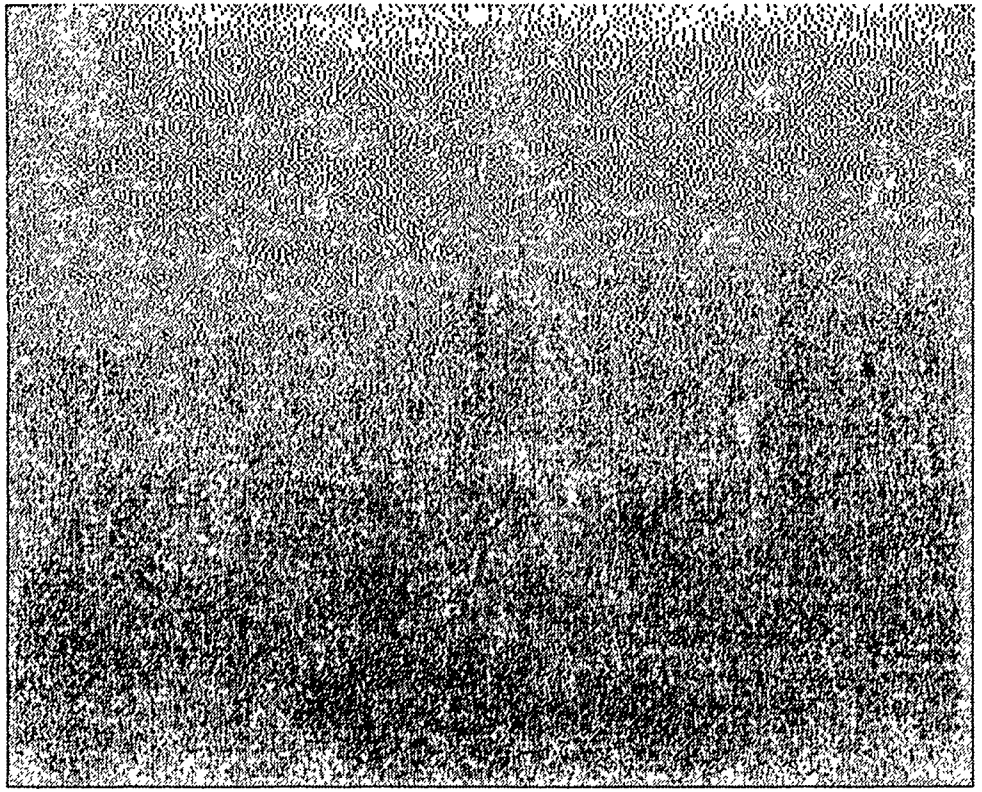


PHOTO LOG

1A: View looking south-southeast from Modoc Plateau on road leaving Devils Garden.

1B: 1A with simulation of proposed power line.

2A: View looking southeast from the Modoc Plateau.

2B: 2A with simulation of proposed power line.

3A: View looking southeast from the Modoc Plateau.

3B: 3A with simulation of proposed power line.

4A: View looking south-southeast from the Modoc Plateau.

4B: 4A with simulation of proposed power line.

5A: View looking east from road coming down from the Modoc Plateau.

5B: 5A with simulation of proposed power line.

6: View of road under power line crossing Rock Creek. Note the ruts where, most likely, someone tried to cross Rock Creek but got stuck.

7: Another view of Rock Creek.

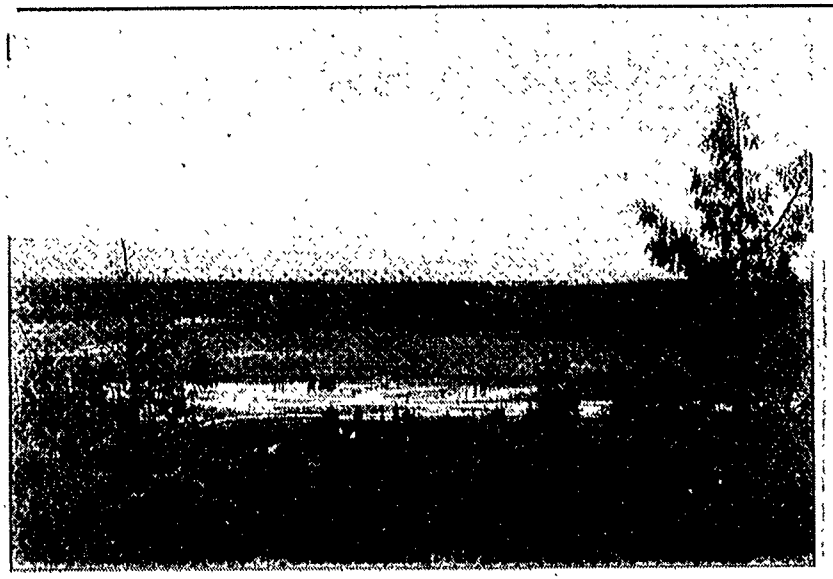
8: View of West Rock Creek.

9: Another view of West Rock Creek.

10: View of road under power line on Devils Garden. Note water running down ruts.

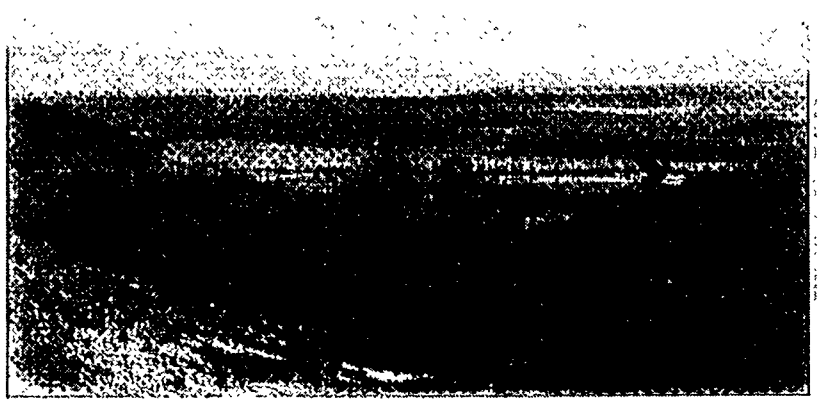
11: Floodplain of Pit River.

Note: Additional photos were taken but have not yet been developed.

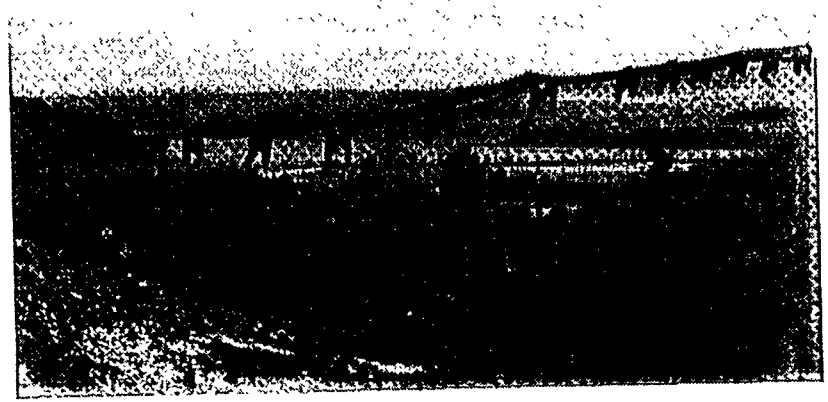


1A

1B

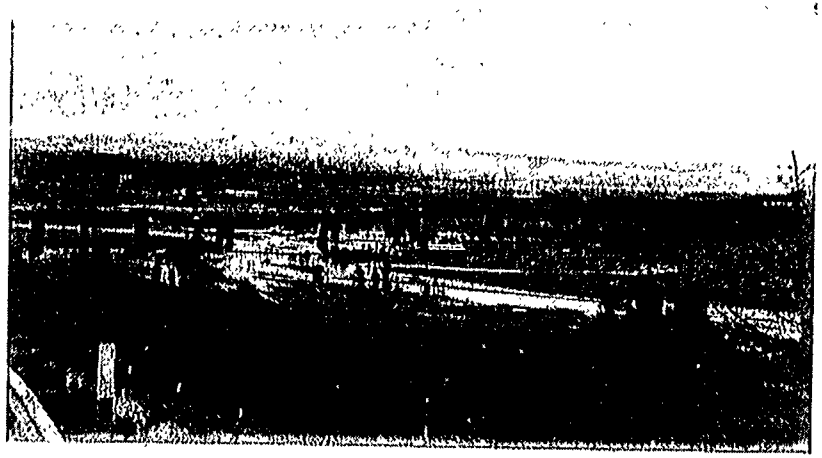


2A



2B

3A

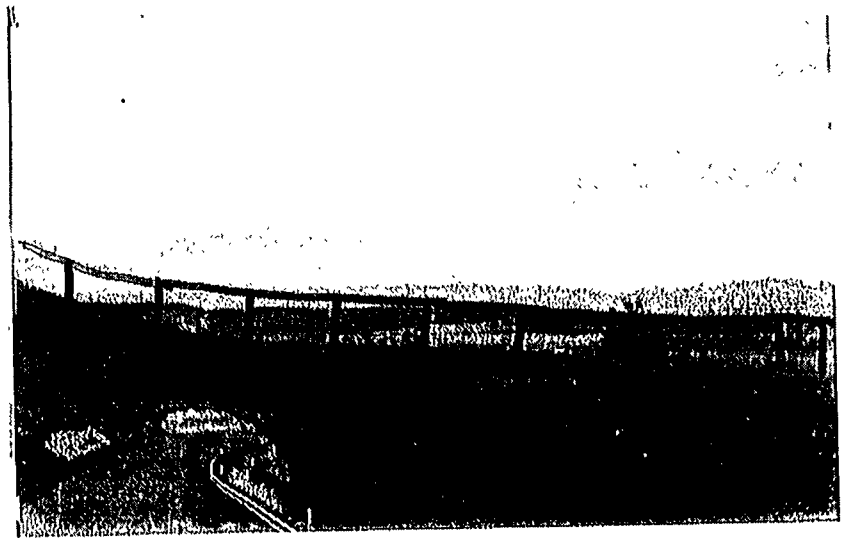


3B

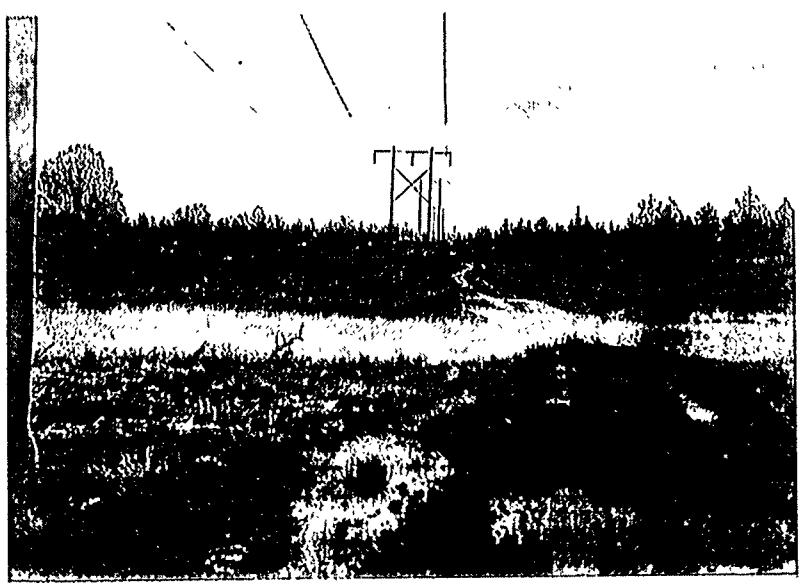
4A

4B

5A



5B



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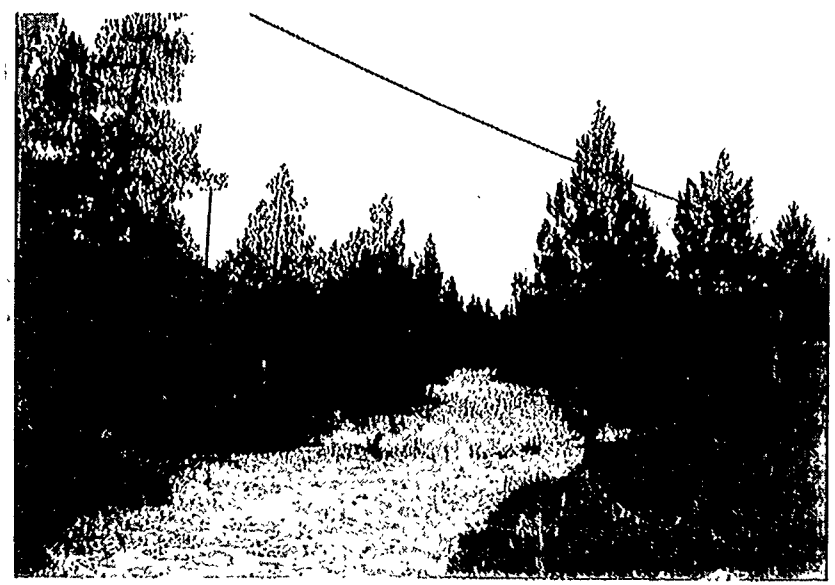

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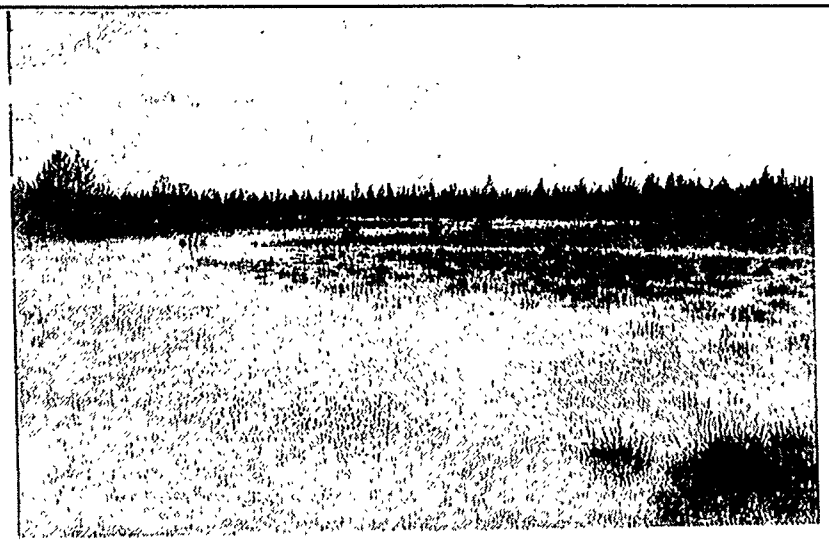

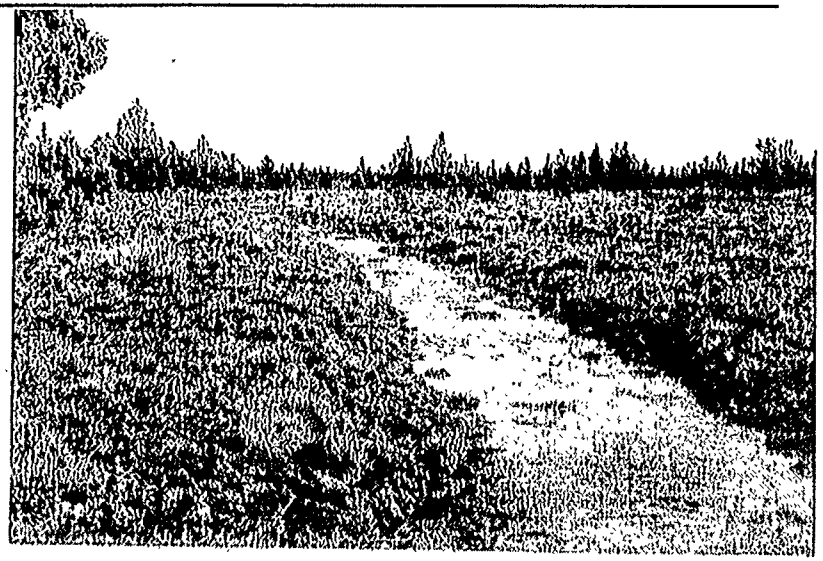

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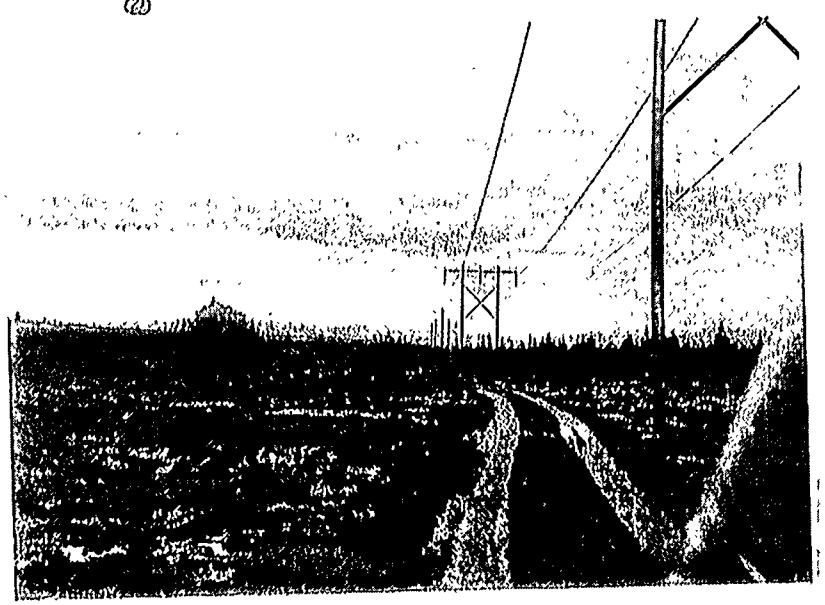

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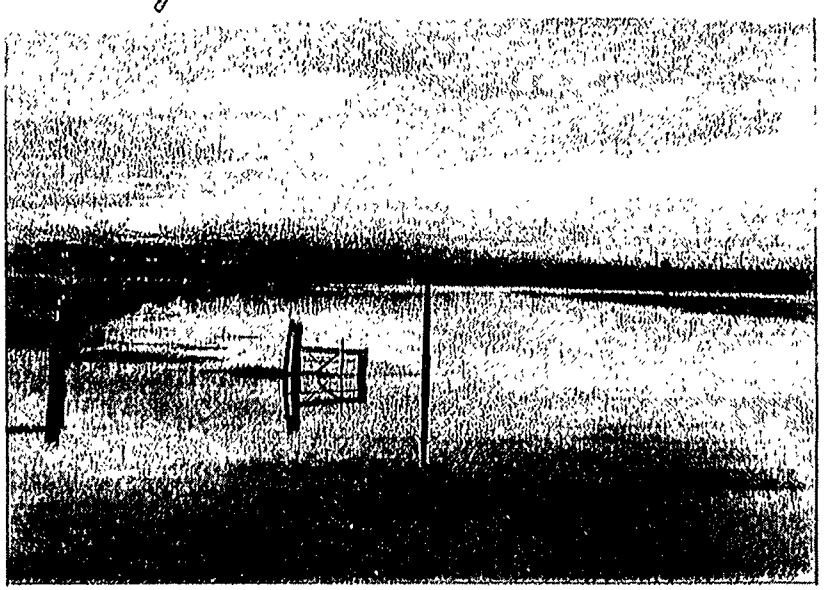


10

11

General Public
Comment Set 136

RECEIVED
JUN 05 1995

To: Julie Halligan/Peter Humm
CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC/93-11-018,
BLM/CACA 31406

Dear Sirs,

The Draft Environmental Impact Study states "the Applicant shall block or conceal new or improved roads through the use of berms or other features". It states that this "would reduce or eliminate the potential for impacts from increased public access to the resources". Please get real here Aspen! This is high desert country-berms will, in no way, even slow down the use of these areas. Take a look at the 235KV BPA line that Sierra Pacific wants to "plug" into-it opened up vast tracts of previously untouched areas.

You better be looking for alot better mitigation that berms if you don't want bladed areas to turn into heavily traveled roads. The best way to not impact our precious, little untouched areas is to just not build the project here at all. The impacts are too severe!!

GP 136-1

Vicki L. Hughes
705 East 5th St.
Alturas, CA. 96101

May 23rd, 1995

RECEIVED JUN 06 1995

Michael E. Dunn
P.O. Box 916
Alturas, CA 96101

General Public
Comment Set 137

May 20, 1995

Julie Halligan/Peter Humm
CPUC/BLM
Aspen Environmental Group
30423 Canwood St., Ste 218
AGoura Hills, CA 91301

RE: ALTURAS INTERTIE
CPUC 93-11-018, BLM CACA 31406

Ms. Halligan and Mr. Humm,

The proposed transmission line will be crossing the Lassen Trail just north of HWY 299 in Modoc County. It also crosses a branch of the Lassen Trail south of the Pit River. The Draft Environmental Impact Report dismisses this as insignificant as Aspen found no evidence of the Trail within the survey corridor.

What about evidence outside of the small 660 foot study corridor? This can most certainly be impacted indirectly by the project. An example of this is the fact that if portions of the trail that may want to be further preserved or landmarked in the future would be visually destroyed by the close proximity of a large power line.

Also, the fact that Aspen could find no evidence of the trail in the narrow study corridor does not mean that the Lassen Trail should no longer be treated for what it is - a historical site. GP 137-1

Michael E. Dunn

GARY & JUNEE FEERO
8275 CHIPPEWA AVENUE * HORIZON HILLS
RENO, NV 89506-9132
702-972-8275

RECEIVED JUN 06 1995

31 May 1995

General Public Comment Set 138

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street Suite 218
Agoura Hills, CA 91301

Ms. Halligan and Mr. Humm:

This letter is to express our opinion that the Alturas Intertie Draft EIS has not addressed a number of areas of damage that are already occurring and will continue to occur.

Washoe County, Nevada residents impacted by the Intertie were left out of scoping and comments, and virtually kept in the dark until after the Drafts in EIS March of 1995. Washoe County, Nevada residents, who number the greatest having close proximity to the Intertie were not given the opportunity to fairly weigh the concerns or benefits. For Washoe County, Nevada residents the plusses do not cover the minuses of this project. The greatest number of directly impacted people, the residents of Washoe County, Nevada should have had the opportunity of speaking to the need of the Intertie before the project even got to the Draft EIS stage. It has been clearly documented that land owners within less than three hundred feet (300') were not notified, while other land owners not as directly affected were invited to scoping meeting. It is clear that a "pick and choose" approach of contacting those impacted was used for notification, which gave unfair weight to the Intertie proponents. This left hundreds of residents out of the comment and scoping process until the eleventh hour. This has caused dissident view to the project an unfair period to consider and comment. GP. 138-1

The damage to property value of our home and all other properties within 5200 feet of the proposed route is imminent. News of this power line has caused the cancellation of pending sales of several homes in my neighborhood. It has also caused a glut of homes to be put on the market in an effort to get those homes sold prior to erection of the poles. The normal percentage of homes on the market in this District is one per cent (1%). With news of the impending power line those listings have jumped to over ten per cent (10%). This power line in its proposed state, is already causing monetary damage which will only increase after erection. Those real dollar damages need to be addressed and mitigated before any impact study can be expected to be true. GP. 138-2

The only plan for Peavine's Toiyabe National Forest property is to maintain natural open space for the enjoyment of the people. The plan has been to maintain natural beauty and preserve it in this state, as well as prevent any damage of that beauty. The power line, if placed on this forest land, goes against all plans to date and is in complete contradictoin of the expectation of use that adjoining land owners had when purchasing this land. GP. 138-3

Along with this power line will come the establishment of a power line corridor. This corridor which would allow for future power lines again is a completely inappropriate usage and will only serve to increase the damages done by the first power line to the natural open spaces. GP. 138-4

This power line will enable Sierra Pacific Power Company to enjoy even larger profits because the cost of power from this line is lower. This cost reduction will in no way be passed on to the consumers, the people who will have had their property values ruined, etc. This will also mean that present power suppliers such as the many geothermal suppliers in this area will take losses which will adversely impact workers and jobs in our area. GP. 138-5

These facts, along with the giving of governmental land to increase the profitability of this one company, SPPCo, is an indecent assault on the majority of this county's as well as this region's people.

The damage to the wide open view of neighboring forest land is tremendous. Nine to thirteen story black/red rusted structures (a color totally unnatural to the surrounding area and vistas) with a base diameter equal to the size of a mid size car or larger is sickening. These pole structures will destroy the view for tens of miles on either side. Add to this point that there are already many existing power corridors, there is absolutely no need to authorize and establish this new one for the Alturas Intercept. No need whatsoever to damage this Peavine, Toiyabe National Forest land and all of us adjoining land owners and users who appreciate the open space designation and what it means to our families and community. GP. 138-6

To close, the action of accepting this routing will heap large profit on SPPCo, while causing monetary and aesthetic degradation on those who can least afford it. Please consider us, the community and people who will be forever damaged by this unnecessary power line and corridor, when reviewing the permanent damage and impact this will leave us. For Washoe County, Nevada residents this process needs to return to the point of scoping with the Addendum to Draft EIS that covers the entire community opinion on needs of the Intertie. The Draft EIS needs to be put on hold until such is accomplished or it continues to give unfair advantage to the proponents who stand to profit monetarily from that advantage.

Very Truly Yours,

Gary Feero + Junee Feero

Gary and Junee Feero

RECEIVED JUN 06 1995

ERIC ROVE
POST OFFICE BOX 9005 UNIVERSITY STATION
RENO, NEVADA 89507

General Public Comment Set 139

DEAR SIRS

I am writing to object fully to the proposed Alturas Transmisson line. My objections are first aesthetic in that I have lived at the base of Peavine Renting for 25 years the same house simply because of this mountain with its great winds and clouds. Secondly the line seems to be purely for profit in supplying the gold mines in eastern Nevada I just ran out of lead in my pencil well

GP 139-1

Thank you

E. Rove

① OF ①

RECEIVED JUN 06 1995

General Public
Comment Set 140

6-1-95

ATTN: JULIE HALLIGAN/PETER HUMM

MY NAME IS KARL BEAHM AND I AM A RESIDENT AT 11050 DUFFENDY LANE, RENO, NEVADA 89506, LOCATED IN ANDERSON ACRES JUST EAST OF THE RAILROAD TRACKS THE PROPOSED SIERRA PACIFIC 345,000 VOLT OVERHEAD TRANSMISSION LINE WILL PARALLEL IN THE EVENT OF APPROVAL.

GP. 140-1

THIS PROPOSED LINE WILL DESTROY THE SCENIC WONDER OF PEAVINE MOUNTAIN, THE RECREATIONAL VALUE FOR OURSELVES AND THE CHILDREN, AND PLUMMET PROPERTY VALUES.

I LIVE WITH JOHN LUNDEMO AND HIS TWO CHILDREN. JOHN HAS BEEN THE PROPERTY OWNER FOR 12 YEARS, STARTING HIS DREAM IN A SMALL OLD HOUSE AND BUILDING INTO A HUGE HOUSE AND A LARGE STUDIO BUILDING NEXT TO THE RAILROAD TRACKS.

JOHN, MY SELF AND HIS CHILDREN ARE SCARED BY THE CLOSENESS OF

② OF ②

GP. 140-1

GP. 140-2

THESE LINES AND THE DANGER OF ELECTROMAGNETIC FIELDS THAT MANY STUDIES WARN OF EXPOSURE.

WHAT DOES A HOMEOWNER DO? GIVE UP HIS DREAM, NOW FULFILLED AND FORFEIT THE INHERITANCE OF HIS CHILDREN. WHAT DOES A RENTER DO? MOVE WHILE A SCENIC VISTA IS DESTROYED?

NAWM WAS SUPPOSED TO HELP, PINION PINE SOLVE PROBLEMS FOR THIRTY YEARS! NOW WE ARE TOLD WE NEED MORE POWER WHEN IN FACT IT APPEARS INTERLOCKING WITH A "GRID" AND FUTURE "WHEELING" IS THE UNDERLYING REASON.

PEOPLE IN NEVADA, FROM OUR BORDER-TOWN/LONG VALLEY NEIGHBORS, ALL ALONG THE ROUTE INTO TOWN ARE ALL OPPOSED. THE BATTLE HAS JUST BEGUN ALTHOUGH WE STARTED LATE DUE TO LACK OF NOTICE BY SIERRA PACIFIC. PLEASE CONSIDER: PEAVINE, ITS BEAUTY AND HISTORY AND THE INVESTMENTS OF HOMEOWNERS AFTER THEIR DREAMS.

Karl H. Beahm

RECEIVED JUN 06 1995

6-1-95

ATTN. JULIE HALLIGAN / PETER HUMM

ENCLOSED IS A COPY OF THE FLYER HANDED OUT TO OVER 200 RESIDENTS OF BORDERTOWN, ANDERSON ACRES, COLD SPRINGS AND THE COMMUNITIES TO BE AFFECTED BY THE PROPOSED 345,000 SIERRA PACIFIC ALTURA LINE.

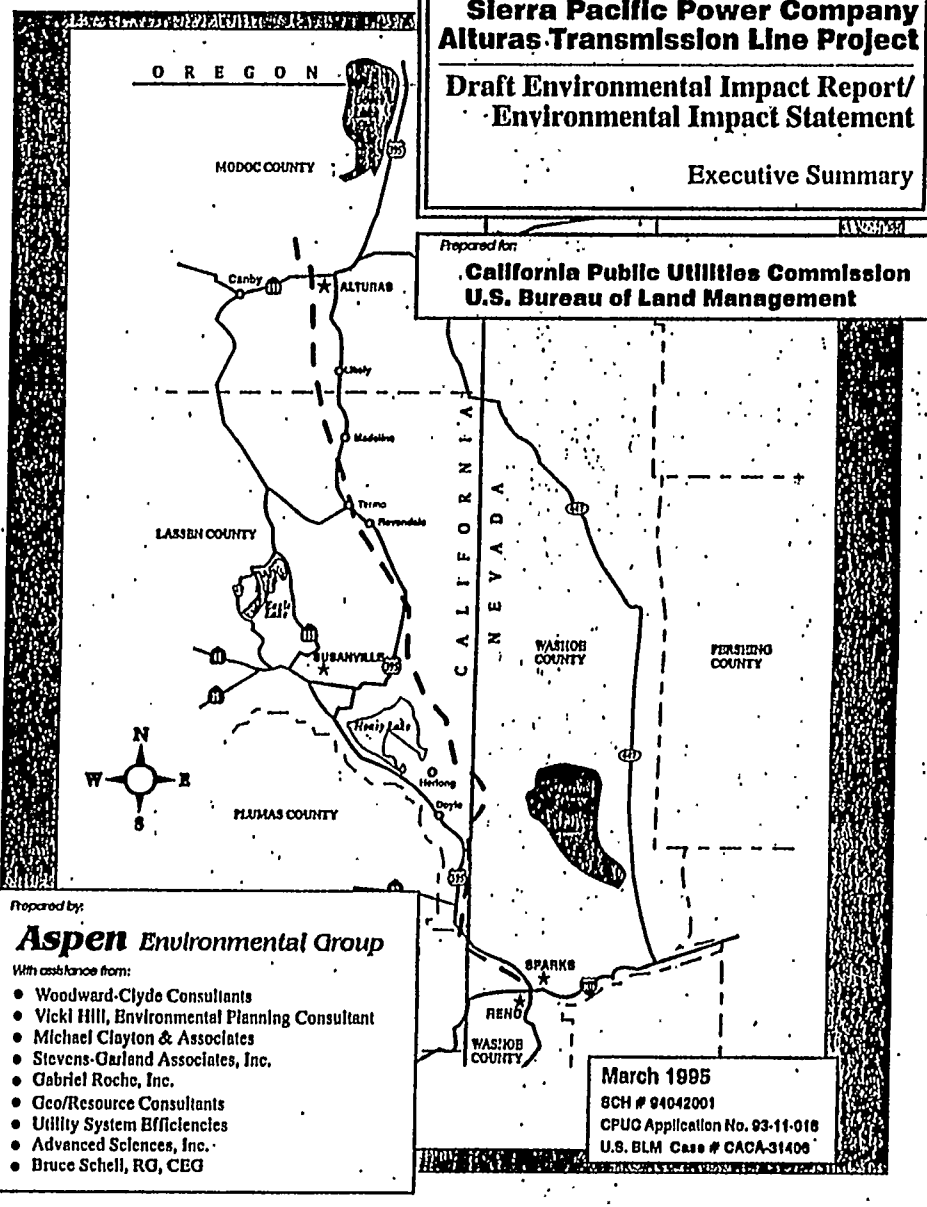
GP. 140-3

WE ASK YOU TO CONSIDER THIS A PROTEST LETTER AND FURTHER ASK YOU INCLUDE IT IN THE FINAL CALIFORNIA E.I.R.S.

THE FLYER WAS RECEIVED WITH 100% OF OUR POPULACE DISGUSTED AND AGAINST THE ALTURAS PROPOSAL.

THANK YOU

KARL BEAHM
11050 DUFFNEY LANE
RENO, NV. 89506
ANDERSON ACRES
(702) 972-6369



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JUN - 2 1995

General Public Comment Set 141

JOHN WILLIAMS 12770 SW FOOTHILL DR.
PORTLAND, ORE 97225 503-626-5736, 503-641-2093
JUNE 2, 1995

BY FAX TO JULIE HALLIGAN/PETER HUMM/ASPEN ENVIRONMENTAL GROUP

Dear Ms. Halligan and Mr. Humm:

I am a consultant to Plumbers and Steamfitters Local #342, which has many skilled construction trades members who live and work and find recreational enjoyment in and near the vicinity of the proposed Alturas Transmission Line Project.

Here are comments on the Draft EIR/S for this proposed action. The project route will parallel closely the proposed Tuscarora natural gas pipeline. Indeed, for at least 37 miles the two projects apparently will be constructed in virtually the same corridor/right of way (ROW).

It is questionable whether the preparation of two separate EIR/Ses, one for the pipeline, and one for the transmission line, satisfies either the California Environmental Quality Act (CEQA) or the National Environmental Policy Act (NEPA).

To a degree, the two separate appraisals of these two physically close projects tends to interfere with the comprehensive evaluation of the possible cumulative impacts. This is troubling since the impacts from each project, by itself, are significant. Combined, the impacts of the pipeline and the transmission line are doubly significant and degrade the same areas of wildlife and avian habitat and aquatic resources, including but not limited to wetlands and essential ranges. GP. 141-1

I am attaching comments drawn largely from my review of the Tuscarora Pipeline, which would be in the same vicinity as the transmission line and which may affect essentially the same natural resources.

Yours, John Williams
12770 SW Foothill Dr.
Portland, OR 97225
(503-626-5736, fax-503-641-2093)

06-02-95 01:44PM (503) 641

PAGE 1

INADEQUATE MITIGATION OF LOSS OF HABITAT

This development will convert areas of existing and potential agricultural and wildlife habitat uses into an industrialized zone. There will be potentially significant, adverse, losses of many unique forms of wildlife and aquatic habitat, including but not limited to harms to wetlands, vernal pools, winter range, and supporting acreage for the habitat of several species of deer, antelope, grouse and other avian species, as well as unmitigated removals of agricultural lands.

While substitute habitat may be acquired or developed as mitigation, the EIR/EIS lacks sufficient documentation to assure commenters that the substitute acreage will adequately mitigate the losses from the project. Replacement habitat may be of lower quality than the destroyed habitat.

The failure of the EIR/EIS to specifically identify the alternative habitat areas to be restored, and to describe the restoration measures to be taken on those substitute lands may fail to satisfy the CEQA elements which require specific descriptions of mitigation measures.

LOST HABITAT

This project may cause losses of many different forms of land and aquatic habitat. The clearing of roads and Right-of-Way (ROW) may remove/alter potential terrestrial and aquatic wildlife and plant habitat.

This may include destruction of aquatic habitat, including jurisdictional wetlands, and additional losses of springs, seeps, and ephemeral pools.

Relatively high quality winter range for deer and antelope (701.38 acres), portions of which may also serve as grouse habitat, could be affected by the project. GP. 141-2

Any losses of deer/antelope will be highly adverse on recreational activities. All deer and antelope tags are heavily oversubscribed in northeastern California, but it is unclear what types of mitigation are suggested for losses of recreational opportunities.

It is also possible that far more than the immediate area of the ROW will be rendered unusable for deer/antelope/grouse. This is because there will be sporadic human activity along the route, such as repair and survey crews and overflights.

MORE SUBSTANTIAL MITIGATION OFFERED FOR OTHER PROJECTS

Many energy-related developments offer substantial mitigation in recompense for the degrading of habitat. Here are GP. 141-3

06-02-95 01:44PM (503) 641

PAGE 2

some examples that may suggest appropriate mitigation funding by the developer of this project.

The City of Tacoma has offered to acquire, maintain and improve 14,000 acres of replacement habitat, to mitigate the harms to natural resources from one of its hydroelectric projects.[1]

Also, the Snohomish Public Utilities District has spent $2 million recently to construct recreational facilities as partial mitigation for an energy generating facility.[2]

Generally, in the case of wetlands, developers usually offer to provide 1.5 or 2 acres of replacement or restored habitat. This is a tacit acknowledgement that replacement habitat is invariably less productive than natural habitat.

This EIR/EIS apparently does not identify the proposed replacement habitat, or describe reclamation thresholds for that replacement land. The EIR/EIS also lacks a comprehensive demonstration or a guarantee, as required under CEQA, that the replacement habitat will be equal in quality to the destroyed habitat.

GP. 141-3

A failure to conclusively demonstrate that the replacement habitat is as valuable as the destroyed habitat, is important because deer/antelope/grouse range will also be lost to the nearby Tuscarora pipeline project.

Any low sagebrush shrublands losses are very significant. Low sagebrush is a vital element of the antelope and grouse habitat, and its unique geotechnical structure and clay durapan substructure cannot easily be reconstructed by reclamation.[3]

It is likely, then, that the restored habitat, whose restoration will be funded by the developer, will be of far less value than the destroyed low sagebrush habitat.

This developer should be obligated to provide 1.5 to 2 acres of replacement habitat for every acre of deer/antelope low sagebrush wintering grounds lost.

In addition, the EIR/EIS may not discuss several recent developments in the vicinity of the proposed project, which have also had adverse impacts on the deer/antelope/grouse habitat. These recent developments include but are not limited to the large hydroelectric project in Huck Valley on the Pit River, the Honey Lake hog fuel/geothermal power plant project, and the AMAX Hayden Hill Mine.

06-02-95 01:45PM (40) H3

PAGE 3

FUNDING BY THE DEVELOPER AS A MITIGATION MEASURE

One method of mitigating the harms from this project, is to require the developer to fund restoration of other areas of potential habitat. Substantial sums should be required. Reclamation of severely degraded lands, such as former roads or mined lands, can cost in excess of $2000/acre.[4]

Even simple scarification and revegetation in previously cleared areas, with favorable weather, can cost several hundred dollars/acre for the first effort at replanting. If the first planting does not take, successive plantings can increase the reclamation costs.[5]

GP. 141-4

Much of the habitat to be restored by the mitigation fund may be in areas with low rainfall, and large sums may be needed to improve these areas. Given these potentially adverse conditions, more than one planting and ground preparation may be necessary. Restoration of low sagebrush habitat is problematic.

For instance, costs will rise if soils in the area to be restored are compacted and will need aeration, and if the soils to be reclaimed are low in nitrogen and mulch, if the area is subject to erosion, and if the replanted vegetation will have a high initial die-off from unfavorable weather in the first year or two of reclamation efforts.

PROJECT ALTERNATIVE

Additional setting aside of replacement habitat, at a ratio of 1.5 or 2 acres of replacement range for every acre lost, and a large mitigation fund, to include both maintenance costs for the replacement lands, and additional monies for improving degraded range, is suggested.

GP. 141-5

AQUATIC HABITAT LOSSES ARE NOT MITIGATED SUFFICIENTLY

The proposed development, as part of its adverse impacts, may include destruction of wetlands and aquatic habitat. There is not adequate evidence available to establish that there will not be a significant adverse impact.

The project may obliterate wetlands that are considered rare, very valuable and of high-quality. Wetlands perform many important functions, including removal of sediments, inorganic nutrients, and organic toxicants from water flowing across wetlands.

GP. 141-6

Presence of wetlands results in decreased surface water concentrations of inorganic suspended solids, fecal coliform, nitrates, ammonium, total phosphorous, and lead. If existing wetlands are reduced in size, then these contaminants may enter surface waters.

06-02-95 01:45PM (40) H4

PAGE 4

Small streams and seasonal water bodies that are in integral contact with adjacent wetlands are dependant on wetlands for protection from siltation, toxic chemicals, low summary stream flows, extreme temperatures, and flood flow attenuation. [6]

The developer may be proposing to destroy already-functioning, high quality, rare wetlands, some of which may be in headwaters areas, and mitigate this loss with unstated mitigation to wetlands of unknown quality.

Many studies have found that restored or reconstructed wetlands do not provide many of the functions of naturally occurring wetlands. One study found that even after 5 years, a constructed wetland was less than 60% functionally equivalent to a natural wetland.[7]

GP. 141-6

LOSSES OF VERNAL WATERS

The project may consume areas in the vicinity of vernal pools and vernal mudflat, both through construction activity and any later spraying of herbicides to keep the ROW clear. Vernal pools in California once occupied over 500,000 acres; now over 90% of that number have been destroyed by development. [8]

These vernal pools are now very rare, and their unique soil and hydrology conditions and regimen support several rare plant and aquatic species, including but not limited to the tadpole and fairy shrimp which are proposed for listing as federally endangered. Vernal swales and clayflat wetlands may also be harmed by this project. These types of wetlands also provide similarly unique habitats, although these wetlands are of less value than vernal pools.

It is not apparent that several special-status plants was surveyed for in the vernal waters areas, including Legenere Limosa, Hoover's spurge, Red Bluff rush, Slender and Sacramento Orcutt grass, and Greene's tuctoria. These species are potentially found in vernal waters in northeastern California.

GP. 141-7

SUGGESTED PROJECT ALTERNATIVE

The project should be rerouted away from any vernal pools/swales/ephemeral pools sharing vernal pool characteristics, and away from Boggs Lake hedge-hyssop populations.

It may be appropriate to require greater than 1:1 replacement of wetlands degraded by the project, with additional wetlands acquired and protected as part of the project's mitigation.

GP. 141-8

IMPORTANCE OF SEASONAL WATER BODIES

The project may adversely affect many seasonal and

GP. 141-9

06-02-95 01:59PM [42] MI

PAGE 5

intermittent water bodies. But these special habitats, including meadows, outcrops bluffs, marshes and bogs, vernal pools, playas, and ephemeral streams, support many unique plant and animal species. In many situations these species may be adversely affected by the proposed development, because highly specific site characteristics such as peculiar soils, are required for their survival.

Surface waters, including but not limited to playa lakes, vernal pools, and other seasonal water bodies that are close to wetlands provide extremely beneficial functions.

Small and seasonal steams and water bodies can be significant biologically for insect and vegetation production, fish spawning, and rearing, etc. This has important biological implications.

For purposes of determining the size of lost habitat that should be mitigated, a buffer zone of up to 600 feet near certain water bodies should be established.

This large buffer area near water bodies has been suggested in other studies of developments on public lands. The project's encroachment within the more stringent buffer zones suggested in other studies should be used to determine appropriate mitigation through the developer acquiring and dedicating and restoring other riparian sites. [9]

HERBICIDE USE

This large buffer area will be especially important, if the developer uses herbicides on the ROW. Up to 80% of herbicides may drift off-site, potentially affecting nearby water bodies. The EIR/EIS should have described the amounts and types of herbicides to be used, and the methods and frequency of application.

SUMMARY

The developer should provide a 2:1 replacement ratio of acreage for damaged wetlands and surface water bodies, and complete avoidance of vernal wetlands.

SOCIO-ECONOMICS

Imported construction workers may bring many spouses and children with them, creating additional demands on the socio services (housing, health care, schools, traffic, police) of the affected areas. Each additional child in local schools could cost school districts about $5000/child.

There are many currently studies on socio-economic impacts that suggest that this socio-economic impact could be expected;

06-02-95 01:46PM [40] MI

PAGE 6

50% of out of area workers will bring their families, which will average one spouse and two children. This impact will be magnified by the possible concurrent arrival of an imported construction work force for the Tuscarora Pipeline. GP. 141-12

PROJECT ALTERNATIVE

The project owner should be required to make direct cash mitigation payments to the local schools and health care providers, to enable those facilities to increase their staffs in preparation for the arrival of the project work force. GP. 141-13

SAFETY

The project will be very close to the proposed Tuscarora natural gas pipeline. The EIR/EIS for that pipeline presented statistics which show the possibility of 1.3 "service incidents" per year per 1000 miles of pipeline.

A service incident, in the EIR/EIS, is apparently the same as a reportable incident. An incident is reportable if there is a gas leak causing a death or serious injury, gas ignition, over $5000 in property damage, if it occurred during test, if it required immediate repair, or if a portion of the line was taken out of service because of the incident.

Since the Tuscarora pipeline (and related laterals) is approximately 250 miles long, then about .33 service incidents per year may be expected. Over a fifty-year period, about 17 service incidents may occur. [10] GP. 141-14

The EIR/EIS for this transmission line should describe the likely scenario of these seventeen service incidents, perhaps by describing several recent service incidents at similar pipelines.

Descriptions of a range of several recent incidents should be provided in the EIR/EIS, so that readers and commenters can be apprised of the possible impacts of service incidents. This is appropriate because, as cited above, almost 17 service incidents can be expected over a 50 year life span for this pipeline.

The reason we are concerned that the EIR/S for the transmission line evaluate the ramifications of gas pipeline accidents, is that a pipeline accident that caused a fire/explosion would potentially interrupt transmission line service, by damaging/destroying the transmission line. This possibility deserved comprehensive evaluation in the DEIR/S.

The failure of the lead agencies to evaluate the pipeline and transmission line in a single environmental document is in part responsible for the lack of a detailed description of the dangers inherent in running a gas pipeline and a transmission

06-02-95 01:59PM [42] H2

PAGE 7

part responsible for the lack of a detailed description of the dangers inherent in running a gas pipeline and a transmission line in close proximity. GP. 141-14

WILLIAMSON ACT WITHDRAWALS

It is unclear if the project involves cancellation of Williamson Act contracts, which would be a significant impact under CEQA. GP. 141-15

INADEQUATE DISCUSSION OF CUMULATIVE IMPACTS

The EIR/EIS failed to discuss the possibility that the project construction activity may over lap with current pipeline construction, and possible construction in the near future, of the Tenaska and Mitsubishi power plants, all in the Klamath Falls area of Oregon, with geothermal exploration and drilling in/near the Modoc National Forest, or with power plant construction in Tracy, Nevada. GP. 141-16

The cumulative socio-economic impacts of these projects, with the proposed project, should have been discussed in the DEIS/DEIR.

AIR QUALITY

This project will have significant air quality impacts, including additional emissions of PM-10 and other pollutants within air basins that are in non-attainment for these pollutants. Since a federal agency (US BLM) is involved, there should be a separate public comment period on whether this project is in compliance with the State Implementation Plans (SIPs) for both California and Nevada, as required under 40 CFR 6, 51 , and 93, referenced in Vol. 58, No. 228 FR, 11/30/93, pp 63214 et al. Please notify me of this public comment period. GP. 141-17

ADDITIONAL CONCERNS

Please describe the amounts and types of top soil tackifiers, dust control chemicals, and soil binders to be used on this project. GP. 141-18

The project equipment may be periodically washed. What is the source of this wash water? How will deposition of washed-off materials, such as oil, grease and other unsavory materials be handled and prevented from entering soils and waters?

06-02-95 01:47PM [40] H7

ENDNOTES

1. Federal Register, Vol. 60, No. 4, 1/6/95, p. 2099.

2. FERC Order issued 12/5/94, for Project 2157-058, captioned 69 FERC 62188.

3. Hayden Hill FEIR/EIS, California Fish & Game Comment letter.

4. See, for instance, the 1991 EIR/EIS by Lassen County and BLM for the AMAX Hayden Hill Mine, which required a bond of over $2000/acre for reclamation of that facility.

5. Please see Oregon DOGAMI correspondence on road reclamation costs, Atlas Mine. Replanting costs from personal communication with Dave McClain, California Energy, 11/94.

6. (Mitsch and Grosselink, 1986, Johnson et al, 1990, Reinelt, et al, 1990, Robb, 1992 Ecological Engineering, 1992, all cited in Forest Ecosystem Management. Report of the Forest Ecosystem Management Assessment Team, 1993)

7. (Zedler & Langis, 1990, cited in Natural Resource Damages. Ward & Duffield, Wily & Sons, 1992)

8. (Holland, 1978)

9. Forest Ecosystem Management: An Ecological Economic and Social Assessment. Report of the Forest Ecosystem Management Assessment Team. July, 1993. USFS, NMFS, BLM, F&WS, NPS, and EPA. See pages V-32 to V-46, for instance, regarding dedication of buffer zones in/near riparian areas.

10. Since the length of the Tuscarora pipeline is 1/4 the 1000 mile criteria used in the incident equation, I have divided the 1.3 incidents/1000 miles by 1/4th.

RECEIVED JUN 07 1995

General Public Comment Set 142

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: NICK CHORAK & VIRGINIA CHORAK
Affiliation: PROPERTY OWNERS
Address: P.O. BOX 1929
City: FREMONT State: CALIF. ZIP: 94538
Phone: (510) 657-0920 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

Judi Hallijan - Peter Hemm

I am very much opposed to the Alturas Transmission line running south through Honey Lake valley. I own land south East of Wendel in Honey Lake Valley.

GP. 142-1 That is one of the few uncluttered valleys in California. For one thing it would decrease the property values. Most of that valley in time, will be developed and cultivated for farming.

345 thousand kilowatts is dangerous, not only for people, but also for animals and birds. At any given time you can drive into that valley and see Badgers, fox, coyote, wild horses and deer, hawks and antelope. You see Bald Eagles and Hawks. That also is the route for duck and geese as we see they fly south, and these birds could be killed by flying into these lines. Therefore putting the line through this valley would be just like running it through your home room. We have no electricity in the valley and also find out that we still won't have any after they run the line through there.

GP. 142-2 The only benefit I can see from this line is the State of Nevada. Instead of cluttering up our beautiful valley this line should run through the State of Nevada.

Again I ~~state~~ voice my opposition to this line going through Honey Lake Valley.

Respectfully

Nick and Virginia Chorak

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED JUN 08 1995

April 23, 1995

General Public Comment Set 143

My name is Nancy Finley, and I own a forty acre parcel of land in the Secret Valley Ranch #2.

The Sierra Pacific Power Company has surveyed and applied to the California Public Utilities Commission to build an electrical power transmission line which if constructed as originally planned will cross my parcel of land.

This power will be carried by lines mounted on 130 feet tall twin steel towers spaced up to 1,000 feet apart.

If built as originally proposed, these lines will be constructed very near my homesite. I have drilled a well, and installed a septic system, and have had excavation work done on this homesite. Building plans are in the final stages of preparation.

I have four married children and nine grandchildren. I work as a private nurse, and it has taken me three years to complete what I have done on my property because of the enormous expense involved.

GP. 143-1 In addition to my obvious objections to this project, i.e. electromagnetic fields endangering myself and children and grandchildren and friends and, interruption of a beautiful panoramic view, the towers and lines being a danger to ducks and geese landing in proposed ponds on my property, electromagnetic fields also endangering birds and animals and plants and trees, possible disruption of a native american chipping ground and possible burial sites....I am very concerned about possible increased risk of fire. I am sure you are aware of the danger of fire in this area, and the weather patterns. The lightening storms throughout the year are awesome!! The proposed route will run these lines directly along the east side of highway 395 from north of the rest stop south past Secret Valley Ranch #2. The wind almost always blows from the West. If lightening struck a tower or line and caused a grass fire, my home as well as any other homes in the area would be in grave danger of being destroyed.

GP. 143-2 Currently, as far as I know, I am the only homeowner in Secret Valley Ranch Subdivision #2 who has immediate plans to begin construction on my primary residence. However, I have talked with a few of you owners in our subdivision, and you have told me you plan to build here in the future. If these huge towers and lines are allowed to be built along the originally planned route, they will be here for decades....

GP. 143-3 There is an alternate route proposed, the SECRET VALLEY ALTERNATIVE ROUTE, but all of the environmental studies are not yet complete. This route would be approximately 1-1/2 to 2 miles east of highway 395, making it run along BLM lands to the east of Secret Valley Ranch Subdivision #2. In the event of lightening knocking down lines, with the wind normally blowing from the West, the risk of fire damaging our property and homes will be markedly reduced.

2

GP. 143-3

I spoke with Mr. Pete Hume with the BLM, and he told me that the BLM is very much in favor of this SECRET VALLEY ALTERNATIVE ROUTE. He said the BLM was concerned about the view of these towers along highway 395.

The reason I am contacting you is to ask you to help me convince the Sierra Pacific Power Company, the BLM, and the Public Utilities Commission that the SECRET VALLEY ALTERNATIVE ROUTE should be used in order to protect life and property. I have taken the liberty of enclosing a letter addressed to each of these groups which I hope you will sign and mail to them. I have also enclosed copies of some of the information I have received concerning this project. I am not sending the complete Environmental Impact Report because it weighs about seven pounds! If you have any questions or need any further information that I may be able to supply you please feel free to call me. You will reach my voicemail because I only have a cellular phone, but I check my messages daily. I will call you back as soon as possible, and do anything I can to help you with your decision of whether or not to help me protect our investments in Secret Valley Ranch Subdivision #2.

I have been told by Sierra Pacific Power Company that I would be paid for the right-of-way through my land, and I have told them I do not want their money. I love my land, all of the wildlife, birds, plants and trees. So do my family and friends. I just want to live in peace on the land without having to look at or worry about the dangers these towers and lines will bring.

I am sending each owner 5 copies of the letter I need you to sign and send. 1 copy to Sierra Pacific Power Company, 1 copy to the Public Utilities Commission, 1 copy to the BLM, 1 copy to me for my files, and a copy for your files. I have also enclosed stamped and addressed envelopes for your convenience.

I have just recently found out about this SECRET VALLEY ALTERNATIVE ROUTE, in my over one year long battle to keep these dangerous and ugly towers off my land. Time is very short and it is of the utmost urgency that if you agree with me, you sign and send these letters immediately. You are also welcome to write your own letter to any of these agencies. If you do write your own letter, and you feel comfortable with sending me a copy of the letter for my files, I would appreciate it very much. The letters must be postmarked no later than May 3, 1995 !!

Thank You in advance for helping me with this. I hope to meet more of you in the future. Until then, If there is anything I can do to help you please do not hesitate to ask me. I truly hope you are enjoying a happy and peaceful life.

Regards,

Nancy Finley

Nancy Finley,
Hawkeye Ranch
P.O. Box 70
Litchfield, Ca 96117
(916)251-1677

CC: CPUC
BLM
SPPC

May 31, 1995 RECEIVED JUN 0 d 1995

MR. PETER F. HUMM

Gentlemen:

My name is Nancy Finley, and I own a forty acre parcel of land in the Secret Valley Ranch Subdivision #2.

I would like to first state that I urgently request that the Secret Valley Alternate Route be the route selected by your office as the installation route for the supply power lines being installed by Sierra Pacific Power Company.

I have contacted other owners in the Secret Valley Ranch Subdivision #2 and have letters of support from owners representing over 750 acres of privately owned land, which represents most of the privately owned land that exists in between the originally proposed route along the East side of Highway 395 and the Secret Valley Alternate Route. I have enclosed copies of my copies of letters that these other owners have forwarded to your offices.

As your records will reflect, when the initial studies for the Sierra Pacific Transmission Lines Project were begun, I was not notified as the current owner of the land. Old records were used, and the initial permit to do these studies on my land was signed by the man I purchased my property from. He owns several other parcels in the immediate area, and my copy of his request for the Secret Valley Alternate Route is enclosed. Companies doing the initial studies could only see a storage shed and travel trailer on my property. However, at the onset of these initial studies, I had in place a well and septic system in preparation to build my home. I also have completed major excavations for my homesite. I have to date spent over $15,000.00 in these preparations for my home. I cannot move my homesite without abandoning all of these improvements and starting over on what is to me an unacceptable homesite, and I would not have the full enjoyment of my property or the views which I now anticipate at the current homesite.

Monies offered by Sierra Pacific Power Company is of absolutely no value here because I DO NOT WANT ANY MONEY from Sierra Pacific Power Company for a right-of-way across my land. I want Sierra Pacific Power Company to use the Secret Valley Alternate Route, thereby not crossing any of my land, and I simply do not want to be forced to live in such a close proximity to these lines, have them ruin my views, or live in constant fear of lightening striking a line or pole and causing a fire that would wipe out my entire investment and endanger my and my families' and friends' lives. I also feel that the lines and huge towers running along highway 395 will decrease my property value in the future. Considering what I paid for my property and the current selling prices, my property has increased in value by 25% in the last three years. I plan to live here for the rest of my life, but the value and marketability of my property is of major concern to me for the benefit of my heirs.

My house plans are on file with the Lassen County Building Department for review and approval. Upon approval of the house plans, I will have spent over $4,000.00 for the plans and required building permits.

In the event the Secret Valley Alternate Route is not adopted as the route to be used, I fully intend to initiate litigation. I prefer to settle this in a logical manner, and what could be more logical than using the

Secret Valley Alternate Route? This would alleviate my and my neighbors' fears of fire from downed lines, loss of property value because of these huge towers and lines running along the highway, and well documented dangers to humán and animal life from the electromagnetic field surrounding these lines.

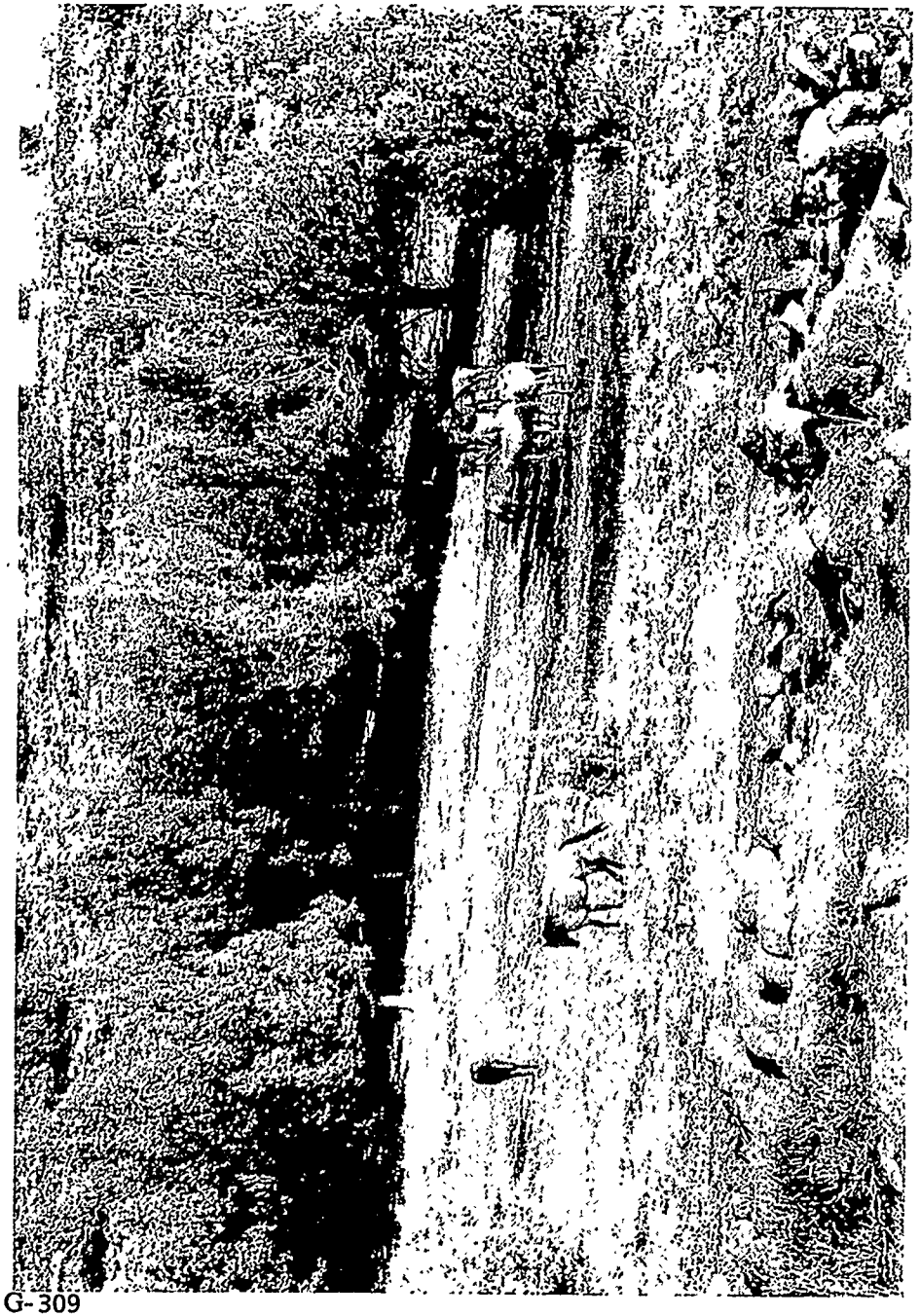
I respectfully request that you listen to the voices of the private land owners who will be directly affected by your decisions. The Secret Valley Alternate Route appears to affect owners in the Secret Valley Ranch Subdivisions.

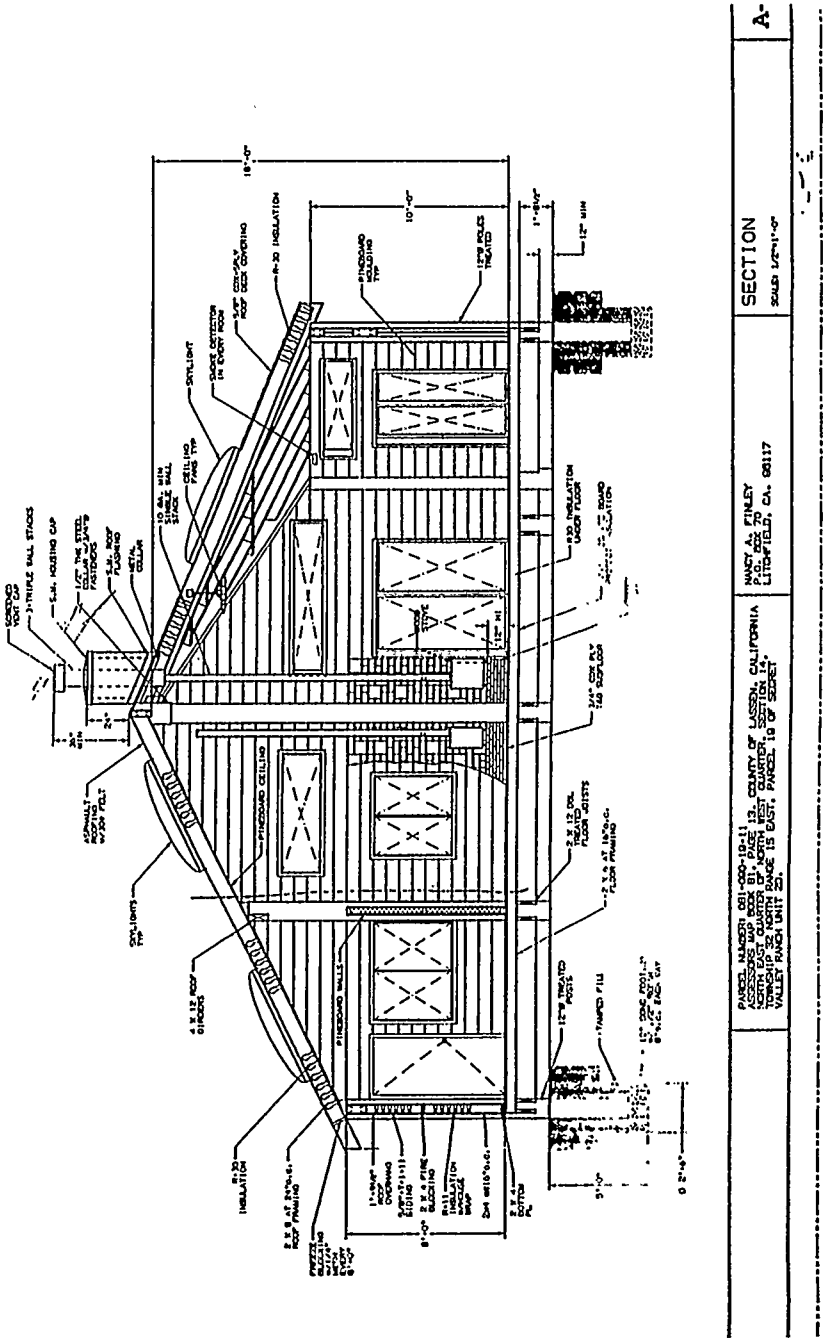
We the Owners respectfully request that you adopt the SECRET VALLEY ALTERNATIVE ROUTS.

Sincerely,

Nancy A. Finley

Nancy A. Finley
Hawkeye Ranch
P.O. Box 70
Litchfield, CA 96117
(916) 251-1677




SECTION
A-
NANCY A. FINLEY
P.O. BOX 70
LITCHFIELD, CA. 96117

RECEIVED JUN 0 1 1995

JUNE 2, 1995
5945 CASTLE TERRACE
CENTRAL POINT, OREGON - 97502

LISA LLYKENS, PROJECT MANAGER
FEDERAL ENERGY REGULATORY COMMISSION
825 CAPITOL STREET, NE
WASHINGTON, D.C. 20426

General Public Comment Set 144

GOODYEAR K. WALKER, PROJECT MANAGER
CALIFORNIA STATE LANDS COMMISSION
100 HOWE AVE., SUITE 100-SOUTH
SACRAMENTO, CA. 95814

JULIE HALLIGAN/PETER HUMM
CPUC/BLM
c/o ASPEN ENVIRONMENTAL GROUP
30423 CANWOOD STREET, SUITE 218
AGOURA HILLS, CA. 91301

RE: CACA-33319, FERC DOCKET NO. CP93-685-000, FERC/EIS-0078F, STATE CLEARINGHOUSE NO. SCH93112055, CPUC APPLICAATION NO. 93-11-018 BLM CASE NO. CACA-31406.

PLEASE BE ADVISED THAT THIS LETTER IS BEING SENT TO THE AGENCIES LISTED ABOVE DUE TO MY INABILITY TO FINISH MY COMPLAINT AND INJUNCTIONS TO BE FILED WITH THE UNITED STATES COURT FOR THE DISTRICT OF OREGON AND TO SEND COPIES OF SUCH DOCUMENTS TO THE LISSTED AGENCIES

THISS LETTER IS BEING FORMULATED FROM MEMORY DUE TO LACK OF TIME TO CHECK OUT ALL OF THE PARTICULARS AS TO DATES ETC..AND DUE TO THE FACT THAT THE UNLAWFUL ACTIONS OF THE CONSPIRATORS HAS GREATLY EXACERBATED MY SSTRESS DISABILITY AND CAUSED EXTREEM PROBLEMS WITH MY EYES SO THAT I HAVE BEEN UNABLE TO DOUBLE CHECK SUCH ITEMS BEFORE FORMULATING THIS LETTER THEREFORE THE INFORMATION IS BEING GIVEN TO THE BEST OF MY RECOLLECTION AND AS TO ALL OF THE STATEMENTS I BELIEVE THEM TO BE TRUE AS TO THE BEST OF MY KNOWLEDGE..

WHEN TUSCARORA GAS COMPANY EXPRESSED A DESIRE TO PLACE A 2,000 PSI GAS LINE ALONG PROPERTY WE OWN IN LASSEN COUNTY AND AFTER HAVING TALKED TO THE AAGENTS IN THE OFFICE IN SUSANVILLE CALIF. I DETERMINED BASED ON THE INFORMATION THAT THEY GAVE ME THAT SUCH A LINE WOULD NOT ADVERSELY AFFECT THE USE OF THE PROPERTY. IT WAS ONLY AFTER I WAS LATER CONTACTED BY SIERRA PACIFIC POWER COMPANY AND DID FURTHER RESEARCH THAT I DETERMINED THAT THERE WAS A CONSPIRACY BETWEEN TUSCARORA GAS COMMPANY (OWNED AT LEAST 50% BY SIERRA PACIFIC), SIERRA PACIFIC POWERCOMPANY AND AGENTS AND EMMPLOYEES OF THE TWO COMPANIES TO FALSELY AND FRAUDULENTLY WITHOLD INFORMATION NECESSARY FOR INFORMED CONSIDERATION OF THE AFFECTS SUCH GAS LINE WOULD HAVE ON THE PROPERTY IN QUESTION. GP. 144-1

TUSCARORA GAS COMPANY HAD A CLEAR DUTY TO INFORM US OF THE FACT THAT SIERRA PACIFIC POWER COMPANY WHO IS IN FACT THE INTENTY FOR WHICH BOTH THE GAS LINE AND POWER TRANSMISSION LINES ARE BEING BUILT INTENDED TO CREATE A UTILITY CORRIDER AND THAT BY NOT OBJECTING TO THE PLACEMENT OF THE GAS LINE COPY OF THE ORDER MADE OUT BY DRAKKULITCH AND REQUIRING THAT WE RESOND WITHIN 5 DAYS IF WE OBJECTED TO THE PROPOSED COPY. I HAD A NUMBER OF OBJECTIONS INCLUDING THE CLAIM THAT I HAD BEEN ALLOWED TO PRESENT MY CASE AND CALLED DRAKULITCH AT SIERRA PACIFIC. I WAS FORCED TO WAIT ON THE LINE UNTIL HARVEY WAS INCLUDED IN THE CONVERSATION. HARVEY TOOK OVER THE CONVERSATION AND RAN THE PROCEEDINGS . NOTHING IN THE LAW ALLOWS A JUDGE TO INTERVENE IN A PROCEEDINGS BETWEEN THE PLAINTIFF AND DEFENDANT CONCERNING THE WORDING OF THE ORDER. THE ORDER AS DESIGNED IN CONSPIRACY BETWEEN DRAKULITCH AND HARVEY OVER MY OBJECTIONS IS FALSE AND FRAUDULENT AND DOES NOT CORRECTLY SHOOW WHAT ACTUALLY HAPPENED ON THE DATE OF THE HEARING.

NOTHING IN THIS LETTER SHALL BE CONSTRUED AS LIMITING THE UNLAWFUL ACTIONS OF THE CONSPIRATORS TO THOSE INCLUDED IN THIS LETTER. I HAVE SPENT THE ENTIRE DAY MAKING OUT THIS LETTER AND DUE TO THE FACT IT WILL BE NECESSARY FOR ME TO TAKE IT TO THE POSTOFFICE IN GOLD HILL BEFORE THEY CLOSE AT 5:P.M. I WILL BE ALBE TO ONLY LIST SOME OF THE MOST IMPORTANT UNLAWFUL ACTIONS IN THIS LETTER.

ON JANUARY 31, 1995 WE RECEIVED IN THE MAIL A "**NOTICE OF PREHEARING CONFERENCE" DATED JANUARY 26, 1995.** THE ENVELOPE WAS ALSO POSTMETERED JAN 26 95 THIS DOES NOT NECESSARILY INDICATE THE DATE ON WHICH IT WAS MAILED. THE 26TH WAS A THURSDAY. WE RECEIVED THE NOTICE ON THE FOLLOWING TUESDAY JAN. 31ST. THE PREHEARING CONFERENCE WAS SET FOR FEBRUARY 6, 1995. FIVEDAYS AFTER WE RECEIVED THE NOTICE. INCLUDED IN THE NOTICE WAS A FURTHER NOTICE WHICH REQUIRED THAT IF SPECIAL ACCOMODATIONS FOR THE DISABLED WERE NEEDED THE ARRANGEMENTS "MUST" BE MADE "**FIVE WORKING DAYS IN ADVANCE OF THE EVENT.**" IF THE THIERTYFIRST IS COUNTED AS ONE DAY, AND THE MAIL COMES TO OUR PLACE AROUND NOON EACH DAY SO THATS ONLY 1/2 DAY AT THE MOST, IT LEAVES TUES., WED., THURS., AND FRI., FOUR WORKING DAYS IN WHICH TO MEET THE FIVE WORKING DAY TIME LIMIT. LEGALLY SHALL AND MUST ARE MANDATORY, MAY IS PERMISSIABLE THEREFORE THE NOTICE WAS NOT SENT IN TIME FOR US TO MEET THE LEGAL REQUIREMENTS OF THE NOTICE. **SECTION1013 C.C.P.** REQUIRES THAT WHEN AN ACT IS TO BE DONE OR A RIGHT IS TO BE TAKEN AND NOTICE IS SINT BY MAIL THE TIME IN WHICH THE ACT IS TO BE DONE OR RIGHT TAKEN IS EXTENDED BY FIVE DAYS IF THE NOTICE IS SENT TO AN ADDRESS INSIDE CALIFORNIA AND TEN DAYS IF SENT TO AN ADDRESS OUTSIDE OF CALIFORNIA. CALIFORNIA PUBLIC UTILITIES COMMISSION TITLE 220 ARTICLE 14, RULE 52 NOTICE REQUIRES GP. 144-1

(1) IN COMPLAINT OR INVESTIGATION PROCEEDINGS, THE COMMISSION SHALL GIVE NOTICE OF HEARING NOT LESS THANTEN DAYS BEFORE THE DATTE OF HEARING, UNLESS IT BE FOUND THAT PUBLIC NECESSITY REQUIRES HEARING AT AN EARLIER DATE. COMPARABLE NOTICE ORDINARILY WILL BE GIVEN WHEN HEARINGS ARE HELD IN APPLICATION PROCEEDINGS. (SEE P.U. CODE SECTION 170-)

I CALLED THE CLALNDER CLERK AND INFORMED THEM 1. THAT THEY HAD NOT GIVEN ME SUFFICIENT TIME TO PREPARE AND TRAVEL SOME 300 MILES TO THE PREHEARING CONFERENCE AND THAT CCP REQUIRED THAT THE TIME BE EXTENDED BY 10 DAYS WHEN NOTICE WAS SERVED BY MAIL OUT OF STATE. THEY CLAIMED THAT THEY ONLY HAD TO COMPLY WITH THE COMMISSION

THE FOOURTH INCIDENT CONCERNED THE MOTION I HAD FILED WITH THE COURT CLERK THAT MORNING. THIS MOTION WAS THE DIRECT RESULT OF THE FACT THAT I KNEWBASED ON HARVEYS ACTIONS IN THE PAST THAT I WOULD NOT BE GIVEN DUE PROCESS OF LAW IN "HIS" COURTROOM. THE MOTION INCLUDED ALL OF THE POINTS WHICH I INTENDED TO RAISE ORALY IF GIVEN AN OPORTUNITY AND IS PRI9MA FACIA EVIDENCE OF THE UNLAWFUL ACTIONS OF HARVEY IN REFUSING TO ALLOW ME TO PRESENT MY ARGUMRNTS AGAINSSST ALLOWING SIERRA PACIFIC OR THEIR ASSIGNEES ONTO OUR LAND. HARVEY JUST HAPEENED TO HAVE THE APPROPRIATE SECTION IN THE LAW BOOK AT HIIS SIDE((COULD IT HAVE BEEN DONE ON PURPOSE?) AND CLAIMED THAT I HAD TO SERVE THA OPPOSING PARTY X NUMBER OF DAYS BEFORE THE HEARING, NO MATTER THAT THE DATE OF THE HEARING PRECLUDED ENOUGH TIME TO MAKE SUCH RESONSE OR THAT THE EXTENSIONS OF TIME HAD BEEN TAKEN UUUP IN RESEARCH INTO HIS DISQUALIFICATION AND GAINING COPIES OF SECTIONS OF C.C.P. CONCERNING EMINENT DOMAIN SINCE I HAD BEEN UNABLE TO CORRECTLY READ ALL OF THE INFORMATION ON EMINENT DOMAIN AND DUE TO THE SMALL SIZE OF CASE LAW PRINT I HAD BEEN EXPERIENCING GREAT DIFFICULTY READING THE NECESSARY SECTIONS. HARVEY DENIED MY WRITTEN MOTION HOOWEVER IT CLEARLY SHOWS WHAT I INTENDED TO ORALY PRESENT.

THE FIFTH INCIDENT IS THE MOST IMPORTANT. **DUE PROCESS OF LAW REQUIRES THAT THE PLAINTIFF OR HIS ATTORNEY PRESENT THEIR CASE AND THAT THE DEFENDANT OR ATTORNEY PRESENT THEIR CASE. THE FUNCTION OF THE JUDGE IS TO LOOK AT ALL THE EVIDENCE PRESENTED AND THEN MAKE AN IMPARTIAL JUDGMENT BASED ON THE FACTS.** DRAKULICH BEGAN BY CLAIMING THAT SINCE I HAD NOT SERVED MY MOTION THE REQUIRED NUMBER OF DAYS BEFORE THE HEARING I SHOULD NOT BE ALLOWED TO ARGUE AGAINST HER PETITION. THE FACT IS THAT ALL OF THE OTHER DEFENDANTS WHO APPEARED IN THIS ACTION WERE ALLOWED TO MAKE THEIR STATEMENTS AND THEREFORE SUCH ACTION CONSISTS IN VIOLATION OF THE CONSTITUTIONAL RIGHT TO **EQUAL PROTECTION OF THE LAW.** I READ THE CLAIM BY SIERRA THAT THEY HAD THE RIGHT OF EMINENT DOMAIN AND SECTION 1240.030 CCP AND MADE THE POINT THAT SIERRA PACIFIC CLAIMED THE RIGHT TO EMINENT DOMAIN WHEN THEY HAD NOT BEEN AFFORDED THAT RIGHT ON THEIR NEW PROJECT, THE ALTURAS INTERTIE. HARVEY ARGUED THAT SIERRA WAS NOT CLAIMING THEY HAD THE RIGHT TO EMINENT DOMAIN ON THE ALTURAS INTERTIE PROJECT. HARVEY CLAIMED AT ONE POINT THAT HE COULDN'T HEAR ME AND I RESPONDED LOUDER, WE ARGUED BACK AND FORTH WITH ME CLAIMING THAT SIERRA PACIFIC HAD NO RIGHT TO THEIR CLAINED EMINENT DOMAIN AND HARVEY CLAIMING THAT THEY WERE NNOOT CLAIMING THE POWER OF EMINENT DOMAIN. HARVEY ACCUSED ME OF SHOUTING, THREATENED ME WITH CONTEMPT AND GRRANTED SIERRA PACIFIC'S PETITION. **PLEASE GO BACK TO THE QUOTATION BY SIERRA PACIFIC AND READ IT AGAIN. THERE IS NO WAY ANYONE WHO CAN READ CAN DENY THAT THE CLAIM BY SIERRA PACIFIC IS THAT THEY HAVE THE POWER OF EMINENT DOMAIN ON THE ALTURAS INTERTIE PROJECT. DUE TO THE UNLAWFUL RULING BY HARVEY SIERRA PACIFIC WAS ALLOWED TO INVADE OUR PROPERTY IN VIOLATION OF THE CONSTITUTIONAL RIGHT TO OWN** PROPERTY WHICH INCLUDES THE RIGHT TO PREVENT PERSONS YOU DON'T WANT FROM ENTERING YOUR PROPERTY.

HARVEY UNLAWFULLY INTERFERRED A FEW DAYS LATER IN AN ACTION WHICH BY LAW IS TO BE BETWEEN THE PLAINTIFF AND DEFENDANT. WE RECEIVED A

GP. 144-1

PROVIDED ME WITH PROOF THAT ASPEN IS NOT UNBIASED BUT IS PARTICIPATING IN A CONSPIRACY TO DENY DUE PROCESS OF LAW, EQUAL PROTECTIION UNDER THE LAW AND THE RIGHT TO PETITION THE GOVERNMENT FOR A REDRESS OF GRIEVENCES IN CONDUCTING TTHIS ENTIRE PROCEEDINGS AND THAT THE CALIFORNIA STATE LANDS COMMISSION HAS TAKEN NO ACTION TO PROTECT THE RIGHTS OF THE OWNERS OF PROPERTY IMPACTED BY THE GAS LINE AND THE RESULTANT UTILITY CORRIDOR. WE ARE ALSO ASKING THAT THE FEDERAL ENERGY REGULAATORY COMMISSION TAKE A FURTHER LOOK AT THE INTERACTION BETWEEN TUSCARORA AND SIERRA PACIFIC AND THE FACT THAT TUSCARORA IS IN FACT SIERRA PACIFIC AS STATED BY ROSS ANDERSON OF SIERRA PACIFIC AND CONFIRMED BY THE STATEMENTS OF EMMPLOYEES AND AGENTS OF TUSCARORA WHOO TOLD ME THAT SIERRA PACIFIC WANTED THE GAS FOR THEIR ELECTRIC PLANT IN TRACY (CONFIRMED BY OTHER DOCUMENTS) AND LACKING THE EXPERTESE TO CONSTRUCT THE PIPELINE FORMED A PARTNERSHIP WITH TRANS CANADA PIPELINES TO CONSTRUCT THE LIINE. IT SHOOULD BE NOTED THAT BOTH TUSCARORA AND SIERRA PACIFIC ARE LOCATED AT THE SAME ADDRESS IN RENO, NEVADA

AS A DIRECT AND PROXIMATE RESULT OF THE UNLAWFUL PETITION AND OTHER PAPERS FILED IN LASSEN COURT AND MY FAILURE TO GET JUDGE HARVEY WHO HAD COMMITTED A NUMBER OF UNLAWFUL ACTIONS IN LASSEN SUUPERIOR COURT INVOLVING ME IN ANOTHER CASE IT WAS NECESSARY FOR ME TO ATTEND A FARCE CLAIMED TO BE A HEARING IN LASSEN COUNTY SUUPERIOR KANGAROO COURT. THE FIRST INCIDENT AT THE "HEARING" WAS THE FACT THAT HARVEY DELIBERATLY HELD THE ACTION IN WHICH I WAS INVOLVED TO THE LAST SO THAT THERE WOULD NOT BE ANY WITNESSES TO HIS UNLAWFUL ACTIONS EXCEPT HIS CRONIES IN THE COURTROOM AND THE OPPOSITION. THE SECOND INCIDENT WAS CONDUCTED BY KATHLWEEN M. DRAKULICH, ATTORNEY FOR SIERRA PACIFIC, WHO TOLD ME THAT I HAD CHOSEN THE WRONG SIDE ON WHICH TO SIT WHEN THE PETITION WAS CALLED. THE LIGHTING IN THE COURTROOM IS EXTREEMLY INADEQUATE, **I AM AFFLICTED WITH A DISABILITY WHICH HAS BEEN DIAGNOSED AS LOSS OF THE ABILITY TO ADAPT TO STRESS AND HAVE BEEN ADVISED TO AVOID STRESS AS MUCH AS POSSIBLE, ONE OF THE RESULTS OF STRESS IS THE PROBLEM WITH MY EYES CAUSED BY STRESS.** IN ORDER FOR ME TO SEE ADEQUATLY TO PRESENT MY CASE IT WAS NECESSARY FOR ME TO GET AS CLOSE TO ONE THE HANGING LITES IN THE COURTROOM AS POSSIBLE WHICH MENT CHOOSING THE TABLE ON THE RIGHT HAND SIDE OF THE COURTROOM. WHEN I WENT TO THIS TABLE, DRAKULICH BEHIND ME, SAID, WRONG TABLE, THERE WERE NO PLACARDS ON THE TABLES SAYING PLAINTIFF OR DEFENDANT AND I KNOW OF NO RULE OF COURT WHICH REQUIRES THAT PLAINTIFFS SIT ON THE RIGHT AND DEFENDANTS SIT ON THE LEFT. I CHARGE THAT DRAKULICH WAS TRYING TO USE THIS AS A MEANS TO DERAIL MY ABILITY TO PRESENT MY CASE. THE THIRD INCIDENT ALSO ORCHISTRATED BY DRAKULICH WAS THE INSTIGATION OF A SO CALLED OBJECTION. DRAKULICH CLAIMED SHE WANTED TO MAKE AN OBJECTIION, CLAIMED THAT I HAD THREATENED TO SHOOT A PERSON OR PERSONS WHO SHE REFUSED TO IDENTIFY. DRAKULICH CLAIMED THAT SIERRA WAS CONSIDERING ASKING FOR A RESTRAINING ORDER TO PREVENT ME FROM TAKING THE CLAIMED ACTION. IF A RESTRAINING ORDER WERE REQUESTED AND I HAD BEEN NOTIFIED IN SUFFICIENT TIME TO RESPOND, I HAD BEEN NOTIFIED OF THE PARTIES WHO MADE THE CLAIMS AND ALLOWED AN OPORTUNITY TO CROSS EXAMINE THEM AN ACTION COULD HAVE POSSIBLY BEEN LEGALLY INSTITUTED **HOWEVER THERE IS NO LEGAL BASIS FOR MAKING AN "OBJECTION" CLAIMING THAT A PARTY HAS THREATENED SOMEONE, FAILING TO PROVIDE DOCUMENTATION TO SUBSTANTIATE THE ALLIGATIONS OR EVEN PROVIDE THE NAMES OF THE ALLEGED PARTIES.** THE ONLY REASON FOR SUCH AN "OBJECTION" IS TO GAIN A PSYCHOLOGICAL ADVANTAGE OVER YOUR OPPPONANT IN THE COURTROOM.

GP. 144-1

OPERTAT THE POWERLINE WERE GIVEN, NO POWER OF EMINENT DOMAIN WAS GIVEN, NO ROUTE WAS APPROVED, SIERRA PACIFIC WAS NOT GRANTED A CERTIFICATE OF CONVENIENCE AND NECESSITY. AFTER PHONE CALLS AND LETTTERS IN WHICH SIERRA PACIFIC ATTEMPTED TO COIRCE US INTO GRANTING THEM RIGHT TO ENTER OUR PROPERTY THEY SERVED ON US DOCUMENTS FILED IN LASSEN SUUPERIOR COURT IN WHICH THEY FALSELY AND FRAUDULENTLY CLAIMED

:"PETITIONER IS BY LAW AUTHORIZED TO EXERCISE THE POWER OF EMINENT DOMAIN TO ACQUIRE PROPERTY FOR THE PURPOSE OF CONDUCTING ENVIRONMENTAL STUDIES AND TESTS, COLLECTION OF SAMPLINGS, TAKE PHOTOGRAPHS, MAKE APPRAISALS AND ENGAGE IN SIMILAR ACTIVITIES RELATED TO THE ALTURAS INTERTIE PROJECT PURSUANT TO CALIFORNIA CODE OF CIVIL PROCEDURE /1245.010"

AS A DIRECT RESULT OF THE SERVICE OFTHE FOREGOING FALSE AND FRAUDULENT DOCUMENTS ON US IT WAS NECESSARY FOR ME TO SPEND DAYS RESEARCHING AND COPYING IN LONGHAND COPIES OF THE RELEVENT SECTIONS OF CALIFORNIA CIVIL PROCEDURE SINCE THERE WAS NO PHOTOCOPY MACHINE IN THE LAW LIBRARY ON WHICH I COOULD MAKE COPIES. IT WAS NECESSARY FOR ME TO MAKE TRIIPS TO THE BLM OFFICE IN SUSANVILLE TO GET THE INFORMATION I NEEDED CONCERNING THE CLAIMED ALTERNATE ROUTES OF THE POWERLINE BECAUSE ROSS ANDERSON REFUSED TO ALLOW ME TO SEE TO MAPS OF THE PROPOSED POWERLINE CLAIMING TH T THE OFFICE IN RENO HAD TOLD THEM NOT TO LET ME SEE THEM. IT WAS ALSO NECESSARY FOR ME TO SPEND DAYS CONTACTING RADIO STATIONS AND NEWSPAPERS TO TRY TO DETERMINE IF SIERRA PACIFIC HAD IN FACT MADE ANY ATTEMMMPT TO NOTIFY INTERESTED PERSONS, INCLUDING LANDOWNERS WHO WERE DIRETLY AFFECTED BY THE PROPOSED ROUTE OF THE ROUNDTABLE MEETINGS AND OTHER PUBLIC MEETINGS TO WHICH THEY CLAIMED THE PEOPLE WERE INVITED SO THAT THEY COULD DISCUSS THE POWERLINE AND ITS EFFECTS ON THEIR PROPERTY. IT WAS ONLY AFTER A NUMBER OF DAYS OF IINVESTIGATION THAT I DESCOVERED THAT SIERRA PACIFIC HAD IN FACT MADE ONE ADVERTISEMENT IN THE LASSEN COUNTY TIMES NEWSPAPER SOME 7 AND 8 DAYS RESPECTIVLY IN ADVANCE OF TWO MEETINGS TO WHICH THE PUBLIC WERE INVITED. WE NEVER RECEIVED ANY NOTIFICATION OF SUCH MEETINGS AND I HAVE BEEN UNABLE TO FIND ANY LANDOWNERS WHO RECEIVED ANY NNOTIFICATIOON DESPITE THE CLAIMS IN THE LETTERS SENT US NOR WAS THERE ANY POSTCARD INCLUDED IN THE PACKET AS CLAIMED.

AT THE SCOPING MEETING FOR THE ALTURAS INTERTIE, **DESPITE THE CLAIMS OF ASPEN ENVIRONMENTAL GROUP TO THE CONTRARY,** WE WERE NOT GIVEN TIME TO PRESENT OUR CONCERNES AND OBJECTIONS. WE WERE GIVEN 5 MINUTES EACH TO SPEAK AND JULIE HALLIGAN AND THE REPRESENTITIVE FOR ASPEN REFUSED TO CONSIDER OR EVEN LOOK AT THE FACT THAT SIERRA PACIFIC WAS ATTEMPTING TO FORCE ITS WAY ONTO PRIVATE PROPERTY WHEN THERE WAS PUBLIC PROPERTY AVAILABLE FOR THE POWERLINE, IN **VIOLATION OF SECTION 1240.030 (SEE ABOVE) REQUIRING THAT THE PROJECT BE PLANNED IN THE MANNER COMPATABLE WITH THE GREATEST PUBLIC GOOD AND THE LEAST PRIVATE INJURY.** HALLIGAN AND THE ASPEN REPRESENTATIVE CLAIMED THAT THIS WAS NOT AN INVIRONMENTAL CONSIDERATION. I DISAGREED AT THE TIME AND I DISAGREE NOW. WHEN THERE IS PUBLIC LAND OVER WHICH SUCH POWERLINES MAY BE PLACED IT IS ONCONCHIONABLE TO ATTEMPT TO PLACE SUCH POWERLINES ON PRIVATE PROPERTY MERELY BECAUSE IT IS MORE CONVENIENT FOR ACCESS OF THE POWER COMPANY. AT THE TIME OF THE SCOPING MEETING I DID NOT FEEL THAT I HAD SUFFICIENT EVIDENCE OF AN ACTUAL CONSPIRACY IN WHICH CPUC, JULIE HALLIGAN, ASPEN AND THEIR REPRESENTATIVE WERE AND ARE PARTICIPATING. FURTHER ACTIONS OF CPUC AND ASPEN HAVE

GP. 144-1

WE WERE BEING SET UP AS A UTILITY CORRIDOR AND THAT IT WOULD MAKE IT EASIER FOR SIERRA PACIFIC TO PLACE A POWERLLINE IN THE SAME LOCATION.

AT THE SCOPING MEETING, BEING UNAWARE OF THE INFORMATION STATED IN THE PARAGRAPH ABOVE AND BELEIVING THAT TUSCARORA WAS AN HONERABLE COMPANY I FELT THAT THE PROBLEMS ASSOCIATED WITH THE GASLINE COULD BE WORKED OUT AND HAVING NO KNOWLEDGE THAT SIERRA PACIFIC/TUSCARORA INTENDED NOT ONLY TO PLACE A GASLINE ON THE PROPERTY BUT INTENDED TO USE IT AS A STEPINGSTONE TO PLACING A 345,000 VOLT POWERLINE ON THE PROPERTY AS WELL, AN ACTION WHICH WOULD COMPLETLY DESTROY ANY FINANCIALLY BENEFICIAL USE OF THE PROPERTY, I DID NOT OBJECT TO THE GASLINE.

OUR FIRST KNOWLEDGE OF THE IMMPENDING PPOWERLINE CAME WHEN WE RECEIVED A PHONE CALL FROM SIERRA PACIFIC ATA BOUT 11:30 P.M. TELLING USS THEY WERE SENDING DOCUMENTS FOR US TO SIGN GRANTING THEM ACCESS TO OUR PROPERTY FOR THE PURPOSE OF RESEARCH PURSUANT TO PLACING THEIR POWERLINE ON OUR PROPERTY. IN 1976 THE SOIL CONSERVATION SERVICE HAD DETERMINED THE POSSIBILE USES OF THE PROPERTY AND ONE OF THE MOST PROMISING WAS THE USE OF THE PROPERTY FOR A RECREATIONAL FACILITY. I HAD DESIGNED A FACILITY WHICH WOULD PROVIDE FOR A 12 +- ACRE POND WITH RECREATIONAL VEHICLE FACILITIES GOING AROOUND THE POND. WE WERE IN THE PROCESS OF NEGOTIATING THE FINANCING OF THE FACILITY AAT THE TIME SIERRA PACIFIC SHUT DOWN OOUR EFFORTS TO OBTAIN THE FINANCING BY SELECTING OUR PROPERTY AS A "PREFERRRED ROUTE" FOR THEIR POWERLINE,

GP. 144-1

I AM QUOTING THE FOLLOWING SECTION FROM THE CALIFORNIA CODE OF PUBLIC PROCEDURE AND DECLARE THAT IN NO WAY DOES THIS QUOTATION IN ANY WAY OR MANNER LIMIT THE REQUIREMENTS NECESSARY WHEN A PUBLIC UTILITY ATTEMPTS TO USE THE POWER OF EMINENT DOMAIN TO CONDEMN PROPERTY, WHETHER THAT CONDEMNATION BE TEMPORARY AS IN THE CASE OF SIERRA PACIFIC OR A PERMANENT CONDEMNATION.

SECTION 1240.030 CALIFORNIA CODE OF CIVIL PROCEDURE

THE POWER OF EMINENT DOMAIN MAY BE EXERCISED TO ACQUIRE PROPERTY FOR A PROPOSED PROJECT ONLY IF ALL OF THE FOLLOWING ARE ESTABLISHED

(a) THE PUBLIC INTEREST AND NECESSITY REQUIRE THE PROJECT.

(b) THE PROJECT IS PLANNED OR LOCATED IN THE MANNER THAT WILL BE MOST COMPATABLE WITH THE GREATEST PUBLIC GOOD AND THE LEAST PRIVATE INJURY.

(c) THE PROPERTY SOUGHT TO BE ACQUIRED IS NECESSARY FOR THE PROJECT.

ON FEBRUARY 4, 1994 THE CPUC ACCEPTED THE APPLICATION OF SIERRA PACIFIC FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AS BEING COMPLETE. ALL THAT WAS COMPLETE WAS AN APPLICATION FOR THE CERTIFICATE. THIS COMPLETE APPLICATION DOES NOT CONFERE WITH IT THE RIGHTS OF EMINENT DOMAIN OR ANY OTHER RIGHTS FOR THAT MATTTER TO DO OR TAKE ANY ACTION ON PRIVATE PROPERTY WHATSOEVER. **WHAT WAS COMPLETE WAS AN APPLICATION FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY FOR CONSTRUCTION AND OPERATION OF THE ALTURAS INTERTIE POWERLINE. NO RIGHTS TO CONSTRUCT OR**

RULES. THAT CLAIM IS ANALAGOUS TO CLAIMING THAT IF A STATE COMPLIES WITH STATE LAWS THEY DON'T HAVE TO COMPLY WITH THE CONSTITUTION OF THE UNITED STATES. ALJ CHRISTINE WALWYN CALLED ME BUT REFUSED TO RESCHEDULE THE HEARING AND GIVE ADAQUATE NOTICE. I HAD SUFFERING EXTENSIVE EXACERBATION OF MY STRESS DISABILITY AS THE RESULT OF HAVING TO FIGHT SIERRA PACIFIC AND TUSCARORA'S ATTEMPTS TO DESTROY OUR PROPEERTY AND HAD BEEN HAVING EXTENSIVE PROBLEMS WITH MY EYES AND IN PARTICULAR MY LEFT EYE IN WHICH I WAS EXPERIENCING PAIN AS WELL AS WATERING OF BOTH EYES AS THE RESULT OF TRYING TO READ EIS/EIR PRELIMINARY REPORTS FROM BOTH TUSCARORA AND SIERRA PACIFIC.

IT WAS NECESSARY FOR ME TO TRY TO TAKE CARE OF FAMILY NEEDS IN OREGON AND TRAVEL TO CALIFORNA THE NIGHT OF FEB. 5,95 IN ORDER TO BE AT THE CONFERENCE ON THE 6TH. THE REPORTERS TRANSCRIPT OF FEBRUARY 6,1995 , EVEN THOOUGH IT IS INACCURATE, NOT EVEN STATING THE SECTION THAT I MADE A MOTION TO HAVE THE HEARING RESCHEDULED TO A LATER DATE AND ATTEMPTED TO CITE THE GROUNDS. WALWYN REFUSED TO ALLOW ME TO COMPLETE MY MOTION AND DENIED IT. **MORE IMPORTANTLY WALWYN REFUSED TO ALLOW ME TO STATE THE ISSUES WHIXH I WANTED TO HAVE ADDRESED BECAUSE I HAD FILED A SUIT IN FEDERAL COURT CONCERNING THE MATTER. THE RESULT OF WALWYN'S UNLAWFUL ACTION IS THAT IT IS NECESSARY FOR ME TO FILE A FURTHER SUIT IN FEDERAL COURT AND GET AN INJUNCTION TO STOP THE ENTIRE PROCEEDINGS UNTIL THE MATTER CAN BE HEARD IN FEDERAL COURT.** GP. 144-1

A FURTHER RESULT OF THE UNLAWFUL ACTIONS OF THE CONSPIRATORS WAS THE FURTHER DAMAGE TO MY EYES PARTICULARLY THE LEFT EYE WHICH **CHANGED TO THE EXTENT THAT MY LEFT CONTACT LENSE STUCK TO MY EYE.** IT WAS THEREFORE NECESSARY FOR ME TO MAKE AN APPOINTMENT WITH AN OPTHAMOLOGIST AND LATER WITH AN OPTOMETRIST BOTH OF WHOM TOLD ME I COULD NO LONGER WEAR MY CONTACTS FOR THE PERIOD I HAD BEEN WEARING THEM (NECESSARY IN ORDER TO READ AND PREPARE THE DOCUMENTS TO TRY TO PROTECT OUR PROPERTY FROM TUSCARORA AND SIERRA PACIFIC) OR LOOSE THE ABILITY TO WEAR CONTACTS AT ALL. BECAUSE MY CONTACT LENSE PRESCRIPTION IS IN THE MINUS 13 RANGE AND THE NEW MYODISK LENSES ARE IN THE MINUS 15 RANGE (MOSST PEOPLE WHO WEAR GLASSES HAVE A RANGE FROM MINUS 1 TO MINUS 6) AND BECAUSE I THE CURVATURE OF THE MYODISK IS SUCH THAT THERRE IS EXTREEM DISTORTIOON AROUND THE EDGES I AM REDUCED TO WEARING THEM AT HOME AND MUST REDUCE MY WEARING OF MY CONTACTS. IT WAS NECESSARY FOR ME TO WAIT FOR AN APPOINTMENT WITH THE OPTOMETRIST AND WAIT 10 DAYS IN WHICH TIME I WAS UNABLE TO WEAR EVEN MY RIGHT CONTACT AND THEN WAIT OVER 30 DAYS TO GET NEW GLASSES AND CONTACTS DUE TO THE SEVERITY OF MY PRESCRIPTION. I HAVE THEREFORE BEN UNABLE TO READ THE VOLUMES OF EIS/EIR REPORTS, RESPOND TO THEM, OR ATTEND MEETINGS DUE TO THE FACT THAT I COULD NOT DRIVE FOR OVER 5 HOURS TO NORTHERN CLAIFORNIA WITH ONE CONTACT LENSE.

WHAT I WAS AABLE TO READ CLEARLY SHOWED ME THAT ASPEN WAS NOT IMMPARTIAL, THAT THEY CONCLUDED THAT POWERLINES IMPACTING THE RUNWAY OF A PRIVATE AIRPORT WERE NOT IMPORTANT BECAUSE THE FAA DIDN'T REQUIRE ANY ACTION TO BE TAKEN, FAINT CONSOLATION TO THE PILOT WHOSE AIRPLANE LOOSES POWER ON TAKEOFF **ASPIN IS AT LEAST 8 MILES OUT I WAS ABLE TO FIND OUR PROPERTY ON THE MAP THAT ASPEN PROVIDED** GP. 144-2

AND THE LOCATION THEY USED WAS SOME 8 MILES FROM THE MILEMARKERS IN THE FRONT OF THE PROPERTY. IF THEY CAN'T GET CLOSER THAN 8 MILES TO THE LOCATION OF A PIECE OF PROPERTY HOW CAN THEY DETERMINE THE LOCATION OF ARTIFACTS AND OTHER ENVIRONMENTAL CONCERNES. FURTHER ASPEN HAS DELIBERATLY DISREGARDED EVIDENCE OF BIRTH DEFECTS, CANCER AND OTHER PROBLEMS DIRECTLY ASSOCIATED WITH ELECTROMAGNETIC FIELDS AND CLAIMS THAT OTHER ROUTES ARE UNAVAILABLE BECAUSE THEY WOULD TAKE TOO LAONG TO CHECK OUT ENVIRONMENTALLY. THEY ARE THEREFORE AIDING SIERRA PACIFIC IN THEIR CHOSEN ROUTE TO THE DETREMENT OF THE OWNERS OF PRIVATE PROPERTY. **IT SHOULD FURTHER BE NOTED THAT ACCORDING TO ASPENS OWN REPORTS THE FEDERAL GOVERNMENT IS REEVALUATING HYDROELECTRIC POWERPLANTS IN THE NORTHWEST AND THERE MAY NOT EVEN BE ELECTRICITY AVAILABLE FOR THE FUTURE DEVELOPMENT SIERRA PACIFIC IS SEEKING.** GP. 144-2 GP. 144-3 GP. 144-4 GP. 144-5

DUE TO THE NECESSITY OF GETTING THIS LETER TO THE POSTOFFICE BEFORE5 P.M. IT IS NECESSARY FOR ME TO CONCLUDE WITH THE REMARKS I HAVE MADE.

BECAUSE OF THE UNLAWFUL ACTIONS OF THE CONSPIRATORS I RESPECTIVLY REQUEST THAT TUSCARORA AND SIERRA PACIFIC BE DENIED A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY ON THE GROOUNDS THAT THEIRCONSPIRACY AND UNLAWFUL ACTIONS MAKE THEM UNFIT TO RUN SUCH UTILITIES.

SINCERILY

FRANK E. BRAZE

RECEIVED JUN 1 ? 1995 RECEIVED JUN 1 ? 1995

May 25, 1995

Ms. Julie Halligan- California Public Utilities Commission
Mr. Peter Humm - Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

General Public Comment Set 145

Re. FORMAL PROTEST OF THE ALTURAS 345KV POWER LINE
CPUC Application Number 93-11-018 and BLM Case Number CACA-310406

Dear Julie, and Peter,

I am in opposition to the proposed new powerline, and its construction for the following reasons:

1. Damage to the environment. What I mean by this is, look at the Southern California Desert areas and the incredible environmental damage from the powerlines, roads and related damage to the area. This directly relates to new roads cut under the powerlines, which will never go away, and increased vehicle traffic access will be introduced to sensitive desert wild life areas. GP. 145-1

2. Taking a nice place like Pevine and running 345 KV POWER LINE through it, would be an ugly eye sore which would lower property values.

3. Creating a whole new powerline, and road does not make since, when their are existing power corridors which could be used to transfer power. GP. 145-2

4. Questionable political tactics used by Sierra Pacific, trying to keep material facts about the proposed power lines away from the public for as long as possible. Then at the last minute, make the material facts known well into the BLM Land Negotiation process. GP. 145-3

Thank you Julie, and Peter, for your time in regards to this matter.

Sincerely,

William P. Moyer
6240 W. Choctaw Ct
Sparks, Nv 89433

General Public
Comment Set 146

P.O. Box 206
Sierraville, CA 96126
June 3, 1995

EAGLE LAKE OFFICE
RECEIVED
JUN - 8 1995
BUREAU OF LAND MGMT

Peter Humm
Bureau of Land Management
705 Hall Street
Susanville, CA 96130

'Re: Reno Alturas Intertie
CPUC # 94042001
BLM # CACA 31406

Dear Mr. Humm:

The proposed land swap with Sierra Pacific Power is not consistent with: the Sierra County General Plan, the National Forest Use Plan, nor the charter of the Sierra Pacific Power Company. (GP. 146-1)

This project does nothing to improve service to the resident customers of Sierra Pacific's area of operation. Its primary purpose seems to be either provide dividends to Sierra Pacific's stockholders, or enhance the image of Sierra Pacific's executives. (GP. 146-2)

The consequences of the land swap, particularly the visual destruction of the Dog Valley is unacceptable and unnecessary. There should be binding conditions attached to any exchange requiring transmission lines to be routed along existing transportation corridors. That way the existing land use in Dog Valley will remain and Sierra Pacific's customers will be more likely to receive quality service., with facilities directed to serve the Company's intended market. (GP. 146-3)

This proposal needs to be reviewed to conform with the General Plan and the recent vote of the Sierra County Board of Supervisors disapproving of the project.

Yours truly;
Ken Bechtol
Ken Bechtol

RECEIVED JUN 16 1995

May 31, 1995

Re: Nevada alternate route for Alturas Transmission Line Project

General Public Comment Set 147

To: Julie Halligan / Peter Hurmm

We are writing in concern to the proposed Nevada alternate route for Alturas Transmission Line Project. We first heard of the 345 kilovolt line Monday May 15 after the first Sparks City Council meeting of which we had not been notified.

My husband, Jeff Brown + I, Sheryl Brown have lived in the Sparks area all of our lives. It is outrageous to us as tax-paying, law-abiding citizens that we were not kept better informed of this ridiculous proposal. Evidentally Sparks City Council has known of it since Easter, why werent we told then? (GP. 147-1)

We researched with the City Planning Agency and got future zoning maps of the area <u>before</u> we decided to buy. I had concerns about EMF (electro-magnetic fields) and talked to Mr. Kuldip Sandu at SPPC <u>before</u> we decided to buy. Jeff talked to Paul Beck at the Pauite Pipeline (887-2740) <u>before</u> we decided to buy. Confident we had covered our bases well, we proceded with the big decision to invest in a new home.

We moved into our new Vintage Hills dream home 5 months ago after looking a year, with expectations of living in it until our 2 young sons are through school (at least 16 years). I feel strongly about providing our children with a safe, stable enviroment where they will not be moved around or transferred once they do start school.

So much for our careful planning! Now we are stuck wondering if we should start planting grass in the backyard for the kids this summer or will our hard work be destroyed? Should we cancel the order of custom blinds for our windows? So you tell me – how would your families like living in "limbo" waiting for the California Public Utilitie Commission to make <u>its</u> big decision? (GP. 147-1)

Now lets get to that. From what we understand:

A. The first route was chosen by 2 environmental firms as being the most safe.

B. It is a shorter distance by 19 miles.

C. It is not in a brand new residental district, relocating 64 families.

D. It is more cost effective by upwards of $20 million

GP 147-1

So tell me - where is the big decision?
We do not want to move, however if you go forward with this we will expect fair market value on our home with the improvements that have already been made and moving expenses paid for. I have heard that moving is the 3rd most stressful situation we will face in our lives after death and divorce. We are NOT looking forward to it.
You will keep us informed, won't you?

Cheryl L. Brown
Jeffrey S. Brown

862 Calle Myriam Dr.
Sparks, NV. 89436
(702) 626-0862

Lee Roger Anderson

Principal, E C P D
Environmental Consulting, Planning, and Design
P. O. Box 1191 Mt. Shasta, California 96097 • Telephone and Facsimile 916-926-2782

To	Initial	Date
AD		
ASD		
ADMIN		
ECO		
OPER		
EA		
Minerals		
Recreation		

Return to _____
Library _____

General Public Comment Set 148

June 1, 1995

Julie Halligan, Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA. 94102

Herrick E. Hanks, District Manager
Bureau of Land Management
705 Hall Street
Susanville, CA. 96130

Re: Comments on Draft EIR/S
Alturas Intertie Project–Sierra Pacific Power Company
CPUC Application No. A93-11-018 & BLM No. CACA-31406

These are my written comments on the Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/S) for the Alturas Intertie Project proposed by the Sierra Pacific Power Company (SPPCo.), CPUC Application No. A93-11-018 & BLM No. CACA-31406. I believe that the DEIR/S is **fatally flawed** for many reasons. I provided verbal comments at the public hearing before the Administrative Law Judge (ALJ) Richard Careaga in Alturas, CA, on April 17, 1995. This letter is in addition to my verbal remarks.

FLAWED ASSUMPTIONS ON AVAILABILITY OF BPA POWER

- On page A-38 of the DEIR/S, the discussion is fatally flawed regarding availability of low-cost hydroelectric power from Bonneville Power Administration (BPA) for this SPPCo project. The current trend in relicensing of hydroelectric facilities in the Pacific Northwest is to **decrease** total generation capacity in favor of lessened adverse impacts to anadromous fisheries. The US Fish and Wildlife Service and the National Marine Fisheries Agency are actively and aggressively seeking greater instream flows at existing hydroelectric facilities, meaning less available water for hydroelectric generation.

- Special interest groups, including anglers and Native American Indians, are lobbying for the complete removal of several existing hydroelectric facilities in the Pacific Northwest and the restoration of fisheries habitat to "pre-hydroelectric conditions." I do not personally agree with the complete removal of any existing hydroelectric facilities. However, the trend is obvious–existing generation capacities and availability of low-cost hydroelectric power will not increase, but rather, may actually decrease substantially in the near future. GP. 148-1

- The DEIR/S says on page A-38, *"If a System Operating Strategy is adopted that causes a reduction in hydroelectric power operation or capacity, BPA will need to acquire alternate resources."* What alternative resources? Nuclear power? Coal-fired power? Solar power? Wind-generated power? *"This in turn, could* (adversely) *affect the availability of low cost hydroelectric power for*

SPPCo. The Draft SOR EIS was released for public comment in July, 1994. What were the recommendations of the Draft SOR EIS? Did it recommend **more** low-cost hydroelectric power availability, or **less**, or **the same**?

- *"The Final SOR EIS is expected to be released in July, 1995."* What does the Final EIS say about power availability? Is this SPPCo Project null and void based on projected BPA operations and future constraints on availability of low-cost hydroelectric power from BPA? GP. 148-1

- As stated on page A-37, *"About 85 percent of the power BPA sells is hydroelectric."* **Because "access to available low-cost hydroelectric power" is one of three major objectives of this SPPCo Project** (page B-48), **if hydroelectric power availability decreases substantially due to increased instream flows for anadromous fisheries values, what is the likelihood of this SPPCo Project becoming obsolete before it is even built? This deficiency is a potential fatal flaw in the DEIR/S and the entire project.**

SITE/ROUTE SELECTION AND GENERAL PLAN INCONSISTENCIES

- Buried in the center of the DEIR/S (pages C.8-1 to 8-70) are numerous references to the inconsistencies with the SPPCo Proposed Project with existing General Plans and Land Management Plans. The proposed project is inconsistent with specific land management direction given in the General Plans of Modoc, Lassen, and Sierra Counties and the Land and Resource management Plan for the Modoc National Forest. GP. 148-2

- Specifically, Segment A violates the spirit and intent of the *1991 Modoc National Forest Land and Resource Management Plan* which states (page 4-15), *"Limit allocations of single-purpose transmission and transportation corridors. Place new transportation and utility facilities within or contiguous to existing corridors. Encourage the use of private lands, where appropriate, for new corridors."* This quote is also found in the SPPCo DEIR/S on page C.8-39, but the direction given has been totally ignored in the site/route selection for the project. **How can the CPUC/BLM ignore such clear, concise direction, and suggest a new corridor on Modoc National Forest lands (Segment A and Devils Garden Substation)?** This is a fatal flaw in the DEIR/S and the project site/route selection process. GP. 148-3

- Also, the Devils Garden Substation and all project segments in Modoc County violate the spirit and intent of the *1988 Modoc County General Plan* which states that transmission lines *"...should be consistent with the land uses and development to minimize adverse social or environmental impacts. Such lines should avoid interference with adjacent land uses and assure that aesthetic values will not be degraded."* (See DEIR/S page C.8-41.) The proposed project clearly violates this direction throughout all of Modoc County. GP. 148-4

Alturas Intertie Project–Sierra Pacific Power Company
CPUC Application No. A93-11-018 & BLM No. CACA-31406
Page 5 of 10 June 1, 1995

within the 660-foot study corridors based on their weighing of the environmental constraints with respect to their design considerations." What are the environmental constraints? What is the relative weight of each environmental constraint in relation to every other one? Why only a 660-foot wide corridor?

- Where in the DEIR/S can the reader find a specific, concise list of the evaluation criteria and weighting that were used during preparation of the DEIR/S for site/route selection?

- One unstated but explicit evaluation criterion which appears in numerous places throughout the DEIR/S is the siting of project facilities *"300 feet from existing residences"* and *"300 feet from sensitive receptors."* How was this distance chosen by the CPUC/BLM? **Is this the new standard for assessing land use, recreation, and visual resource impacts in California?**

- It appears that the entire SPPCo Preferred Project has been determined to be environmentally superior because it is the site/route which is more than 300-feet from existing residences and sensitive receptors. This is ludicrous! Many existing transmission lines occur within urban areas throughout our Nation, all of which are closer than *"300 feet from sensitive receptors."* Does the CPUC/BLM suggest that these urban transmission lines will no longer be acceptable in California or in the United States? GP. 148-8

- If, instead of the unstated but explicit evaluation criterion of *"300 feet from sensitive receptors,"* the criterion were **"Does the project destroy or impact open space and long-distance vistas?"** how different would be the outcome of the CPUC/BLM's environmentally superior alternative? I suspect it would be totally different, **because the proposed project absolutely destroys literally thousands of acres of open space lands and long-distance vistas in Northeastern California.**

- I insist that this evaluation criterion, **"Does the project destroy or impact open space and long-distance vistas?"** be adopted and incorporated into the Final EIR/S. **What new sites/routes/corridors has the CPUC/BLM missed that are environmentally superior and preferred considering this new evaluation criterion? I insist that this issue be addressed in the Final EIR/S.**

DRAFT EIR/S CONCLUSIONS NOT SUPPORTED BY FACTS

- *"...the following route alignments and substation sites...are considered environmentally superior under CEQA (and are the NEPA lead agency-preferred alternative: Proposed Segment A, due primarily to the fact that this route would avoid many of the visual and land use impacts associated with Alternative Segment B that cannot be fully mitigated."* (page ES-13). In fact, the Alturas Alternative (Segment B) is environmentally superior to the Devils Garden proposed project. The Devils Garden area, including Daggert Canyon and the GP. 148-9

Alturas Intertie Project–Sierra Pacific Power Company
CPUC Application No. A93-11-018 & BLM No. CACA-31406
Page 6 of 10 June 1, 1995

BLM mountain bike route and scenic vista point, are much more environmentally sensitive than Segment B. Greater consideration needs to be given in the Final EIR/S to significant, non-mitigable adverse environmental impacts at the Devils Garden and Daggert Canyon areas.

- Specific items of concern that create significant, non-mitigable adverse environmental impacts in the Devils Garden and Daggert Canyon areas are:
  - degradation of existing open space,
  - degradation of long-distance vistas,
  - degradation of recreation settings and opportunities,
  - degradation of existing and proposed mountain bike trails,
  - degradation of undisturbed skyline by transmission line conductors and towers,
  - degradation of 20-additional acres of juniper woodlands,
  - degradation of 20-additional acres of surface soil disturbance,
  - degradation of five known significant archeological sites (versus one non-significant site on Segment B),
  - degradation of potential Indian Ceremonial Sites at Daggert Canyon (versus none on Segment B), and
  - degradation of two significant stream crossings at Daggert Canyon (versus none on Segment B).

- *"...the following substation sites...are considered environmentally superior under CEQA (and are the NEPA lead agency-preferred alternative): Proposed Alturas Substation (Devils Garden Site) due to avoidance of significant land use and visual impacts associated with the alternative substation's (Mill Site) location in close proximity to sensitive land uses and public views."* **Did anyone from the CPUC/BLM visit the proposed Mill Site? There is an existing abandoned industrial facility at this proposed substation (Mill Site) and the entire area has been totally modified and disturbed.** The ground is totally scarified and no mature native vegetation remains. There is an existing substation at the Mill Site, an apparent remnant from the former lumber mill. GP. 148-9

- **How can the CPUC/BLM say that the degradation and destruction of a pristine area (Devils Garden Substation Site) will have less impact than the construction of another substation adjacent to an existing substation at the Mill Site?** The biological impact description (pg ES-22) and cultural impact assessment (pg ES-25) state greater impacts for Segment A than for Segment B. These facts are inconsistent with the conclusions derived in the DEIR/S. **Therefore, Segment B and the Mill Site Substation are clearly the environmentally preferred alternatives, instead of Segment A and the Devils Garden Substation site.** And other sites/routes may exist that are even more environmentally superior, but have not yet been explored or studied.

- I disagree with the statement on page ES-28 (Geology, Soils, and Paleontology) that says, *"The alternative Alturas Substation site (Mill Site) would result in slightly greater impacts than the proposed site because additional erosion,*

Alturas Intertie Project–Sierra Pacific Power Company
CPUC Application No. A93-11-018 & BLM No. CACA-31406
Page 7 of 10 June 1, 1995

siltation, and pollution could occur." How can that be? From on-site inspections that I have made, the Mill Site appears to be totally disturbed with coarse gravelly soils that would not erode, whereas the Devils Garden Substation site is totally pristine, and appears to be scattered bedrock outcrops, but mostly heavy clay soils that would easily erode and pollute Daggert Canyon. GP. 148-9

- I disagree with the statement on page ES-30 (Hydrology) that says, *"The Alternative Alturas Substation site (Mill Site) would have additional hydrological impacts to that of the proposed site because it is located in lowlands."* The Mill Site is an existing abandoned industrial lumber mill site. How can that compare to the hydrological impacts of developing the pristine Devils Garden site?

- I disagree with the statement on page ES-34 (Noise) that says, *"Vehicles used in maintenance and inspections, and repair activities would also produce non-significant noise levels."* This is very questionable, as a standard technique is for a utility to overfly its facility with low-to-the-ground helicopter inspections. The noise intrusion of frequent helicopter overflights is **not non-significant!** GP. 148-10

MISCONCEPTIONS IN THE LAND USE STUDY

- I believe the statement given on page ES-31 (Land Use, Recreation, and Educational, Religious, or Scientific Uses) is incomplete and therefore inaccurate when it says, *"Operating the Proposed Project would result in significant, non-mitigable degradation of the quality of residential uses as a result of a permanent change in the character of the residential environment due to the visual impacts of the project structures and EMF concerns."* **It is an incomplete and therefore inaccurate thought because the significant, non-mitigable degradation also occurs to open space lands, recreational lands, rural lands, open space lands, and agricultural lands.** This is a fatal flaw in the Land Use Analysis. GP. 148-11

- I totally disagree with the next sentence on page ES-31 that says, *"Designing the Proposed Project such that the transmission line structures are not placed within 300 feet of existing residences is proposed to partially reduce this significant impact."* As stated earlier in this letter, this proposed 300-foot separation for EMF is ludicrous and precedent-setting! Many existing transmission lines occur within urban areas throughout our Nation, all of which are closer than *"300 feet from sensitive receptors."* **Does the CPUC/BLM suggest that these urban transmission lines will no longer be acceptable in California or in the United States?** Will other utility companies support this 300-foot separation created by SPPCo's concerns for EMF? GP. 148-12

- Page ES-32 states, *"Non-significant land use impacts of operating the Proposed Project include: disturbances to residential and recreational uses during maintenance of the line (e.g., increases in noise, dust, odors, and traffic); degradation of the quality of recreational uses as a result of a change in the character of the recreational environment due to the visual impacts of the* GP. 148-13

Alturas Intertie Project–Sierra Pacific Power Company
CPUC Application No. A93-11-018 & BLM No. CACA-31406
Page 8 of 10 June 1, 1995

structures and their interference with recreational activities..." I strongly disagree! How can these visual impacts be **significant, non-mitigable** for residential users as described on page ES-31, and yet, be **non-significant and mitigable** for **residential and recreational users** on page ES-32? **This is totally inconsistent, totally illogical, and another example of the magnitude of fatal flaws in the DEIR/S.** GP. 148-13

MISCONCEPTIONS IN THE TREATMENT OF EMF

- Throughout the DEIR/S, the treatment of electrical and magnetic fields (EMF) seems inconsistent, and therefore, **precedent setting**, with regard to previously approved electrical transmission projects in the United States, current EMF research findings, and current CPUC policy. GP. 148-14

- There is a clear intent throughout the document to keep all project facilities 300-feet or more from existing residences. This bias to separating residences and transmission facilities by 300-feet is not based upon scientifically established facts or studies. **From this time forward, will the CPUC subject other utility companies to this same 300-foot criterion?** GP. 148-15

VISUAL RESOURCES

- On page ES-32 and elsewhere, the DEIR/S states that **significant, non-mitigable visual impacts** will be partially reduced by placing transmission line structures 300-feet or more from existing residences. Is the CPUC/BLM suggesting that the visual impacts are only visible from 300-feet or less, and if viewed from more than 300-feet, they are not significant and less degrading to the visual environment? If so, this is totally false.

- In the early 1970s, the Forest Service first developed a detailed system for Visual Resource Management. It defines distance zones for analysis of visual impacts. These distance zones are:
  Foreground: Zero to one-half mile
  Middleground: one-fourth mile to 5 miles
  Background: 3 miles to infinity.
  Several years later, the BLM modified the Forest Service Visual Management System and adopted its own Visual Resource Management System. Nowhere in either the BLM or Forest Service Visual Resource Management Systems have distance zones been limited to only 300-feet! **This is another fatal flaw in the logic and evaluation criteria of the DEIR/S.** GP. 148-16

- Please note that the visual simulations for 24 key observation points displayed in DEIR/S Section C.13 did not limit the viewing distance to 300-feet. Why, therefore, does the DEIR/S text continually limit its impact assessment to 300-feet? The visual simulations clearly prove that all three distance zones–foreground, middleground, and background–are visible and impacted by this project. **This clearly demonstrates the flawed logic in the DEIR/S.**

Alturas Intertie Project–Sierra Pacific Power Company
CPUC Application No. A93-11-018 & BLM No. CACA-31406
Page 9 of 10 June 1, 1995

- I disagree with the statement on page ES-41 (Visual Resources), Section 4.12.2 Project Alternatives, that says, *"Alturas Area Alternative Alignment (Segment B). This alignment would result in significant, unmitigable visual impacts, due to its visual prominence in scenic views from major travel corridors and residential areas in the vicinity of Alturas."* This statement is incomplete: if there were only two alternatives (there are certainly more), then **visual prominence** and **visual absorption capability** should also be considered in evaluating alternatives. Segment B is closer to Alturas, however, Segment B is NOT skylined and Segment A is skylined and much more visible. The landform screening provided by the rolling hills along Segment B creates high visual absorption capability. However, for Segment A, the steep, rocky slopes and ridgetop alignment create a skylined view in a low visual absorption capability landscape that creates a Class I impact that cannot be mitigated in any way. If there are only these two choices, Segment A or Segment B (which is NOT the case), then Segment B is probably the environmentally preferred alternative. I would say that neither Segment A or Segment B is environmentally superior, as both are inferior alignments. **Therefore, a completely new tie-in point should be found for the SPPCo Project and the existing BPA line.** GP. 148-17

- I also disagree with the statement on page ES-42 (Visual Resources) that says, *"Substation Alternative Sites. The Alturas Substation Alternative (referred to as the Mill Site Alternative), would result in significant, unmitigable visual impacts. In comparison, the proposed Alturas Substation would result in adverse, but non-significant visual impacts."* **This is totally false and terribly misleading to any reader who has not visited both sites.** The proposed Mill Site is adjacent to an existing substation for an abandoned lumber mill in a landscape that has been totally modified by existing industrial uses. The Devils Garden (preferred) Substation Site is a natural landscape with a mountain bike trail and a designated scenic vista into pristine Daggert Canyon overlooking a scenic waterfall. How can the visual impacts be greater, significant, and unmitigable at the Mill Site, and yet non-significant and mitigable at Devils Garden? **These misleading statements about visual resources at substation sites are another example of the magnitude of the fatal flaws in the DEIR/S.** GP. 148-18

- I disagree with the visual simulations shown in DEIR/S Section C.13. Because of the clear direction given in the Modoc County General Plan and the Modoc National Forest Land Management Plan (which are being grossly violated by this DEIR/S), all new transmission lines should be placed in existing corridors. If this project is built, which it should not be, it will create a new corridor. **Therefore, all visual simulations should show two or three parallel transmission lines on the skyline, not just one!** GP. 148-19

- The people who wrote this DEIR/S obviously consider **long-distance vistas and open space** to be a resource of little value. However, just the opposite is true. Long-distance views and open space are extremely valuable to the psychological and physiological well-being of all people. Current research has substantiated this fact. I can make available to you copies of this research, if GP. 148-20

Alturas Intertie Project–Sierra Pacific Power Company
CPUC Application No. A93-11-018 & BLM No. CACA-31406
Page 10 of 10 June 1, 1995

you desire. The CPUC/BLM and SPPCo are obviously ignoring the crucial importance of long-distance vistas and open space in the site/route selection process for this project. GP. 148-20

CONCLUSION

- **Finally, why does the DEIR/S spend so much time and effort trying (unsuccessfully) to mitigate significant, non-mitigable environmental impacts, instead of simply selecting a route within or adjacent to an existing utility corridor that has less impacts?**

- **The entire project is fatally flawed in my opinion, and in the opinion of many others, including Modoc and Sierra County Boards of Supervisors and the Forest Service.**

- **I recommend and respectfully request that the CPUC/BLM deny this project and direct that a new (or supplemental) draft environmental impact report/statement be prepared. The new study must fully investigate in detail a new SPPCo transmission line within or adjacent to an existing utility corridor, instead of creating a new transmission line that destroys open space and long-distance scenic vistas throughout Northern California.** GP. 148-21

Sincerely,

Lee Anderson, ASLA

cc: Honorable Richard Careaga, ALJ, CPUC
Ed Hastey, CA State Director, BLM

OC

COMMENTS FROM ORGANIZATIONS AND CITIZEN GROUPS

Draft EIR/S Comment Sheet April 3/4/5 91

Proposed Alturas Transmission Line

Org./Citizen Groups Comment Set 1

Name: Gordon + Marilyn Dick
Affiliation: NOPE
Address: P. O. Box 1691
City: Alturas State: Ca ZIP: 96101
Phone: (916) 233-4421 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

Use existing corridor in Nevada + cut off the route through Sparks + ~~coming~~ come down north west of Sparks directly to Reno (OC 1-1)

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Mr. & Mrs. Gordon Dick
P.O. Box 1691
Alturas, CA 96101

May 25, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie (CPUC 93-11-018, BLM CACA 31406).

Dear Sirs,

In the Draft Environmental Impact Report it states that the majority of roads within the Project's right of way would be rehabilited. The Draft Environmental Impact Report also states that the line would be maintained by ground patrol, including tree trimming, etc. This is a conflict of statements as there is no means for ground maintenance if the roads within the right of way are rehabilitated. Please tell me how vehicles will be used to inspect the line when, according to the Draft Environmental Impact Report, there will be no roads! (OC 1-2)

Thank you,

Marilyn N. Dick

Marilyn N. Dick
Gordon Dick

RECEIVED JUN 05 1995

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RECEIVED APR 06 1995

Org./Citizen Groups Comment Set 2

April 4, 1995

Julie Halligan
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, Ca 94102

RE: Alturas Intertie
CPUC #A93-11-018

Dear Ms. Halligan:

We are greatly concerned over the impact the proposed 345 KV power line would have on the Alturas area (Segment A), and nearby cultural sites.

The Infernal Caverns Battlefield location (Segment C) is extremely significant because it is a small confined battle site in pristine condition. General George Crook's tour of duty in the West was significant of early settlement in the western history. The area also contains soldier's gravesites and is one of the most important battles in this area, especially to local Native Americans. The integrity of the area surrounding the battle site would be severely impacted by these power lines anywhere near this battlefield. OC. 2-1

In reference to C. 4-35, Impact 4, mitigation measure C-7, concerning the proposed powerline route (ei east of and below the rim). The context and setting of the whole site is not only to the East, but also to the West and above the rim! So according to SPPco's mitigation, it doesn't include the total site. Therefore, in reference to Table D.5-1 (Cultural Resources), the potential impact to the Infernal Caverns historical site is more severe than Class II. It should be a Class I because SPPco didn't take in the significance the whole setting of the site.

We support the use of the Nevada Alternative because it ties into existing corridors and cultural resources have already been mitigated. OC. 2-2

Also, basically in (Segment A) of the proposed powerline there have been numerous waterfowl (geese) and 6 Sandhill Cranes, nesting. The powerline will surely have adverse affects on wildlife and waterfowl in this area. OC. 2-3

Sincerely,

[illegible] Alturas Opposed

RECEIVED JUN 05 1995

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Elwood & Maria Cantrell
Affiliation: NOPE
Address: P.O. Box 113
City: Alturas, CA 96101 State: CA ZIP: 96101
Phone: (916) 233-2443 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

We are concerned about the impact the Transmission line, Segment A - Construction and final placement will have on wildlife in the area. Doggett Canyon and the surrounding country is a wintering area for Mule Deer. We have seen herds coming down into the meadows with their offspring. Most of the does had twins and we see this as a good sign, since Mule deer herds have dwindled. If these access roads are created to the powerline, there will be more human presence and also loss of habitat in the area. This is a pristine area for different wildlife and waterfowl. Also, the powerlines are deadly to how flying Snow Geese and Hawkers which are in this area most of the year. The Hawkers nest in the meadows below our house. We've heard them flying late at night - 11:00 pm. How will they avoid these power lines? The Sandhill Cranes are in the area and raise their young. Recently, 6 cranes were observed in the field. OC. 2-4

The Transmission line will also go right over the National Historic Beaver Trail which early settlers used as a short route to the West. This route went across the Sierra Nevada Mountains to newly discovered gold mines into the Sacramento Valley. The Emigrants were guided by Peter Lassen to pioneer the Lassen Trail 1848. We certainly feel because of the impact this Alturas Transmission Line will have to the area, SPPco should use existing Utility Corridors. They can tie into PPA in another area where the Utility corridor exists. Also, there were Native Americans who attended a NOPE Meeting and they feel they were not adequately represented concerning the impact to Cultural Resources. OC. 2-5 OC. 2-6

Elwood & Cantrell Sincerely, Maria K. Cantrell

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED APR 19 1995

Org./Citizen Groups
Comment Set 3

4/15/95

To all interested parties:

Regarding the proposed Transmission line project between Reno and Alturas: I am writing as a representative of the Comstock Arabian Association, a Reno-based Horsemens' club to oppose said project.

As an officer of the Organization, a Nevada Corporation, I am expressing the opinion of a majority of our membership: the construction of High Power lines through and around the area near the North and west of Peavine Mountain would interfere with our members' ability to use the trails and enjoy the natural beauty of the area.

Although I recognize the need for said improvements, I join the members of our organization in requesting that the planners seek another route, some distance from the Peavine site.

OC. 3-1

Thank you for your interest,

Bob Ramsey

Bob Ramsey
Vice President,
Comstock Arabian Ass'n.
Reno, Nv
PO Box 11020

Org./Citizen Groups
Comment Set 4

RECEIVED APR 19 1995

April, 16, 1995

To whom it may concern,

It is my understanding that Sierra Pacific Power Co. intends to develope a sub-station near Bordertown in Washoe County, Nevada. And, that access to the Peavine Mountain area will be severely restricted.

As an Equestrian and longtime Endurance Rider, I wish to voice my objection to the closure of this area. In the past, there have been both 50 and 100 mile Endurance riding events that have used the trails on Peavine Mountain. Many pleasure riders, hikers, and other outdoor recreationalists use them as well. Please re-consider the use of this valuable recreational area. OC. 4-1

Sincerely,

Michaele Tristram

Michaele Tristram
President, Nevada All State
Trail Riders
Member, American Endurance
Ride Conference

Org./Citizen Groups Comment Set 5

RECEIVED APR 1 1995

We, the undersigned, as residents of Anderson Acres, located near Red Rock Road and Highway 395 North, on Peavine Mountain, in Washoe County, Nevada, oppose any major changes that will negatively impact and affect our lives, lifestyle, and property values.

Furthermore, we believe it is our responsibility, as residents of Peavine Mountain, to help protect and insure that the people who live here, and others who come to visit and for recreation purposes, can enjoy this unique environment in safety and without fear.

We also believe that everything possible should be done to keep this natural, rare, scenic, and unspoiled part of Peavine Mountain, which includes meadows, forests, canyons, wildlife, wetlands, streams, ponds, protected and free from development and projects that will forever scar and change the environment and thus negatively impact our lives. OC. 5-1

These natural and native assets must be preserved for our children and for generations to come. We, the undersigned, submit this petition and state our complete and total opposition to Sierra Pacific Power Company's current plans, proposals and intentions to establish power lines, 100+ foot towers, construction roads, etc., as part of their 165-mile electric power line between Alturas and Reno, known as the Alturas Transmission Line Project.

We object to this proposed route for this massive project so near to where we live. As proposed, this project will be placed in our community without our consent and in defiance of our judgment. This project is a threat to the safety of people who use Peavine Mountain for recreational purposes and to the safety and well-being of our children. This project, as proposed, will be placed where our children are growing up and where our children play. This project, as proposed, will ruin the pristine beauty of our environment, threaten wildlife and sensitive wetland areas, scar the landscape of our community and negatively impact and change Peavine Mountain and our lives forever.

Date	Name	Address	Phone Number
April 20, 1995	John V. Sandoval	11050 Duffney Lane Reno Nevada	972-6369
APRIL 20, 1995	Robert E. Dahlgren	11105 DUFFNEY LN. RENO, NEV.	972-4070
4/20/95	Clarence Dahlgren	11005 DUFFNEY LN RENO NV.	972-7305
4-20-95	Jeri Stucke	11050 Longview Ln Reno NV	677-0439
4/20/95	Victor Zatarain Becky Zatarain	11395 Longview Ln.	972-0954
4-20-95	SCOTT PARSONS	2085 COPPERFIELD	927-6923
4-20-95	Tracy Kish	205 Copperfield Dr	677-1705
4-20-95	K Kish	205 Copperfield Dr.	

Org./Citizen Groups Comment Set 6

OC 6-1

We, the undersigned, Property Owners and Residents, are totally opposed to the Alturas Intertie Project. Listed below are just a few of objections to that project:

1. Inconsistent land use with residential development
2. Total degradation of the environment
3. Property will be devalued
4. Visual impact will be felt
5. Possible health hazard
6. Property owners were not notified as to project with said power lines between 110-130 feet with 340,000 volts of electricity running right through their back yards.

The property owners bought in Horizon Hills Subdivision for the beauty of the Peavine Mountains, with all of the amenities thereto. It is also not necessary to be running that kind of power line around or near any kind of subdivision and/or improved property.

Frank J Grayson Jr	2420 Kiowa, Reno, NV 89506
Colette D Grayson	2420 Kiowa, Reno, NV 89506
Jennifer Semphill	2490 Hopi Lane, Reno NV 89506
Curt Semphill	2426 Kiowa Way, Reno NV 89506
Gilbert Tapp	2417 Sioux Ct, Reno, NV 89506
Joy Tapp	2417 Sioux Ct, Reno, NV 89506
Shannon Nordstad	2465 Kiowa Way, Reno NV 8
Jon Nordstad	8155 Blackfoot Way, Reno, NV 89506
Trish Gunderson	8155 Blackfoot Way, Reno NV 89506
Howard Hamm	8185 Blackfoot Way, Reno, NV 89506
Nicole Ann Hamm	8195 Blackfoot Way Reno, NV 89506
Joe B Weller	8195 Blackfoot Way Reno, NV 89506
D M Weller	8125 Blackfoot Way Reno, NV 89506
Thos E Walters	8120 Blackfoot Way Reno NV 89506
Carole Walters	8035 Blackfoot Way, Reno NV 89506
Richard Simons	8035 Blackfoot Way Reno, NV 89506
Maureen L Simons	2450 Kiowa Way, Reno, NV 89506
[illegible]	2450 Kiowa Way, Reno, NV 89506
[illegible]	2460 Seneca Way, Reno, NV 89506
Cindy [illegible]	
[illegible]	
Nelda Horwell	
Don Anderson	2440 Seneca Dr, Reno, NV 89506
Joy Anderson	2440 Seneca Dr, Reno, NV 89506
[illegible] Barber	2365 Seneca Dr Reno, NV 89506
Shirley Bowden	2365 Seneca Dr Reno, NV 89506
Kathleen Berner	

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Ella R. Thomson	8071 Mohawk Dr. Reno NV. 89506
August Thomson	8090 Mohawk Dr. Reno, NV.
[illegible]	8052 Mohawk Dr NV
[illegible]	8030 Mohawk Dr. Reno NV
Mindy Bell	2250 Seneca Dr Reno NV
[illegible] Bell	2250 Seneca Dr Reno NV
David [illegible]	2230 Seneca Dr Reno, NV
Larry M. Mutalt	8030 Mohawk Dr Reno NV.
Jim Burnett	8110 Mohawk Dr Reno
[illegible]	8085 Mohawk Dr Reno
Joan E Cloyd	8115 Mohawk Reno
Joan E Cloyd	8085 Mohawk Dr Reno
Hilbert D. C Cloyd	8115 Mohawk Reno
Pamela J Wright	8055 Mohawk Reno
[illegible]	2210 Seneca Reno
[illegible]	2280 Dakota Reno
Rachel Lakocke	2280 Dakota Reno
[illegible]	2275 Dakota way Reno
[illegible]	2255 Dakota way Reno
[illegible]	2255 Dakota way Reno
[illegible]	2240 Dakota way Reno
Dennis J Emrich	2240 Dakota way Reno
[illegible]	2220 Dakota way Reno
[illegible]	2230 Dakota Way Reno
[illegible]	2220 Dakota way Reno
[illegible]	2225 Dakota way Reno

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NAME	ADDRESS
Ray Lokos Jr.	8315 Chippewa Ave
[illegible]	2210 Pawnee Wy
[illegible]	2210 Pawnee Wy
[illegible]	8385 Chippewa Ave
Ben R Forbes	8385 Chippewa Ave
[illegible]	8405 Chippewa Ave
Debby Burbos	8410 Chippewa Ave.
[illegible]	8410 Chippewa Ave
Mabel A Carnich	8460 Chippewa Ave
Raymond A Carnich	8460 Chippewa Ave
[illegible]	8475 Chippewa Ave
[illegible]	8366 Pawnee Way
[illegible]	8360 Chippewa
[illegible]	2430 Sauk Ct
[illegible]	2430 Sauk Ct
Eleanor A. Miller	2494 Hopi Ct.
Jim A. Miller	2494 Hopi Ct.
[illegible]	2496 Hopi Ct.
[illegible]	8160 Mohawk Ln
[illegible]	8205 Mohawk Ln
[illegible]	8200 Mohawk
Joe Peebler	8230 Mohawk Ln.
[illegible]	8050 Mohawk Ln
Denise J. Hugard	2210 Seneca Dr.

We, the undersigned, Property Owners and Residents, are totally opposed to the Alturas Intertie Project. Listed below are just a few of objections to that project:

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Alturas Tie IV

Ruth H Hoyt	2428 Haida Ct. Reno, NV
Loren Hoyt	2428 Haida Ct Reno NV
[illegible]	2423 HAIDA CT RENO NV 89506
[illegible]	2430 Haida Ct
[illegible]	2430 Haida Ct Reno NV 89506
[illegible]	2430 Haida Ct. Reno NV 89506
Paula Hoyt	2420 Mandan Way Reno NV 89506
Lee Wilber	2415 Mandan Way Reno NV 89506
Ken Swan	2425 Mandan Reno 89506
[illegible]	2445 Mandan Way, Reno, NV 89506
Mary Tolena	2445 Mandan Way Reno NV 89506
Brenda Cristani	2440 Mandan Way Reno 89506
Mary H Palmer	8180 Seneca Dr Reno 89506
William S. Palmer	8180 Seneca Dr Reno 89506
[illegible]	2235 Dakota Way Reno 89506
[illegible]	2295 DAKOTA WAY, Reno 89506
[illegible]	2490 HOPI W RENO NV 89506

Org./Citizen Groups Comment Set 7

25 Sierra View Road
Reno, Nevada 89506
April 26, 1995

Ms. Julie Halligan
505 Van Ness Avenue
San Francisco, California 94102

RE: Sierra Pacific Power Company
Alturas Transmission Line Project
CPUC # 93-11-018
BLM # CACA-31406

Dear Ms. Halligan

We are requesting a 15 to 30 day extension for the review period of the Reno-Alturas Transmission Line Project.

We live on Alternate Segment WCFG (the EIS preferred route), specifically on Sierra View Road, Reno Nevada. Regardless of which route is selected, our homes will be highly impacted and effected by this HIGH VOLTAGE powerline. In either case, WE WERE NOT NOTIFIED OF THIS PROJECT. OC 7-1

We need an extension in order to review the Environmental Impact Statement. It is unrealistic to expect someone to read, comprehend and make informed comments with only one week notice. We are active citizens and take our civil responsibilities seriously. We are asking the CPUC and the BLM to please give us that opportunity.

In addition, the most complex aspect of this project is that our property borders the California state line. Therefore, the routing alternatives are located in California and we are Nevada residents. OC 7-2

Thank you very much for any help that you can give us.

Sincerely,
Edward Anderson
Patricia Anderson
Edward Anderson
Patricia Anderson

cc: Nevada Consumer Advocate
Governor Bob Miller

The following people signed the form letter:

Sincerely,
Jeff Bond
Teri Bond
Jeff Bond
Teri Bond

Sincerely,
Cindy Branham
Cindy Branham
Bordertown Landowners

Sincerely,
Pamela Page
Chris Page
Pamela Page

Sincerely,
Charles Parrotto
Charles Parrotto

Sincerely,
Edward Silva
Kathryn Silva
Edward Silva
Kathryn Silva

Sincerely,
Connie Van Dyke
Connie Van Dyke

Sincerely,
Edwin West
Barbara West
Edward West
Barbara West

Sincerely,
Leo Wheatley
Janet Wheatley
Leo Wheatley
Janet Wheatley

Sincerely,
W. C. Wheatley
Jean T. Wheatley
W. C. Wheatley
Jean T. Wheatley

Lassen Sportsmens Club

736 PLUMAS ST ■ SUSANVILLE, CA 96130
(916) 257-3794

"Dedicated to secure and maintain the rights of sportsmen and preserving wildlife"

Org./Citizen Groups Comment Set 8

April 25, 1995

Julie Halligan/Pet Humm, CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca. 91301

REF: Sierra Pacific Power Company
Alturas Transmission Line Project.
CACA-31406
CPUC 93-11-018

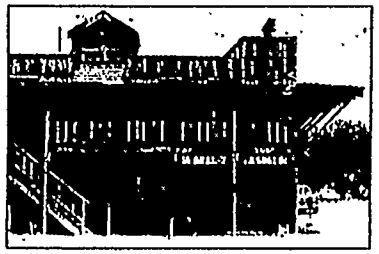
Dear Ms. Halligan and Mr. Humm:

Thank you for this opportunity to respond the environmental study for this project. After careful review and deliberation of the executive summery it appears that the No Project Alternative is the only acceptable option and our Club wishes to support the No Project Alternative. This power line will create long term, unmitigatable environmental damage to thousands of acres of public and private lands to provide for the uncontrolled growth of the Reno basin. The only real adverse effect of the No Project Alternative is, and I quote from page ES-38, Section 4.10.2, paragraph two, "In the Reno area, a shortage of electricity could restrict future growth rates." "Could" restrict future growth rates. This hardly compares to the "significant" and "Unmitigatable" impacts addressed in this study, not to mention the questionable mitigation measures which this study says will reduce some of the residual impacts to "Not insignificant". OC. 8-1

In several sections of this summary where the No Project Alternatives is addressed there are statements such as, "similar impacts would be realized in other areas as the applicant augments their existing system", or "similar impacts would occur in different locations to those described above", and etc. These kinds of statements smack of what we would call "sham" environmental comparisons. Using this type of comparisons one could say that a train wreck is similar to a car wreck. The real question which this document has not addressed is, "if SPPCo augments their existing transmission system(s) with a new project, will the impacts and environmental damage already done by their existing system(s) minimize and/or reduce the new impacts such that a new project using the existing systems is fact environmentally superior to their proposed project" Why impact a raw virgin environment when you can accomplish the same goal by utilizing an existing easement? It would appear that SPPCo picked this project because it will bring them cheap power, will be cheaper to build, and will give them excess power to sell to other users in California. Who will really benefit from this proposed project?? Not the wild life, not the owners of the lands through which the lines will traverse, not the current or future residents of Lassen County, and certainly not the wonderful environment which this project will significantly degrade. Only the electricity gobbling Casino's, Hotels, Motels, Convention Centers, and SPPCo will benefit!!! Our club, which is dedicated to the preservation of our wildlife and natural resources hope that you will agree with this assessment and make the finding that the No Project Alternative is the appropriate Alternative. OC. 8-1

Sincerely,

John R. Gaither
President



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Good Real Estate

RECREATION AND RANCH SPECIALISTS

Org./Citizen Groups
Comment Set 9

April 25, 1995

Julie Halligan/Pet Humm, CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca. 91301

REF: Sierra Pacific Power Company
Alturas Transmission Line Project.
CACA-31406
CPUC 93-11-018

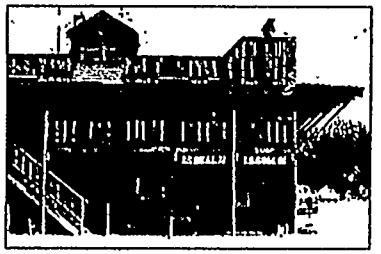
Dear Ms. Halligan and Mr. Humm:

I am writing on behalf of several of our clients who own property in the Long Valley area of Lassen County. Most of them own property in Section 36, T22N, R17E. My clients are, for the most part, opposed to this project going through Long Valley. This line will spoil the scenic value of the entire area and their properties. Additionally, the original preferred route would go right through the middle of Section 36 and several 20+/- acre parcels. My clients are unanimous in their opposition to the original route and "IF" this project must go through Long Valley they would like it to be put on the west side of the Valley. If it must go on the East side of US Highway 395 then alternate "Z" is the only acceptable route. We appreciate the opportunity to give input into this project. OC. 9-1

Sincerely,

John R. Gaither
Associate

2055 MAIN STREET • SUSANVILLE, CALIFORNIA 96130 • (916) 257-5347



Good Real Estate

RECREATION AND RANCH SPECIALISTS

RECEIVED MAY 3 0 1995

May 25, 1995

Julie Halligan/Pet Humm, CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca. 91301

REF: Sierra Pacific Power Company
Alturas Transmission Line Project.
CACA-31406
CPUC 93-11-018

Dear Ms. Halligan and Mr. Humm:

I am submitting an amended letter on behalf of several of our clients who own property in the Long Valley area of Lassen County. Most of them own property in Section 36, T22N, R17E. My clients are, for the most part, opposed to this project going through Long Valley period. This line will spoil the scenic value of the entire area and their properties. The benefits of this project cannot out weigh the damage it will do to Long Valley. Additionally, the original preferred route would go right through the middle of Section 36 and several 20+/- acre parcels which is all privately owned. My clients are unanimous in their opposition to the original route. "IF" this project must go through Long Valley they would like it to be put on the East side of the Valley up against the Petterson Mountains and, at the very least, "IF" it must go along the prefered route on the East side of US Highway 395 then alternate "Z" is the only acceptable route. My clients wish to state that they are not against needed Public Utility projects but feel this priject is not in the Public's best interests. We appreciate the opportunity to give input into this project. OC. 9-2

Sincerely,

John R. Gaither
Associate

2055 MAIN STREET • SUSANVILLE, CALIFORNIA 96130 • (916) 257-5347

Draft EIR/S Comment Sheet RECEIVED MAY 0 3 1995

Proposed Alturas Transmission Line

Org./Citizen Groups Comment Set 10

Name: Don Prather

Affiliation: N.O.P.E. - Neighbors Opposing Powerline Encroachment

Address: P.O. Box 681

City: Alturas State: CA ZIP: 96101

Phone: (916) 233-5395 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

The Alturas Transmission Power Line Project has many flaws.

It has been studied and found that small children living near power lines ARE more apt to be infected with Leukemia than small children living away from power lines. While agencies will not admit that power lines are the reason, they will not admit that they aren't. OC. 10-1

How many children will it take for you to make a conclusion??? One?? 10?? 100??

I say if you are willing to sacrifice one child, you are as guilty as any war crimes criminal for disregarding the apparent problem you are causing.

The only way to provide power to an area is to take it along a route with NO children or people subject to EMF, as is the Nevada Alternative.

If Nevada wants the power, they should explore all alternatives, such as Nuclear Power, or only exposing their own population to the exposures that are evident, but not admitted to by the CPUC, BLM and Aspen.

Your apparent goal is to take away our property in Modoc County, our values, (scenic, land wildlife, health, & welfare) to satisfy the needs of Nevada.

You already know the obvious way to supply them their needs over routes already studied. OC. 10-2

I urge you to realize your duties, read your own DEIR and take the Nevada Alternative.

Your DEIR Vol I & II are full of conflicting statements and double talk.

While millions of dollars have been spent studying EMF, your last word is " We can conclude that no conclusion be concluded because nothing conclusive can be concluded." I can only look at you with contempt and feel sorry for your waste of knowledge and judgement, and your conclusions.

Very sincerely, Donald W. Prather

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED

Org./Citizen Groups
Comment Set 11

April 27, 1995
Draft EIR/S Comment Sheet Re: Proposed Alturas Transmission Line

James J. Brown
Affiliation: N.O.P.E.
HC04 Box 42500
Alturas, CA 96101
916-233-4474 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

Sierra Pacific's 345 KV Alturas Transmission Line seems to be an incomplete line, as it's source at Alturas is a wood pole 230 KV line that cannot be upgraded.

As Sierra Pacific becomes committed with new load at the Reno end, their share of power from the 230 KV line at Alturas, being only 20%, will become inadequate.

What are their plans for this problem in the future ? Do they plan to continue the 345 KV line over the Devils Garden to the Malin, OR. substation to connect directly to 345 KV ? I do not believe any future plans have been addressed, as this line extention is inevitable. OC. 11-1

Stepping the 230 KV up to 345 KV does not make more electricity, it only increases the voltage, not the amperage or load.

When the 345 KV is reduced at the Reno end, the distribution load cannot exceed the amount of Kilowatts drawn from the 230 KV line. It does not seem practical to build such an expensive 345 KV line to a 230 KV source, of which they can only draw a fraction of power from, as this 230 KV line must supply the Alturas area.

What are we not being told of future construction across the Devils Garden ? OC. 11-2

The continuation of the 345 KV line, which is inevitable, has not been addressed or studied for accumulative impact across the Devils Garden.

Construction of the 345 KV Alturas Intertie will create a new corridor, as stated in Sierra Pacific Power Company's information, handed out at the first open house meeting at Alturas. OC. 11-3

Quote Sierra Pacific, "The Alturas Intertie may provide a pathway for other Utilities and independent power producers to deliver electricity to their customers."

The Alturas Intertie Line will create access road near the Infernal Caverns area, future additional line will create even more access roads, and scar this historic area even greater. This should not be allowed to happen. OC. 11-4

The Pit River Valley is a flyway for local and Migratory birds. Federal funds created and support the Modoc National Wildlife Refuge to attract and support local and migratory birds. OC. 11-5

It is a conflict of our best interest to support the refuge, then let transmission lines come across the Valley, as power lines are the #1 killer of migratory birds.

It is disappointing to see the Public Service Agencies involved considering their own interests first.

Very sincerely,

James J. Brown

cc Randy Sharp
Modoc National Forest

Peter Humm
BLM - Susanville District

Org./Citizen Groups Comment Set 12

April 27, 1995

Draft EIR/S Comment Sheet Re: Proposed Alturas Transmission Line

Sharon J. Brown
Affiliation: N.O.P.E.
HC04 Box 42500
Alturas, CA 96101
916-233-4474 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

I am finding that studies are still not conclusive as to whether electromagnetic fields pose any health risk, and if so, what aspect of the field is harmful.

In reading that according to the Dept. of Health Services, at this time no one knows the relative importance of average long term exposure, exposure to sudden high intensities, exposure to different frequencies or various combinations of all three with other factors

I find that research by the Dept. of Health Services is still on going with no conclusions. And their studies have shown that increased cases of cancer may occur in locations that have high magnetic fields.

We cannot presume EMF is safe until proven unsafe.

The Utility has to prove it's safe. If they can't prove it's safe - they shouldn't get the line or substation.

Why should a private investor owner entity take property and subject people to harm??

A very large percent (80% to 90%) of research into EMF has been funded by the electric companies, or by EPRI (Electric Power Research Institute.)

This is a clear case of conflict of interest!!

Studies that are funded by some source other than the electric industry are remarkably consistant in showing a significant correlation between exposure to magnetic fields and specific types of cancer.

The studies provided very strong scientific evidence of serious health effects from exposure to these fields.

There is a real problem in the study of health effects relating to measuring exposure in terms of field strength and duration.

You would think - the higher the dose, the greater the risk.

This is NOT always the case with electromagnetic fields according to laboratory evidence.

Biological effects appear at field strengths of certain levels, then disappear at higher levels - only to re-appear at still higher levels.

OC 12-1

Most of the studies have not involved prolonged measurements of field exposure on proximity of homes to power and distribution lines.

And these studies do not tell us the biological importance of the duration of exposure, the number of times there are high exposure, the presence of certain frequencies, or other physical aspects of the fields.

And the studies are continuing, and scientists are finding that the magnetic and electric fields can produce changes in the levels of specific chemicals the body makes, and changes in the functioning of individual nerve cells and the nervous system of animals. And it is still not clear if these changes can lead to an increase in risk to human health.

Also, studies have raised the possibility of emotional, behavioral, and reproductive effects. And the greatest concern is epidemologic studies showing a statistical association with cancer.

In my reading I find the epidemologic studies show results between cancer occurrence and exposure to electromagnetic fields.

And I read that Swedish studies concluded that four times the incidence of Leukemia was found in people living or working near EMF, which they feel proves a high probability that EMF causes cancer.

They say even low frequency EMF can cause cancer, and the frightening thing is the unknown risk.

Dozens of studies have proven there is a danger, living or working near transmission and/or distribution lines.

Does the energy that can move a compass needle affect our health ? Most studies say YES!!

After all of my studying about this issue, it seems that government and utilities have been for quite some time trying to hide facts that EMF is deadly and can cause cancer such as Lymphoma, Hodgekins and other cancers.

Think about this, and wonder why the Calif. Dept. of Education adopted a policy of minimum distance between new schools and the edge of rights-of-way of transmission lines.

Much more research is needed to answer many valid questions and uncertainties, and that must be resolved in order to develope a sound public policy.

Even the Science Advisory Board Subcommittee believes the EMF effects on biological systems is important and should be further studied by the EPA (Environmental Protection Agency), and their report should be rewritten, and then it should be reviewed by the Science Advisory Board.

There are many, many quotes by many specialists from many walks of life all saying relatively the same thing, "EMF is a major health problem."

OC 12-1

-3-

Even the utility industry commissioned it's own study to try to repudiate these conclusions, and it couldn't!!

It was a $5 million study, and the utility industry could not prove the conclusions were wrong.

The U.S. Environmental Protection Agency published a review of the studies and the conclusion reached is that such exposure is a 'probable' carcinogenic risk factor.

Under pressure from the government, the word "probable" was changed to "possible" in the final draft of the report. They were concerned about how the public would react to the news.

According to Barbara Klein, public information manager for the utility industry-funded Electric Power Research Institute in Palo Alto:

> "The main branch of science is saying we need to do a whole lot more research before we can say there is absolutely no danger."

"Utilities are not dealing with this as if it were a medical problem, but as if it were a public relations perception to be altered by fancy brochures and paid advertising," quoted from Paul Brodeur, writer for N.Y. magazine, and author of "Currents of Death," a book on EMF.

Brodeur states that economics, rather than science, will be the decision maker to the problem.

Lab experiments have established that EMF does produce measurable physiological effects in humans, including changes in calcuim flow from cell membranes, which can affect cell division and reproduction.

The Swedish National Board for Industrial and Technical Development said there is a connection between exposure to power-frequency manhetic fields and cancer.

My own investigation of this show that most studies still remain unresolved as to the wire code:

1. Measured electric field
2. Measured magnetic field
3. Wiring configuration

Everywhere I found valid information, it all said the very same thing:

"Studies remain unresolved as to potential health hazards."

Every study said that health hazards regarding the delivery and usage of electric power are incomplete and inconclusive.

A five year $65 million study is still underway in a joint effort by the Dept. of Energy and the National Institute of Environmental Health Sciences to understand how EMF affects human cells.

OC. 12-1

-4-

Utility companies should use alternative methods of transporting power until there is conclusive evidence that neither man nor his environment will be in any way harmed.

Until we have the necessary information, we should adopt a prudent avoidence. Limit exposure!! Scientists still don't know for sure.

So --- until a conclusion --- why take the risk ???

OC. 12-1

Sincerely,

Sharon Brown

cc Randy Sharp
Modoc National Forest
800 W. 12th
Alturas, CA 96101

Peter Humm
BLM Susanville District
705 Hall St.
Susanville, CA 96130

RECEIVED MAY 0 1 1995

April 27, 1995

Julie Halligan/Peter Humm
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie, CPUC #A93-11-018, BLM #CACA-31406

Dear Ms. Halligan and Mr.Humm,

Something I must mention is that after reading and re-reading the DEIR/S, I cannot find where it adequately addresses alternative routes.

The DEIR/S addresses the proposed Project, which creates a new corridor. However, the National Forest Plan specifically states that existing utility corridors by used. Even the Forest Service has studied this and set aside such corridors. And knowing this, some of us have built our lives and livlihood with this in mind.

This new proposed corridor on Devil's Garden is something I object to strongly as it is not in our (the public) best interest, and not in the best interest of the Forest Service, and is only in the best interest of the stockholder owned utility company. OC. 12-2

It is evident that proper studies have not been done into alternate routes.

Also, I would like an explanation as to why there was absoutely no local announcement of the last Hearing in Alturas for Public Participation on the DEIR/S, held on April 17, 1995, from 6 to 9 p.m. at the Alturas City Hall.

There was an article mentioning it in the Klamath Falls, Oregon,Herald & News, but nothing in our own local newspaper. Therefore, many residents who would have participated in oral comments, did not know of this Hearing, and were not in attendence. OC. 12-3

Why was this important Public Participation Hearing mentioned in an Oregon newspaper, and not one mention of it was in our Alturas newspaper ?????

Sincerely,

Sharon G. Brown

cc Peter Humm
BLM - Susanville District
705 Hall St.
Susanville, CA 96130

Julie Halligan
CPUC
505 Van Ness Ave.
San Francisco, CA 94102

Randy Sharp
Modoc National Forest
800 W. 12 St.
Alturas, CA 96101

RECEIVED MAY 0 5 1995

Org./Citizen Groups
Comment Set 13

May 2, 1995

Aspen Environmental Group
California Public Utilities Commission
U.S. Bureau of Land Management

RE: Comments on Draft EIR/S Alturas Transmission Power Project

These comments are offered by " Friends of Peavine", a non profit tax exempt organization composed of individuals and agencies, both private and public. The mission of "Friends of Peavine" is the "Enhancement and restoration of Peavine Mountain". Toward that mission we have in cooperation with the American Lands Conservancy, purchased 8,600 acres of private land on Peavine Mountain and have reverted it to public ownership under the administration of the U. S. Forest Service.

Our concern is with that portion of the transmission line that traverses the lower slopes of Peavine Mountain from the California-Nevada border South to No. McCarren Blvd in Reno, Nv. Of particular emphasis is that line segment designated "Y" and "X-East".

As a broad statement it is our desire that proposed alignment remain as closely as possible to existing utility corridors and not creep up the mountain into previously undisturbed areas. Further we ask that sincere consideration be given to burial of the existing power lines within that corridor.

The draft EIR/S appears to adequately address the need to protect existing resources on the mountain, from cultural sites to vegetation. Care should be given to prevent the further building of roads that would tend to become permanent . Because of recreational use from four wheel drive to mountain bikes, roads and trails are increasing at an alarming rate. there is a particular need to insure that all construction routes are removed, recontoured and revegetated. OC. 13-1

Numerous springs and intermittent water courses exist along the proposed route within segment "Y" and "X-East". There does not appear to be any significant effort to identify their location. This should be done so that water for wildlife is adequately protected. OC. 13-2

Peavine Mountain once supported many more trees than exist today. Many believe that logging without replanting led to this situation. In those areas where the power line will cross or go through stands of ponderosa and jeffrey pine, quaking aspen, willow and other shrub species it would be reasonable mitigation to plant additional trees and shrubs to support the enhancement of the mountain. "Friends of Peavine" in cooperation with Billinghurst Middle School has been active in planting trees and shrubs on the mountain. OC. 13-3

Segment "Y" impacts three sites of cultural resource. Please describe and locate them for us and explain their significance. Are they in the vicinity of Poeville, a townsite dating from 1870? OC. 13-4

With respect to visual resources; if we must look at towers and power lines, then make it as few as possible. Again we suggest that existing poles and lines within the utility corridor be buried as a part of mitigation. The newly constructed towers could be painted to blend with the existing natural vegetation and ground colors. Tree and shrubs could be planted near the bases so as not to be obtrusive at the height of normal gazing. The proposed alignment could use existing hills to sometimes hide the power line from view. Also as an additional thought of mitigation a portion of the construction resources could be used for a general clean up of existing debris on the mountain. Years of illegal dumping has resulted in acres of unsightly and potentially hazardous waste piles in the vicinity of urban areas. Of particular concern are areas just to the south of Raleigh Heights, and also on both sides of the Bell Telephone access road to the mountain summit. OC. 13-5

-3-

To best address our concerns we request an on site examination of the areas mentioned, as well as the entire route as it traverses the foothills of Peavine Mountain to be attended by members of our group and knowledgeable members of your respective staffs. OC 13-6

Sincerely,

Kirk Odencrantz By
Kirk Odencrantz

Kirk Odencrantz, President
Friends of Peavine Inc.
3780 St. Andrews Drive
Reno, Nevada 89502
(702) 857-6840

Org./Citizen Groups
Comment Set 14

April 27, 1995

Sierra Pacific Power Company,
Bureau of Land Management,
California Public Utilities Commission.

As an owner of a parcel in the Secret Valley Ranch Subdivision #2, I am hereby voicing my concerns about the proposed route through Secret Valley. (OC. 14-1)

Because the winds almost always blow from West to East in this area, and because of the increased risk of fire, I am requesting that the Secret Valley Ranch Alternative Route be used for the construction of this power transmission line.

I also feel that the lines as originally planned will detract from the natural beauty of the entrance to my land, and possibly lower my property value. (OC. 14-2)

Sincerely,

Nancy Hawley
P.O. Box 75
Litchfield, CA
96117

MAY 1 1995

The following people signed the form letter:

Joe Faragosa

Ronald P Macri

Steve Ondry
Sharon A. Del Grosso Ondry

J. B McCESTER

RECEIVED MAY 1 9 1995

Org./Citizen Groups
Comment Set 15

May 10, 1995

Julie Halligan/Peter Humm
CPUC\BLM
c\o Aaspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Ms Halligan and Mr. Humm;

I am a resident of Reno with friends living in Long Valley. I care passionately about the beauty of this valley and want to see it preserved for us and future generations as well as all the people that drive through Long Valley to get to the Toiyable National Forest. We also care about preserving the habitat of all the animals that live here including deer, coyotes, raccoon, porcupine, bobcats, squirrel, chipmunk, rabbits and a wide variety of birds and water foul.

Sierra Pacific Power Company proposes to build a substation that will be a hub for high voltage transmission lines through Long Valley. This will destroy the beauty of our valley, so please support Sierra County's decision to object to the Bordertown substation because it will effect the Washoe County border. Also, please support the use of existing corridors so the citizens of northern Washoe County will not be affected.

OC 15-1

Sincerely,

Janet Zebrack

Janet Zebrack
85 Kirman Ave #200
Reno, NV 89502

The following people signed the form letter:

B Poore
971 Ashwood Cir
Sparks, NV, 89434

Ann D. Turner
4493 Carisbrook Ln
Reno, NV 89502

RECEIVED MAY 1 2 1995

Org./Citizen Groups
Comment Set 16

May 7, 1995

Julie Halligan\Peter Humm
CPUC|BLM
C|O Aspen Environmental Group
30423 Canwood Street, Suite 218

Dear Ms Halligan and Mr. Humm:

I am adamently opposed to the installation of an enormous substation and high voltage power lines scaring forever the beautiful Long Valley. My family and I have been driving through Long Valley for years to reach the Toinby National Forest. This is a wonderland for hiking, mountain bicycling, and camping. A substation would forever destroy the pristine beauty of this georgeous land that is only half an hour from the citizens of Reno. OC 16-1

The choice is profits for Sierra Pacific Power, or the long term bennefits to the many citizens of the North Valley and Reno. Please deny SPP a permit to build a substation in Long Valley and high voltage power lines along Hwy 395 into Reno. I support the use of existing corridors East of Reno.

I am writing in refference to CPUC Application Number (93-11-018) and BLM Case Number (CACA-31406)

Sincerely

The following people signed the form letter:

Sincerely yours,
Robin Pinski

Sincerely yours,
Susan Wheeler

Sincerely yours,
Betty A. Thornton

Sincerely yours,

Sincerely yours,
Richard Swedin
Jeannie Swedin

Sincerely yours,
Renée S. Parigly

Sincerely yours,
Kristine M. Gregory
Debra A. Olson

Sincerely yours,
Phyllis D. Gladding
Phyllis D. Gladding

Sincerely yours,
George A. Zatarain MS

The following people signed the form letter:

Sincerely yours,

Sincerely yours,

Sincerely yours,

Sincerely yours,

Sincerely yours,

Sincerely yours,

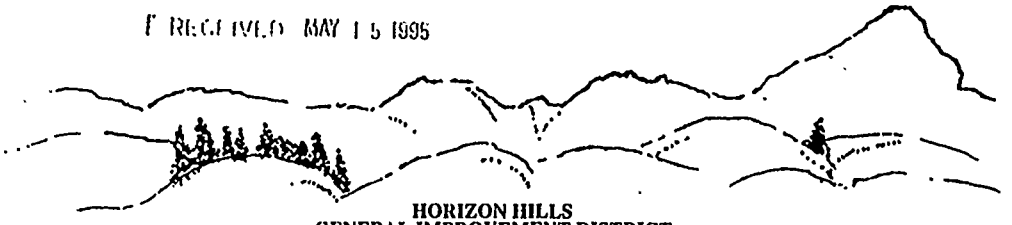
Sincerely yours,

Sincerely yours,

Sincerely yours,

Sincerely yours,

RECEIVED MAY 15 1995



HORIZON HILLS
GENERAL IMPROVEMENT DISTRICT

P.O. BOX 60401
RENO, NEVADA 89506
PHONE (702) 677-1174

Org./Citizen Groups Comment Set 17

May 10, 1995

Ms. Julie Halligan - California Public Utilities Commission
Mr. Peter Humm - Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood St. #218
Agoura Hills, CA 91301

RE: FORMAL PROTEST OF THE ALTURAS 345KV POWERLINE
CPUC Application Number 93-11-018 and BLM Case Number CACA-31406

Dear Ms. Halligan and Mr. Humm:

We are writing today on behalf of the Horizon Hills General Improvement District and the residents and property owners that we represent to issue a formal protest of the planned routing of the Alturas 345KV powerline as we feel we will be greatly impacted by this routing decision. We are surprised and greatly disturbed at the lack of alternative routes presented in the EIS/R.

Horizon Hills is an isolated and unique community located on the eastern slope of Peavine Mountain, west of old U.S. 395. This development has been here for over 30 years, and consists of 165 1/2 acre lots and approximately 400 residents. To our utter dismay, we have only recently found out that Sierra Pacific and the CPUC plan to route the Alturas 345KV powerline directly in our 'backyard' and on the eastern flank of Peavine Mountain. The powerline will come within 2000 ft. of our community water tank, within 2500' ft. of several residences, and will substantially impact the aesthetic and recreational aspects on the Forest Service land directly behind us. OC. 17-1

We wish to issue formal protest on the following specific grounds:

1) As a point of issue, we, Horizon Hills General Improvement District, a quasi-municipality corporation, were never informed of the potential impact to our community or of the direct proximity of the project to our community since the inception of this project. We only 'found out' through hearsay, with the first public hearings in March, even though the proposed line comes within 2000 ft. of our water tank. This is simply not acceptable and we feel OC. 17-2

deceived.

2) As a result of the two public hearings in March and April, many of our residents have gotten involved, attended the meetings, and are expressing anger, distrust, and concern over the proposed routing of the powerline, for the following reasons.

a) Everyone who has purchased property in the Horizon Hills General Improvement District did so because of the rural and aesthetic aspects of the location, knowing full well that we were bordered to the south and west by Forest Service land. Peavine Mountain, particularly the area behind Horizon Hills, is a pristine wildland environment, whose integrity would be compromised, aesthetically and recreationally by the magnitude of a 345KV powerline. OC. 17-3

b) Additionally, there is concern about the impact to property values if a project of this magnitude goes through as it will be clearly visible from every home in the District. We feel that as a small community of moderate means, we cannot absorb the impact of this project without severe and long term loss. OC. 17-4

c) Our residents are concerned about the invasion of our lifestyles, the invasion of our peace and quiet, by having 345KV lines whistling in the wind. Winds in the area generally come from the SW and are commonly and regularly above 50 mph and often over 100 mph. OC. 17-5

d) We are concerned greatly for the integrity of the mountain itself and for future land use appropriations should this powerline go through. If the Forest Service allows for a corridor, the land would be compromised as recreational use and could lead to future give-aways by the Forest Service. OC. 17-6

e) Re: the recreational impact: Peavine Mountain is fast becoming a major recreational use area for hikers, mountain bikers, hunters, and off-road vehicle users from the nearby Reno urban area, as well as for the residents of Horizon Hills. Two major points of access to Peavine Mountain are through Horizon Hills: at the end of Seneca and on Kiowa. Many people access this area to spend time at two stock ponds on the lower flank of the mountain. The center line of the powerline will span the riparian/creek environment just above the first pond. Additionally, this particular span passes within 100 ft. of an active Golden Eagle nest which has a breeding pair producing 1-2 fledglings per year for the past several years. This close proximity to the riparian zone and to the eagle nest is simply not acceptable. Also, the foothills area under the proposed powerline is a significant breeding territory for Meadowlarks, who return each year in April in large numbers. OC. 17-7

f) Although at some distance from our homes (approximately 2300'), there is still significant concern about the potential health impacts to our neighborhood through the EMF generated by such a OC. 17-8

high voltage line. And even if the proximity to homes is not that great, persons recreating in the area will be impacted by EMFS regularly every time they walk under the lines, ride their horses, and in general pass through the area. OC. 17-8

Additionally, we understand that 'noise along the transmission line during operations would be produced by corona discharge in wet weather.' Horizon Hills, at an elevation of 5500', often has more wet weather than Reno, whose elevation is 4500'. We have heard that the noise from a 345KV line may be as much as 40 decibels. OC. 17-9

g) Also, we have concerns about interference that this magnitude of current might have with radio and television reception and any other signals which come over the mountain from Reno. OC. 17-10

Additionally, we are concerned about potential air/space impacts. We would like to note that the Washoe Medical and St. Mary's Care Flights route to the North Valley's and north to Susanville, is directly over the proposed transmission line. Also, in the past, emergency fire fighting planes and helicopters take off from the Stead airport facility and fly directly over Horizon Hills and over the proposed transmission line at very low elevations. OC. 17-11

h) Finally, the visual impact which this project will have on the residents of Horizon Hills cannot be mitigated. Our lifestyle, our homes, our peace of mind, our spiritual connectedness to the mountain will forever be destroyed by the intrusion of this 345KV powerline in our backyard.

The lines visual prominence as a foreground feature along US 395 from Bordertown to Horizon Hills would degrade the scenic quality of this major travel corridor, which has been officially designated as a scenic route.

We believe that the visual impact of this project, as well as other impacts, should be given equal weight with cost considerations. OC. 17-12

Suggested Alternatives to the current routing plan:

While we recognize Sierra Pacific's need to supply power to an ever increasing population in the Reno/Sparks area, we also are aware that a great majority of the power coming from this line is destined to supply the mining interests in northern and northeastern Nevada. Consequently, it would seem appropriate to route this line more directly to the major end users in Northern and Northeastern Nevada. Also, we seriously question the need to impact pristine wildland areas and rural ranching environments along the eastern Sierra Front from Susanville to Reno when there are existing lines with the carrying capacity which would route the power more directly to the main projected end users. Specifically, we would suggest that the 1000KV line which passes through the OC. 17-13

Black Rock Desert, along the Granite Range, down to Wadsworth, be utilized to handle additional carrying capacity. We understand that a connecting line would be necessary between Alturas and Cedarville through the Vya area to meet the existing 1000KV line. Additionally, once to the Wadsworth area, the 345KV line could be downsized to run into Reno along existing lines, and the major power could be diverted further north to meet the demands of the mining industry. This alternative seems viable, would have little impact as it is a preexisting line, and would effect less people than the current plan as it would pass through a less populated area. We sincerely hope that this alternative will be considered, for our sake and for the sake of all the potentially impacted people, wildlife and landscapes along the proposed Alturas line. OC. 17-13

Respectfully Submitted,

Cari Lockett, Secretary
Horizon Hills General Improvement District

cc:
All residents and property owners
of Horizon Hills

John Mendoza
Nevada Public Service Commission

Governor Bob Miller

Scott Nebesky
Truckee Meadows Regional Planning Agency

Roger Olack - SPPCO
Steven Younkin - SPPCO
Mike Reid - SPPCO

Bill VanBrugann
U.S. Forest Service
Toiyabe National Forest

U.S. Fish and Wildlife
Reno Field Station

Senator Richard Bryan

Senator Harry Reid

Congresswoman Barbara Vucanovich

Senator Bill Raggio

Assemblywoman Joan Lambert

Washoe Co. Commissioners
-Jim Shaw, Chairman
-Steve Bradhurst, ViceChair
-Grant Sims
-Joanne Bond
-Mike Mouliot

Lori Burke - Citizen's Committee

Jan Loveran - Citizen's Committee

Washoe Co. Planning Commission
-Development Review

North Valleys Citizen Advisory Board

5

but should not be done (especially with helicopters) in conjunction with wild life studies (5/6/95)

Org./Citizen Groups Comment Set 18

5/25/94

Julie Halligan
Project Chairman
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102 - 3298

re: Alturas Intertie
CPUC # A93-11-018

Dear Ms. Halligan,

As reflected in the recent comments at your scoping meetings in Susanville and Alturas, we (the people) are concerned about the meaning of the Right of Entry that Sierra Pacific Power Company forced property owners to sign.

Enclosed is Sierra Pacific's Right of Entry form. As you can see, it allows Sierra Pacific, their agents or contractors, to do basically whatever they would like, in what ever sequence they would like, for a period of nearly two years. Enclosed, also, is Sierra Pacific's misleading title page. Many of the proposed routes property owners were mislead into believing that it was in the propery owners best interest to sign the Right of Entry form for the environmental impact studies (EIS) as the EIS may show concerns that would warrent the line being relocated.

It stands to reason that environmental impact studies should be done prior to construction, moving of heavy equipment or any other studies (other than survey work), otherwise significant environmental sites may be disturbed or destroyed. Sierra Pacific does not specify this in the Right of Entry form that property owners were forced to sign. OC. 18-1

Indeed, Sierra Pacific has admitted at the Susanville scoping meeting (please check your notes), that they will be doing construction related studies consisting of digging holes up to 12' X 15'.

We feel the EIS and EIR will not be valid if properties are allowed to be disturbed in this manner prior to independent disinterested third party environmental analysis.

We, therefore, would like to make a formal request that the independent disinterested third party environmental study group (Aspen Environmental Group) complete all studies prior to Sierra Pacific Power Company or related individuals, agents or contractors being allowed on the study areas. We also would like to make a formal request that Sierra Pacific Power Company be made to reimburse those property owners for their court costs and legal expenses related to these property owner's attempt to limit Right of Entry so as to insure proper environmental studies prior to construction related activities and destruction of potential environmental concerns.

In summary, we feel that the CPUC should guide the environmental impact studies and when construction related activities should occur - not Sierra Pacific. OC. 18-1

Sincerely,

representing,
Neighbors Opposing Power Encroachments
P.O. Box 321
Alturas, CA 96101

re

bd

RECEIVED MAY 26 1995

Janet and Jerry Zebrack
Treasurer, Citizens for the
Preservation of Long Valley
R. Rt. 18 Box 44
Reno, NV 89506

May, 23, 1995

Org./Citizen Groups Comment Set 19

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Ms Halligan and Mr. Humm:

I am writing you concerning the proposed Sierra Pacific Power project. Sierra Pacific Power proposes to build an enormous substation for connecting the high voltage Alturas transmission lines through Long Valley, within 385 feet of a cluster of homes. SPP did not inform any of these land owners. The California Public Utilities Commission (CPUC) Application Number is (93-11-018) and the BLM Case Number is (CACA-31406). If this application is approved, thousands of citizens living in Anderson Acres, Horizon Hills, Stead, Bordertown and Long Valley will suffer devaluation of their homes.

There currently are three groups who adamantly oppose the establishment of a new corridor of high power lines, and a substation at Bordertown. These groups are: The Friends of Peavine, Bordertown Land Owners, and The Citizens for the Preservation of Long Valley. Other groups opposing the Long Valley location are: The Boy Scouts, Washoe County School District Outdoor Education, and Comstock Arabian Association. In addition, Washoe County Commissioner Joanne Bond is representing the north valley of Reno, and she is committed to help deny SPP a permit for the proposed sight.

The Alturas Transmission Line Project is designed mainly to supply power to mines in rural Nevada. These three groups all support the proposal of placing the power lines alongside the existing Nevada Alternative corridor located north of Fernley because it is already scarred with transmission lines. Mayor Bruce Breslow may not be aware of the recent options available with the Nevada Alternative corridor.
We propose that the power be broken down into 120 kv lines when it approaches Sparks. These lines could be run around existing houses so no homes would be destroyed. This would save north Reno from the environmental dammage of high power transmission lines. Such high towers cannot be mitigated. The quality of life for the citizens of northern Nevada make this a necessary investment for our city. OC. 19-1

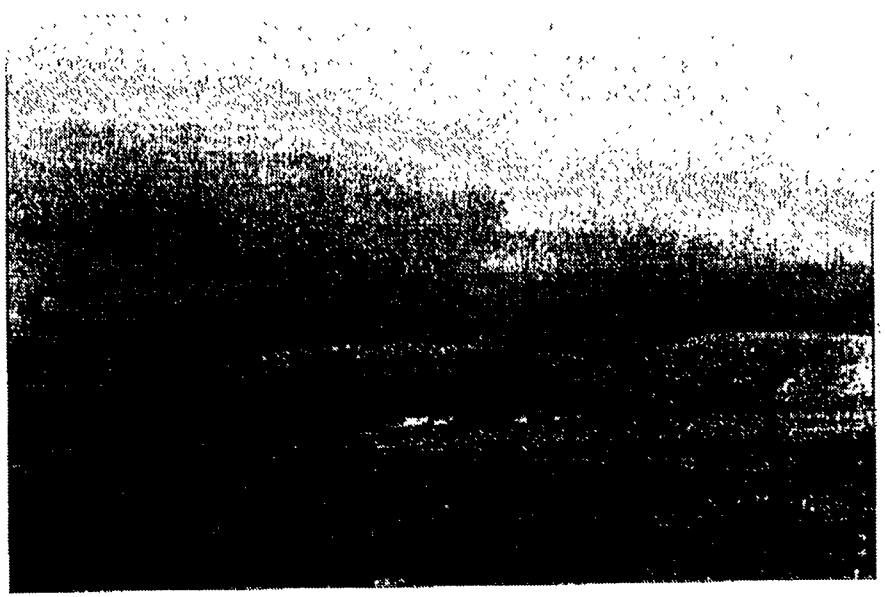
There are several reasons we are opposed to the north Reno location. First, the Toiyabe National Forest is a precious resource for the citizens of Reno to enjoy camping, hiking, horseback riding, mountain bicycling and hunting. The only north Reno access to the forest is through Long Valley. Second, this gorgeous valley is home to a wide variety of wildlife. Third, it has historical significance. Two of the original ranches date back to the 1860s. The original creamery still remains and the owner has applied to the National Advisory Counsel on Historic Preservation for the preservation of Long Valley. Long Valley, as an extension of the Toiyabe National Forest, deserves to be preserved for present and future generations. In addition, Washoe County has declared 395 North to be a "scenic corridor." OC. 19-2

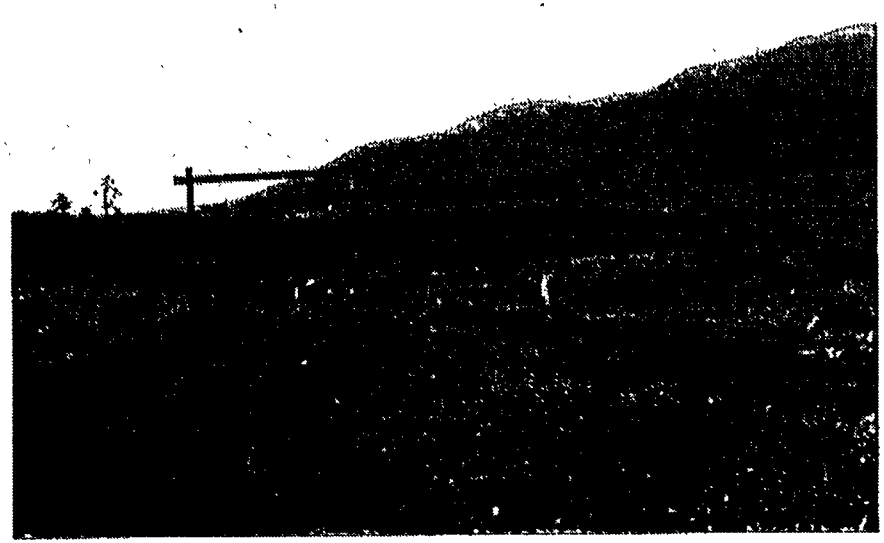
Please support Sierra County in its decision to oppose the Bordertown substation because it will effect the Washoe County border. Please support the use of existing corridors and the breakdown of power into 120kv lines so the citizens of northern Washoe County will not be adversely afffected. If this is not possible, please require SPP to expand their current substations or find a location other than Long Valley for their new substation. OC. 19-3

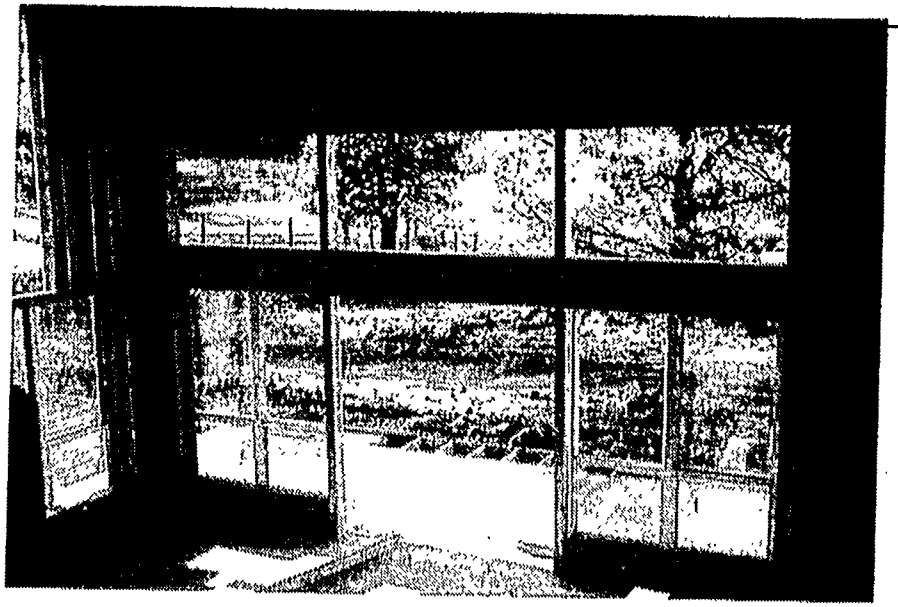
Thank you in advance for your consideration of this very important matter.

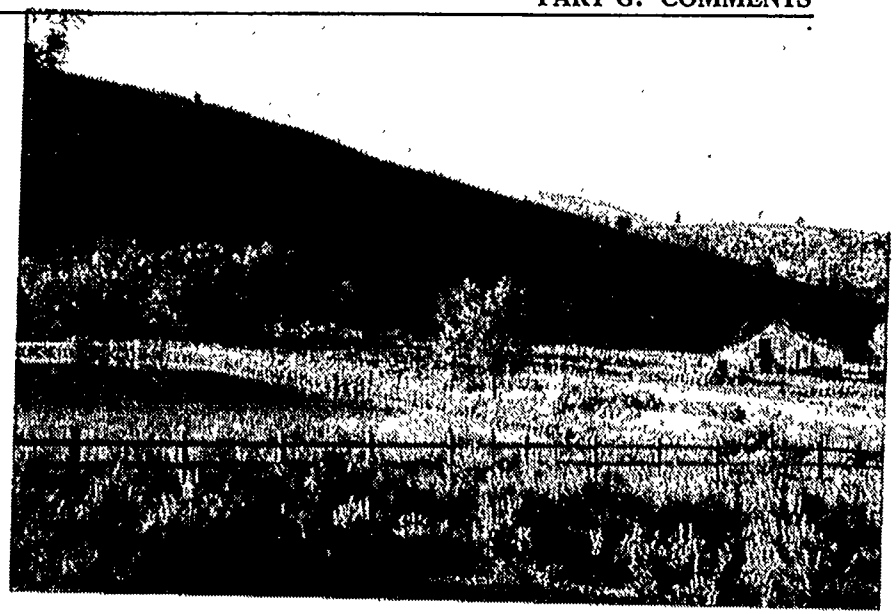
Sincerely yours,
Janet Zebrack
Janet Zebrack

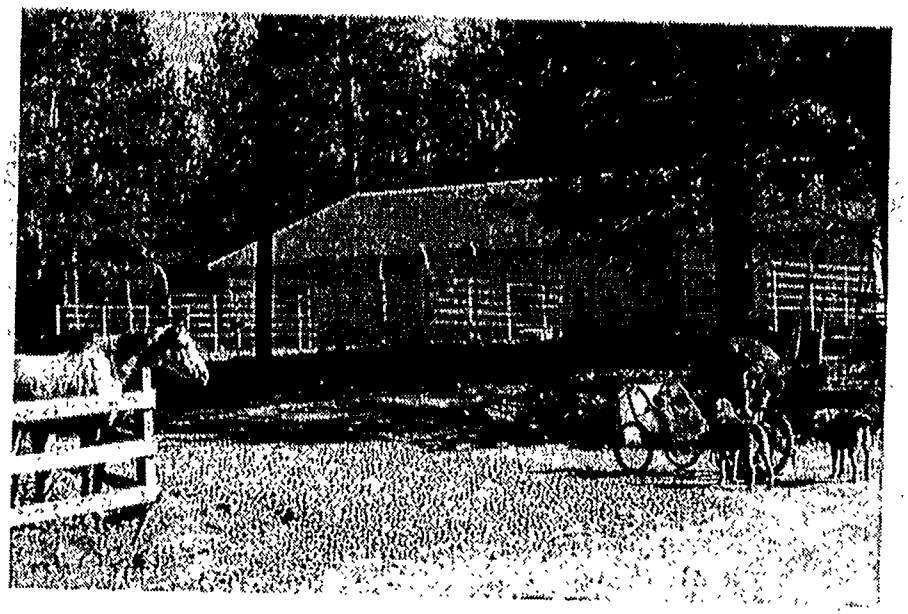
Photos of Long Valley

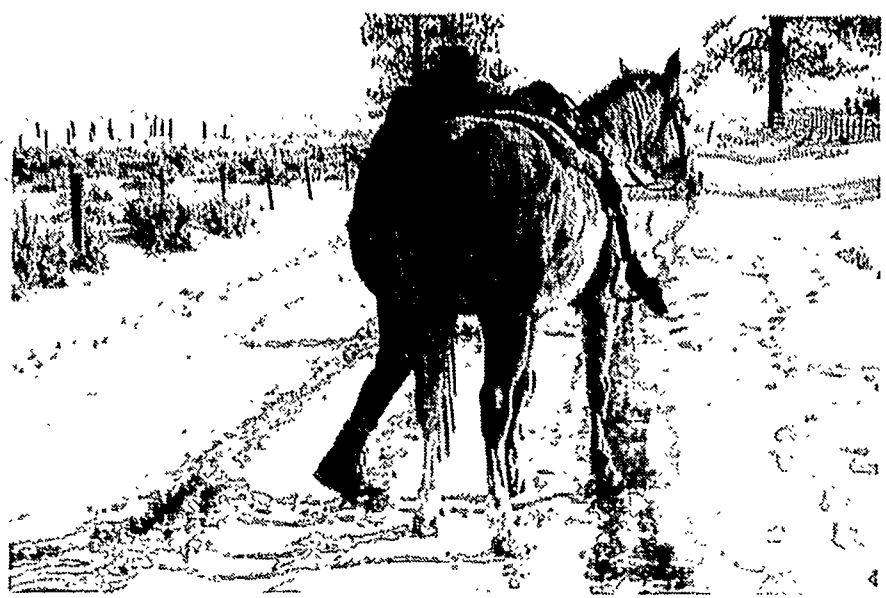












RECEIVED MAY 26 1995

EAGLE LAKE OFFICE
RECEIVED
MAY - 8 1995
BUREAU OF LAND MGMT

Stan Bales
Bureau of Land Management
Eagle Lake Resource Management
705 Hall Street
Susanville, California 96130

April 20, 1995

Org./Citizen Groups Comment Set 20

Re: Reno Alturas Intertie
CPUC # 93-11-018
BLM # CACA 31406

Dear Mr. Bales;

Sierra County Road 570 is a popularly used road for recreational purposes. According to Joyclyn Biro of the Toiyabe Forest Service, (telephone call, 4-17-95) the Long Valley Road is a major entrance to the Dog Valley Recreation Area. According to Ms. Biro the Dog Valley area is a "heavily used" day use recreational area because of its close proximity to Reno-Sparks.

We are aware the BLM is closely examining their parcel, APN # 021-090-02 for a possible land trade with Sierra Pacific Power Co. We are requesting close scrutiny of the visual and recreational impacts of such a dramatic change in use, when this area is an important recreational area. Enclosed are letters from various regional groups, including Washoe County School District, Boy scouts, horse groups and bicyclists indicating their use of this area.

This County Road is acknowledged in the CIG/R as frequently used by vehicles; it also serves as a means of non-vehicular recreation. We use this road for such daily activities as;

- jogging
- bicycling
- cross country skiing (seasonally)
- pleasure horseback riding
- horse training (long distance - Arabians)
- walking our dogs
- family hikes along Long Valley Creek for picnics, catching frogs, snakes and other critters
- wildflower studies
- ranch work

OC 20-1

We are requesting that you take into consideration the importance of managing public properties in their, visual, aesthetic, recreational and historic integrity.

Sincerely,
Long Valley
Nevada and California
Residents

R.R. 18 Box 1
Reno, Nv. 89506

cc: ~~Herrick Hanks~~ Pete Hemm
Bureau of Land Management

1. Edward Anderson
25 SIERRA VIEW RD

2. Mr + Mrs W. C. Wheatley
15 Sierra View Rd.
Reno, NV 89506

3. Mr + Mrs E. R. Sabo
20 Sierra View Rd.
Reno, NV 89506

4. Leo Nhatt
28 Sierra View
Reno NV 89506

5. Mr. & Mrs. Chris Page
24 Sierra View Rd.
Reno, NV, 89506

6. Charles Parrotto
Parrotto
36 Sierra View Rd
Reno Nv 89506

7. Mr. & Mrs. Earl Branham
1400 Bordertown Dr.
Reno, NV 89506

8. Ryan Wiesf
1460 Bordertown Dr.
Reno, Nv. 89506

9. Mr + Mrs Jeff Bond
10 Sierra View Rd
Reno, Nv 89506

10. Mark Warda
8 Sierra View Rd,
Reno, NV. 89506

Connie Van Hoke
5 Sierra View Rd
Reno, NV. 89506
(702) 677-7134

Steven Barkman
400 Green Gulch Rd
Sierra County, CA.

[illegible]
38 Sierra View
Reno NV 89506

Pat Hodges
38 Sierra View
Reno NV 89506

Janet Zebrack
R Rt 18 Box 44
Reno, NV 89506

Jerry Zebrack
113 W. Plumb Blvd
Reno. NV 89503

Cindy Hand
38 Sierra View Rd
Reno, Nevada 89506
702 - 972 - 2815

William R. [illegible]
400 Green Gulch Rd
Sierra Co, CA

Vicki Olsen
PO Box 20318
Reno, NV 89515

[illegible]
400 Green Gulch
Sierra Co, CA

Sammy Barrett
1257 E. Cheyenne St
Reno NV 89502

Richard Seker
490 Milton Dr
Reno 89511

Jan McEachin
1960 Gridley Ave
Reno NV 89503

Georgiba Bratton
31 Tulip Ct.
Reno NV 89512

Mary Ann Lucier
18565 Kay Lee Cir
Reno NV 89506

Mary Muir
P.O. Box 604
Fernley, NV. 89408

Celestine DeRosia
1840 Allen
Reno, NV. 89509

Vicki R. Rider
17 Selmi Drive
Reno NV 89512

Naomi Beaver
111 Rincon Avenue
Reno NV 89506

Cindy O'Shea
3815 El Rancho Dr.
Sun Valley NV 89433

Mary Cotton
3091 Schroeder Way
Sparks, Nv. 89431

Debbie Cotton
95 Sahara Ct
Sparks NV 89436

NANCY CARR
39936 REGAL DR.
RENO, NV 89503

[illegible]
[illegible]
Sparks NV 89434

Kenneth Commerford
6200 Meadowood Mall Cir #698
Reno, NV 89502

Sarah J. Tate
5270 Honeybear Dr.
Sun Valley NV 89433

Mary Farley
12495 Quilback
Reno NV 89511

Pearl Franklin
2244 Greenbrae #219
Sparks, NV 89431

Beth Reagan
2248 Valencia Ct
Sparks NV 89434

Jeanne Hankins
11545 Sitka St
Reno NV 89506

(over)

KAREN MEYERS
12715 S. VIRGINIA #24
RENO, NV 89511

MAUREEN GRESH
1215 BARING BLVD #133
SPARKS, NV 89431

Bobbi Ann Wilson
50 Brielle Path Terrace
SPARKS, NV. 89436

Bobbie Langdon
3124 Seventh St. Apt.
Sparks, Nv. 89434

Peggy R. Black
6070 Torrington Dr
Reno, NV 89511

Glenda Lawhun
1590 Breaker Way
Sparks, Nv. 89431

Jan + Jim Lovin
R.R. 18 BOX 1
Reno, NV. 89506

RECEIVED MAY 26 1995

NEVADA AREA COUNCIL • BOY SCOUTS OF AMERICA
RIDGEVIEW PLAZA • 5150 MAE ANNE AVE. • RENO, NEVADA 89523
702-787-1111
FAX 702-787-1114

Org./Citizen Groups
Comment Set 21

April 27, 1995

To Whom It May Concern,

The Nevada Area Council, Boy Scouts of America owns land in Dog Valley. This property is used for recreational purposes, when weather permits, by members of the Boy Scouts of America. OC-21-1

Sincerely,

Samuel Thomson
Senior District Executive

ST:cs

A PARTICIPATING UNITED WAY AGENCY

RECEIVED JUN [illegible]

United States Hang Gliding Assn., Inc.
P.O. Box 8300, Colorado Springs, Colorado 80933 (719) 632-8300 (719) 632-6417 FAX

Org./Citizen Groups
Comment Set 22

May 31, 1995

Julie Halligan/Peter Humm
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Re: CPUC Application no. 93-11-018
BLM case no. CACA-31406

We have investigated the proposed Alturus Translation line impact on the established flying sites in Nevada and California.

We request the line be installed to the North East side of the corridor only in one specific location to maintain an established landing area that has been utilized for the last 15 years. All of our other landing areas will not be impacted by the new transmission line.

The specific location is directly South East of Anderson where the lines cross the road going up to Peavine Mountain from the Red Rock/Lemmon Valley area. The landing area is the flat spot on the Verdi map approximately 119 degrees 54 minutes west and 39 degrees 35 minutes 45 seconds north. Moving the line down the hill away from this flat spot will be safer for pilots and minimize liability for Sierra Pacific Power Company.

We would like to evaluate the option of aviation balls on the lines after they are up. This would be the time to determine if they are necessary.

OC 22-1

If you have further questions or clarification regarding this issue, please contact the local evaluation team leader in Reno (Paul Hamilton at 849-9672).

We appreciate the continued cooperation with the BLM and Sierra Pacific Power Company we have had in the past to help keep the flying sites open. Thank you.

Sincerely,

Philip H. Bachman
Executive Director

RECEIVED JUN 0 5 1995

EAGLE LAKE OFFICE
RECEIVED
MAY 24 1995

May 8, 1995

Peter Humm
Bureau of Land Management
705 Hall Street
Susanville, California 96130

Re: Reno-Alturas Intertie
CPUC # 94042001
BLM # CACA 31406

Org./Citizen Groups Comment Set 23

Dear Mr. Humm;

I am ADAMANTLY OPPOSED to the Bureau of Land Managment considering trading property in Sierra County, California to Sierra Pacific Power Company. Sierra County has maintained standards of preservation and consideration of such action is directly contrary to those values.

As a Sierra County resident I am appalled at the BLM for even considering such a transaction. The location of the Bordertown substation will ATTRACT MORE HIGH VOLTAGE TRANSMISSION LINES, making Sierra County a dumping ground for high density living. (OC 23-1)

Long Valley is PRISTINE, visually sensitive and a historical Western ranching community and the the introduction of high voltage transmission lines focused at the substation site, APN # 021-090-02 is antithetical to established land uses. (OC 23-2)

I frequently use Toiyable National Forest and Dog Valley for recreation. Coming down out of the mountains on Sierra County Road 570 to see a major transmission hub will destroy the open space character of Long Valley.

In addition, did you know that Sierra Pacific and the Transmission Agency of Northern California would like to eventually run a line to the California substation in Verdi.....through Dog Valley? (OC 23-3)

I AM OPPOSED TO THE BLM TRADING APN # 0210090-02 TO ANY UTILITY FOR THE DEVELOPMENT OF A SUBSTATION AND/OR TRANSMISSION FACILITIES.

Sincerely,

Beverly J. Holland
101 Meadow Ranch Rd.
Calpine, CA 96124

cc: Toiyabe National Forest

The following people signed the form letter:

Sincerely,

Stephanie Atwood
Box 119
Calpine CA 96124

Anne Elliot
P.O. Box 184
Sierraville, Ca. 96126

Stephen Benner
Box 191
Sierraville CA. 96126

Katie Kelly
P.O. Box 166
Calpine, Ca. 96124

Kim McKinney
Box 217
125 S. Lincoln St.
Sierraville, CA 96126

Beverly Mitchell
P.O. Box 9
101 Mt. View
Calpine, CA 96124

John R Ingwald
BOX 86
CALPINE, CA. 96124

ROBERT SAVARINO
BOX 82
SIERRAVILLE CA 96126

Ruth Ann Savarino

Sincerely,
John Thomas
PO BOX 186
SIERRAVILLE CA
96126

Carolyn Rasmussen Perry
P.O. Box 143
Sierraville Ca 96126

Steven W Roberts
a concerned Sierra County citizen

RECEIVED JUN 05 1995

RECEIVED

MAY 25 1995

Org./Citizen Groups Comment Set 24

May 6, 1995

Peter Humm
Bureau of Land Management
705 Hall Street
Susanville, California 96130

Re: Reno-Alturas Intertie
CPUC # 94042001
BLM # CACA 31406

Dear Mr. Humm:

I am opposed to the possibility of the Bureau of Land Management trading APN # 021-090-02 to Sierra Pacific Power Company to build an electrical transmission substation.

Long Valley is PRISTINE, and historically significant and the intrusion of a 6-20 acre substation is TOTALLY INCONSISTENT WITH EXISTING LAND USE.

I am a recreational user of the Toiyabe Forest Dog Valley Recreation Area and Sierra County Road 570 is one of the major entrances. Passing by this substation and all its transmission lines will destroy the pastoral and recreational experience of Long Valley and Dog Valley.

OC 24-1

PLEASE DO NOT TRADE BLM PARCEL # 021-090-02 TO SIERRA PACIFIC POWER COMPANY OR ANY OTHER UTILITY.

Sincerely,
Ruby A. Swan
3497 Skyline Blvd.
Reno

Ruby A. Swan

cc: Toiyabe National Forest

The following people signed the form letter:

Sincerely,
Robert Albritt MD

Sincerely,

Sincerely,
Debra A. Beauchamp

Sincerely,

Sincerely,
Mr. & Mrs Earl Bankard

Sincerely,
Kenna Marie Butler

Sincerely,
Vickie Carron

Sincerely,
Renée S. Caraglia

Sincerely,

Sincerely,
Jerry J. Bari

Sincerely,
Jeniffer Belancio

Sincerely,
Lyreia R. Brown

Sincerely,

Sincerely,
Diane Casino & family

Sincerely,
Donna L. Poole

Sincerely,
Michael Carroll

The following people signed the form letter:

Sincerely,
Kimberly Crockell

Sincerely,
James M Cyg

Sincerely,
Mr & Mrs David Croson

Sincerely,
Charles L Davidson

Sincerely,
Denise Dolson

Sincerely,
Ivan L Kuld

Sincerely,
Kathryn E. Hall

Sincerely,
Emilia E. Fitzgerald

Sincerely,
Marilyn Chase

Sincerely,
Hans N. Cro

Sincerely,
John Cof

Sincerely,
Ann Lenau Dyfor

Sincerely,
Carlotta L. Dome

Sincerely,
Sheila Erlach

Sincerely,
Deanne Seiger

Sincerely,
Jule Fumer

The following people signed the form letter:

Sincerely,
Stanley & Marilyn Ferguson

Sincerely,
Marie J. Giudotti + family

Sincerely,
Mr. & Mrs. Baxter Graf

Sincerely,
Leon Hausberger

Sincerely,
Janice M. Jones

Sincerely,
Carmelyn T. Jones

Sincerely,
Dasha L. Kehmeier

Sincerely,
Don Grady

Sincerely,
Donna Ilsley

Sincerely,
Lois Kaufman

Sincerely,
Phyllis D. Gladding
Phyllis D. Gladding

Sincerely,
Dave G. Johnson

Sincerely,
Duke Kehmeier

The following people signed the form letter:

Sincerely,

Sincerely,

Sincerely,

Ira J. Loverin

Sincerely,

Jeanette E Lambeth

Sincerely,

Becky Mase

Sincerely,

Sincerely,

E Nole

Sincerely,

Sincerely,

TOMMY LOONKAW

Sincerely,

Mary Maynor

Sincerely,

Evelyn A. Loverin

Sincerely,

Betty Mann

Sincerely,

Sincerely,

Cheryl McGuffey

Sincerely,

The following people signed the form letter:

Sincerely,

STEPHEN T. NOYA

Sincerely,

Sincerely,

Sincerely,

Jim Penny

Sincerely,

Sincerely,

Elaine D Sawyer

Sincerely,

Jerry Sawyer

Sincerely,

Lorri A. Sears

Sincerely,

Debra A. Olson

Sincerely,

Brent Poplawski

Sincerely,

Cheryl & Mike Pavey

Sincerely,

Sincerely,

Sincerely,

Eugene B. Sawyer

Sincerely,

Katy Scull

Sincerely,

Mr. & Mrs. Mike Sheely

The following people signed the form letter:

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Sincerely,

From
Washoe County, NV.

RECEIVED JUN 0 5 1995

To Cal Public Utilities Com
RE: Proposed Alturas Power line

Org./Citizen Groups Comment Set 25

PETITION TO DENY ACCESS TO SIERRA PACIFIC POWER LINES ON PEAVINE MOUNTAIN

Two years ago the U. S. Forest Service committed itself to becoming involved in improving the appearance of Peavine and keeping it as a visual and recreational asset. Roads were modified and trash cleared up. The Alturas Intertie is a step backwards in preserving this magnificent regional asset. To surround the north and northeast faces of Peavine with power lines would aggravate its degradation, although some impact is inevitable considering the heavy use it gets from mountain bikes, automobiles, and hikers. Allowing a power line to run in this corridor invites use of this land for additional corridors and labels the area as a waste land fit for trashing.

Allowing the power line to run on this forest service land is also incompatible with the existing land use of the adjacent area, which is in a rural residential zone. Washoe County labels this piece of country an "Open Area" which it intends to acquire from the Forest Service for its residents. It is not only adjacent property owners who have an interest in the quality of Peavine Mountain.

There is also concern about the impact of the electromagnetic fields on people visiting the area, and about what construction will mean to the groves of pine trees on the eastern face of Peavine, since these are of botanical as well as recreational interest.

OC. 25-1

Joseph Burbank
Eileen Burbank 255 Hoge Rd Reno
Anne J. Thompson 1252 Weedacks Way, Reno, NV 89506 323-8483
" " "

Cynthia & Scott Fedinic 1075 Hoge Rd. Reno, Nev 89506

Grant Kleiner 755 Hoge Rd Reno, NV 89506

705 Hoge Rd. Reno, NV 89506
Nancy B O'Neill 705 Hoge Rd Reno, NV 89506
Dale Carter 475 Hoge Rd Reno, NV 89506
DIMITRIOS Murphis 198 HOGE RD
Betty & Tracy Cain 4965 Mason Rd Reno NV 89506
Betty Brangaccio 701 Hoge RD.
201 Hoge RD.

The following people signed the petition:

Scott Fedinic
1075 Hoge Rd 89506
Cynthia Fedinic - same as above
1080 Hoge Rd 89506
630 HOGE RD. — LYLE V. NIELSEN
— CAROL J. NIELSEN
— TODD SMITH
Mary H Hofmann
Paul Hofmann 855 Hoge Rd
Gary A. Simpres
1790 Bayne Hi Way
Sparks, NV 89431

Pat Brackett-Wright
5255 Eisan Ave
Reno, NV 89506
John Wright
5255 Eisan Ave
Reno NV 89506
Carol Pierson
5230 Mason Rd.
4945 Eisan
Reno, Nev 89506
1650 Ray Lane Dr
Reno 89503
Kenneth Cockman
1134 Ambassador Dr
Reno NV 89502

PETITION TO DENY ACCESS TO SIERRA PACIFIC POWER LINES ON PEAVINE MOUNTAIN

Dale McCombs Land owner Lots on Top of Hoge Rd
4790 Cayman Pkwy Hy 348-7652
Lisa McCombs 348-7652 " " "
Max McCombs 747-4153 " " "
Mary McCombs 747-4153 " " "
Henry Lefranto
331-7741
Morrison Drake 825-3598

recreational interest.

[illegible] 1120 Crow Point CT Reno, NV 89533

[illegible] 415 West Ninth Reno NV 89503

[illegible] 6250 Chickasaw Ct Sun Valley NV 89431

Stacey [illegible] 30 [illegible] Sparks, Nevada 89436

Brent Hart 1535 Kirman Ave Reno NV 89502

[illegible] 4329 Pescado Reno NV 89502

DAN GEHRKE 955 N MANDOY RENO NV 89512

KEN BROWN 1889 MORPHE [illegible] CARSON CITY NV 89705

[illegible] 5445 Sage Dr Sun Valley NV 89433

Brad Cockman 1136 Ambassador Reno, NV. 89523

Matt Duncan 2331 Harrington Reno NV 89503

George E. Crown 4200 Pinto Place Reno NV 89509

[illegible] 1475 [illegible] 89[illegible]

[illegible] 2855 [illegible] Reno, NV 89509

[illegible]

[illegible] Schmidt 1045 Hoge Rd Reno

[illegible] 205 Bartlett, Reno 89512

SHARON JOHNSON 1233 Bon Rea Way, Reno 89503

DAVID A. HORWOOD 1675 LAKESIDE DR. RENO, NV 89509

Charles Burton 3690 [illegible] Reno, NV 89509

[illegible] 1284 MARINE DR RENO NV 89503

Brennan O'Keefe 2750 Seven Dr. Reno NV 89503

Will Sappenfield PO Box 8359 Reno NV 89[illegible]

[illegible] 1650 Roulette Dr.

[illegible] 3525 Balboa Dr. 89523

[illegible] 1415 W 4th #55 89503

[illegible] 935 Wrecker Cove Apt. D 89502

[illegible] 3490 W. Plumb Dr.

[illegible] 500 Hoge Road, Reno

[illegible] 1335 Hoge Road, Reno

[illegible] 1335 Hoge Rd 89506

[illegible] 6510 Enchanted [illegible] 89523

[illegible] 6510 Enchanted [illegible] 89523

Org./Citizen Groups Comment Set 26

CITIZEN ALERT

M. LEE DAZEY
Northern Nevada Director

P.O. Box 5339 (3680 Grant Dr.) Reno, NV 89513
(702) 827-4200 Fax - 827-4299

June 1, 1995

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA. 91301

RE: Comments on DEIR/S of Alturas Transmission Line Project

Citizen Alert is a statewide environmental non-profit organization dedicated to the promotion of public participation on issues that affect our lives.

While it may be argued that new power projects are needed to provide electricity for future baseload needs in Washoe County, the health risks and loss of property values along the huge proposed 345 kV transmission route, as well as the loss of public lands rendered incompatible with a power corridor, necessitates that either Sierra Power Company use the existing corridor, bury the lines, or employ greater demand-side measures to offset the need. (OC. 26-1)

As these projects are paid for by the ratepayer, the ratepayer must be empowered to object to projects that have potentially serious environmental, health, cultural, aesthetic and land use impacts. And certainly no ratepayers should be required to suffer the consequences of projects created to meet the growing needs of the mining industry in Central Nevada.

A major health concern is the effects of electromagnetic fields (EMF) upon the health and well-being of residents, plants, and wildlife living near the proposed power corridor and substations.

In a report put out by the National Institute of Environmental Health Sciences and U.S. Department of Energy, eight of the 14 studies demonstrated a correlation between proximity to power lines and various types of cancer. Four of these studies showed a significant association wit leukemia.

This past winter Sierra Pacific put out a packet to its ratepayers called "Understanding EMF," which recommends how customers can limit their exposure to EMF. The question remains with this power project, how will residents living near the power lines and wildlife limit their exposure when the lines go through a corridor near their homes? (OC. 26-2)

The people of Washoe County know the effects of EMF and there is no way to rewrite history. Several years ago a story appeared in the Gazette Journal about a rancher near Rattlesnake Mountain whose cattle were aborting. The analysis was that EMF from a nearby substation was causing the cattle to abort. When Sierra Pacific wanted to run power lines from the Valley Station through a low-income neighborhood, various neighborhood leaders and activists mounted pressure on Sierra Pacific which eventually led them to bury the lines.

For a thirty mile stretch of the 164 mile corridor, the Tuscarora Pipeline shares the same corridor with the Alturas line. The land within this thirty mile corridor runs the risk of being contaminated by the fact that large transmission lines have been known to cause corrosion upon gas pipelines. They can corrode and result in leakages. Additionally, it states in the EIR/S that the potential exists for currents and voltages to be induced on the pipeline from the transmission lines. No more is said. The report needs to accurately describe the risks of inducement. (OC. 26-3)

Mitigation measures for minimizing particulate pollutants during the construction phase for the 37 miles corridor that the gas pipeline and the transmission line will share needs to be described. And impacts to Washoe County which is increasingly moving towards non-compliance in terms of dust and PM10 needs to be described. (OC. 26-4)

Aesthetically, the power project may impact our tourism-based economy. The 130 ft. towers would be unwelcome to ridgetops as part of Washoe County's Open Space Plan and may seriously impact Rancho San Rafael Park. The lines are projected to transverse acreage the park was to get from the Forest Service as part of the Evans Creek Project, an important project to protect the park from floods. Homes sharing the parks boundary and the transmission lines will be continually bathed in EMF. (OC. 26-5)

Until Sierra Pacific shows a greater commitment to renewables and demand-side in terms of meeting future baseload, we ask that the no-action alternative be taken.

One of the outcomes of the merger with Washington Power Co. and the subsequent project is that Sierra Pacific is paying less for locally generated geothermal energy. This marks a departure from Sierra Pacific's exemplary reliance (11%) of renewables. It is our understanding that ratepayers want low cost for electricity but not at the expense of our quality of life.

Thank you for this opportunity to comment.

M. Lee Dazey

M. Lee Dazey
Northern Nevada Director

Citizen Alert
P.O. Box 5339
Reno, NV. 89513
(702) 827-4200

RECEIVED JUN 0 5 1 :

IDAHO POWER
IDAHO POWER COMPANY
PO BOX 70
BOISE, IDAHO 83707

Org./Citizen Groups
Comment Set 27

June 2, 1995

Julie Halligan / Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA. 91301

SUBJECT: **Alturas Transmission Line Project**
Re: CPUC #93-11-018
BLM #CACA-31406

Dear Ms. Halligan / Mr. Humm:

We have reviewed the Draft Environmental Impact Report / Environmental Impact Statement (DEIR/EIS) for the Alturas Transmission Line Project. Idaho Power Company (IPCo) requests clarification of the decision process utilized which resulted in the elimination of the Midpoint-Valmy alternatives from further consideration. IPCo is submitting the following comments to provide an accurate representation of the Midpoint-Valmy alternatives.

We believe that a Midpoint-Valmy project in combination with Reno area reinforcements is environmentally acceptable and can also satisfy all of the primary objectives Sierra Pacific Power Company (SPPCo) specified for the Alturas project.

IPCo can provide a second 345 kV interconnection from Midpoint Substation to Falcon. A Valmy-Falcon 345 kV line projected to be in-service in 1996 is already planned by SPPCo. The facilities proposed by IPCo would consist of the northern portion of the Southwest Intertie Project (SWIP) transmission line from Midpoint to Rocky Peak (near Wells, Nevada) and a 120 mile long 345 kV line from Rocky Peak to Falcon which would be constructed within an existing BLM designated corridor. The Midpoint-Rocky Peak section would be 105 miles long and be designed for 500 kV operation (but would operate at 345 kV until the entire SWIP 500 kV facility is completed). The Record of Decision and Right-of-Way Grant for SWIP was issued by the BLM in 1994. OC. 27-1

The system design, reliability, utility corridor requirements and potential environmental impacts of the Midpoint-Rocky Peak-Falcon alternative have been evaluated. IPCo is confident that the necessary permits can be obtained and the line designed and constructed in a timely manner, which results in a viable cost competitive alternative to the Alturas Project. Should the Alturas Project be selected as the preferred alternative, we believe that the development of the northern portion of SWIP (Midpoint-Rocky Peak-Falcon) and Alturas are not mutually exclusive and in fact can provide complementary benefits. OC. 27-1

In the DEIR/EIS, SPPCo has identified three principal objectives for their project and five secondary objectives or benefits. It is unclear how use of these criteria resulted in the elimination of the Midpoint-Rocky Peak-Falcon alternative from consideration.

1) Increased SPPCo Import Capacity
Table C.14.1 notes that both the Alturas Project and the Midpoint-Valmy Alternatives increase the import capacity from 360 to 600 MW. A recent joint study[1] performed by SPPCo, Bonneville Power Administration, and IPCo showed that the Midpoint-Rocky Peak-Falcon line proposed by IPCo produces greater import and export capacity improvements than the Alturas Project. OC. 27-2

2) Improve Reliability to Reno/Lake Tahoe Area Customers
Table C.14.1 indicates that the Midpoint-Valmy alternatives meet this requirement if Tracy-Silver Lake or other Reno area reinforcement alternatives are included. Even with the addition of these reinforcements, this alternative appears to be cost competitive with the Alturas line.

3) Provide Additional Access to Pacific Northwest Power Market
Table C.14.1 indicates that the Midpoint-Valmy alternatives meet this requirement, but will provide only "indirect" access. However, this overlooks the fact that SPPCo and The Washington Water Power Company are merging. With one-half of the merged company located in the heart of

[1] Northern Nevada Joint Planning Study, Bonneville Power Administration, Idaho Power Company, and Sierra Pacific Power Company, February 1992, page 5

the Pacific Northwest, SPPCo will in fact have "direct" access via merger integration wheeling provided by IPCo.

Secondary Objectives and Benefits
Table C.14.1 indicates that the Midpoint-Valmy alternatives meet these requirements except for service to Lassen Municipal Utility District. OC. 27-2

In the evaluation of the Midpoint-Valmy alternatives, SPPCo cites potential environmental impacts, the need to construct a Tracy-Silver Lake line, utility corridor requirements, and permitting, design, and construction timing issues, all of which combine to render these alternatives as "...not considered preferable to the Proposed Project". It is our belief that if the costs and benefits of the various alternatives are fairly compared, the Midpoint-Rocky Peak-Falcon line could be a viable alternative. There may be reasons other than economics and environmental impacts that dictate the chosen alternative. Please clarify the decision process. OC. 27-3

Once again, thank you for this opportunity to comment on the draft document. If additional clarification of our comments is required, please contact Mr. Patrick J. Hasenoehrl at (208) 388-2746.

Sincerely,

Jan Packwood

Jan Packwood
VP Power Supply

RECEIVED JUN 05 1995

Org./Citizen Groups Comment Set 28

Julie Halligan
Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca. 91301

May 29, 1995

Re: Alturas Transmission Line Project EIR/S
CPUC Application No. 93-11-018
BLM Case No. CACA-31406

Dear Ms. Halligan and Mr. Humm;

Enclosed, please find comments on the Draft EIS/R for the Reno-Alturas Intertie from the Citizens for the Preservation of Long Valley. As the Draft currently stands, we are OPPOSED TO THE TRANSMISSION LINE ROUTING AND BORDERTOWN SUBSTATION.

The DEI/R is deficient for the following reasons:

1) The routing was determined by the purchase of the Bordertown substation site in early 1993 according to the PEA or, according to Stephen Younkin at the evidentiary hearings in June of 1990. The DEIR/S is defective because it failed to look at the sequence of events which led to Sierra Pacific's justification for using the Bordertown substation for this project. Specifically,

a) See the Western Utility Group Study, copyright by SPPCO in 1992. Review of the maps in the document illustrates two PROPOSED TRANSMISSION LINES passing through the Bordertown area. It also shows NO PROPOSED LINE COMING FROM ALTURAS TO RENO. See Attachment 1.

b) These two lines could be proposed by TANC (Transmission Agency of Northern California) or SMUD (Sacramento Municipal Utility District) or any other utility. See Attachment 2.

c) TANC is a municipally owned utility and it is staffed and managed by Resources Management Inc. (RMI) Both companies are located at the same office in Sacramento, California. Another words, TANC IS RMI. RMI is the consulting company SPPCO used in designing the routing for the Reno-Alturas Intertie. See PEA Vol 2, appendix B.

OC 28-1

d) Not included in the PEA is the corresponding RMI map. This map (available at SPPCO) illustrates the constraints used in determining the preferred routing. Physical examination of the map presented at the Sierra County Hearing April 19, 1995 shows that although there were many alternative segments developed, THERE WERE NO ALTERNATIVES PROVIDED FOR THE BORDERTOWN SUBSTATION AREA. The DEIR/S is defective because it has not addressed why the Bordertown substation site was THE CRITICAL CONSTRAINT IN THE ENTIRE PROJECT AND VIRTUALLY DETERMINED THE ROUTING.

OC 28-1

e) The DEIR/S is deficient because it did not review IN DEPTH, THE GROWTH INDUCING IMPACTS FROM THIS PROJECT. Janet Loverin's testimony in the evidentiary hearings, stated that the Bordertown substation will be from 7-20 acres in size. SPPCO did not challenge that fact. The DEIR/S failed to address the growth inducing impacts, when the Bordertown substation will be as large as 20 acres. This fact was told to Ms. Loverin by Roger Olack and was mentioned in our scoping letter of May, 1994.

OC 28-2

f) What makes the Bordertown area so attractive? The PEA states on pg 51 that "the Bordertown substation site wa s purchased in early 1993 that would be utilized for any importation and exportation of electric power to markets in the North and West". Did the DEIR/S check and see what was to the West of Bordertown? No. To the West of Bordertown is the Toiyabe National Forest, the Dog Valley Recreation Area and the "California" substation at Verdi. The Cal substation is the point at which a 69 kv line runs over the Sierra Nevada Mtns. According to anonymous utility executives, SPPCO wants to tie-in to Verdi - and thus create a "Transierra Line".

OC 28-3

g) A Transierra Line has been proposed and REJECTED in Nevada in 1984/5. According to the Fred Schmidt, Nevada Consumer Advocate and former Nevada Public Service Commissioner, it was rejected because of public outcry and basic ENVIRONMENTAL SENSITIVITY. See Attachment 3.

OC 28-4

2) The DEIR/S is in error because it allowed SPPCO to assign property which is encumbered by existing CONDITIONS, CONVENANTS AND RESTRICTIONS as the "ALTERNATIVE BORDERTOWN SUBSTATION SITE". This parcel is noted as parcel # 7 in the Pine Valley Subdivision. Page 5 of the CC and R's indicate that this property is to be used solely for single family residences. See Attachment 4.

3) The DEIR/S allowed Sierra Pacific to place Angle Point X01 on this parcel, when there appears no reason to do so; the line goes EAST not SOUTHWEST - unless they are designing the exit from Bordertown to accomodate another a line!

OC 28-5

4) The DEIR/S did not acknowledge the CONFLICTING SIERRA COUNTY ZONING ORDINANCES PROHIBITING TRANSMISSION FACILITIES IN AGRICULTURAL COMMUNITIES. OC. 28-6

5) The DEIR/S did not acknowledge the historic integrity of the upper end of Long Valley (although I had mentioned it in my scoping letter, May of 1994) Enclosed is a letter from Architectural Historian, Michele McFadden who has identified significant historic patterns in the upper end of Long Valley. I've also included supplemental maps. See Attachment 5. OC. 28-7

DEIS/S Part 1 INTRODUCTION/OVERVIEW

6) P. A-17 states that "Residential loads accounted for approximately 26 percent of SPPCO 's sales in 1992....Mining was the second largest sector for energy sales ....accounting for about 25 percent of SPPCO's total sales. Mining is the fastest growing section of SPPCO customers....but by 1997 it is expected to grow to about 34 percent of sales." The DEIR/S has not adequately explained why the mining load growth rise has not mandated a line directly to the mines, instead of routing to a urban area? Perhaps, it is because by placing some of the responsibility on the urban rate payer, SPPCO's wholesale rates will drop thereby making SPPCO's industrial rates more competitive. OC. 28-8

The DEIR/S has not connected the fact, that the increase in mining sales due in 1997 may be precipitating the "need" for this line to be on line by the end of 1996. A more direct route would be more appropriate.

7) P. A-22, under Primary Objectives, Increased SPPCO Import Capacity, states, "This tie would allow SPPCO to increase its import capability rating from 360 to 600 MW." This fact (from Steven Oldhams testimony at the evidentiary hearings) FAILS TO ACKNOWLEDGE THAT THE PINYON PINE PROJECT WILL YIELD A PREVIOUSLY UNACCOUNTED FOR 110 MW AND THAT THE COMBUSTION TURBINES ALSO UNACCOUNTED FOR, WILL YIELD AN ADDITIONAL 100 MW. SPPCO's need for additional import capability is therefore significantly lowered. OC. 28-9

SPPCO will argue back that the Pinyon Project and the CT turbines are not necessarily permanent. Hogwash. The DOE partially funded the project and if the impermanence is a problem, then why are they building the Tuscarora Pipeline????

8) P. A-22, under Primary Objectives, Improve Reliability fo Reno/Lake Tahoe Customers. Of the additional 300 MWs, 110 will be used to serve BPA's Northern Nevada transfer loads (Wells and Harney), Washington Water Power will use 90 MW. OC. 28-10

See Attachment 6. In addition Truckee Donner PUD has requested 30 MW (at the April 20, 1995 Reno hearing) and Lassen MUD has requested 50 MW (August 2, 1994 newspaper). How much does this leave to increase the reliability of the Reno/Tahoe area? NOT MUCH

To relieve reliability, SPPCO has previously stated that it must tie-in to North Valley Rd. This can be accomplished from a variety of means, unless of course, they are planning to run another line, which is not accounted for in the growth inducing impacts of this EIR/S. OC. 28-10

The sentence which states, that "this condition could lead to an outage on the transmission system resulting in a disruption of power to the area" is unjustified. For further reading on how utilities MISUSE TTHREATENING BLACK AND BROWN OUTS, PLEASE READ, Power Struggle by Richard Rudolph and Scott Ridley (New York: Harper and Row, 1986) - this excellent book explains the dynamics associated with utilities and explains their misuse of the facts to get what they want.

9) P.A-24, under Proposed Project Design. SPPCO proposes to install the phase shifter at the Bordertown substation site because it is cheaper than at North Valley Rd. As presented in the evidentiary hearings, SPPCO prepared the cost analysis for this comparision in January of 1994 - - years after they had designed the routing, which IN EVERY CASE, INCLUDED THE BORDERTOWN SUBSTATION - (IN THE ORIGINAL MAP, PRESENTED TO THE NEVADA PUBLIC SERVICE COMMISSION IN 1992, THEY ROUTED ALONG THE EAST SIDE OF THE PETERSEN MTN RANGE, THE DOGSKIN MTN RANGE AND STILL CAME INTO THE BORDERTOWN SUB BEFORE CONTINUING).

Their high cost comparison for using North Valley Rd. included a cut and fill scenario which only took into consideration their highest price options. See Attachment 7 for a complete layout of their property holdings at Valley Rd. and North Valley Rd. OC. 28-11

a) A lower cost option could be to go South from North Valley Rd. on what appears to be 4-5 acres.

b) Another option which was not considered would be to place the phase shifter and other equipment back further on the 54 acres SPPCO owns at North Valley Rd. There would be need for cut and fill. Physical examination of the site indicates that the topography on top of the hill is FLAT and undeveloped. PLEASE CONSIDER THIS OPTION IN THE FINAL EIR/S.

5

c) In addition, the cost of the Preferred Bordertown sub location does not include any costs associated with a trade with BLM for that property. OC. 28-11

10) P. A-24, states that, "Bordertown would also provide a convenient location (approximately 6 miles northwest of Reno) for a substation to help supply the potentially growing needs of the North Valley Area. First, Bordertown is NOT 6 MILES NORTHWEST OF RENO - MORE LIKE 12-15 MILES. Second, the EIR/S did not verify if the North Valleys area of Reno is growing. See Attachment 8.

Note the population forecast for the North Valley area in 1994 and then in 2015 - a slight increase. Now look at Spanish Springs, and area EAST of the preferred line: From 6,900 people in 1994 to almost a 300% growth increase in the year 2015. This is further supported by Sparks Mayor Bruce Breslow in his comments at the April 20, 1995 hearing in Reno. Please see Attachment 9. OC. 28-12

10) P. A-29, under Transmission Facilities for North Valley Growth. Again, please refer to # 9 - as there is very little growth in the North Valleys because there are severe water limitations -- the growth is further EAST. Sierra County prohibits any subdivisions in Long Valley, smaller than 80 acres. Also note that there is AN EXISTING 120 KV LINE WHICH RUNS FROM VALLEY RD SUB TO THE NORTH VALLEY AREA ------BUT IT IS CURRENTLY OPERATED AT ONLY 60 KV ----

Part B PROJECT DESCRIPTIONS AND ALTERNATIVES

11) P. B-20, under Bordertown Substation. The idea that the Bordertown substation "imposes fewer environmental impacts than expanding North Valley Rd. is ludicrous. The North Valley Rd. area is already a Public Service zoned area, with existing electrical and gas facilities. Hardly a scenic sensitive area.
According to Duane Nelson of SPPCO at the evidentiary hearings, the Valley Road substation has been there for MANY YEARS - the residential growth has developed around Valley Rd and was NOT NAIVELY IMPOSED ON THEM. Adding an additional 127' necessary to complete the Alturas Project does not seem to be a visual problem -- it's only when synthesizing the project by incorporating Bordertown sub onto Valley Rd becomes a visual problem. OC. 28-13

To continue, the same paragraph refers to the fact that the Bordertown sub will "provide SPPCO the flexibility for future interconnects given the additional area available." Given the fact that SPPCO has already planned a second phase shifter (which is not included in the one-line diagram in the PEA) certainly strengthens the fact that THE BORDERTOWN SWITCHING STATION WAS SELECTED FOR FUTURE INTERCONNECTIONS AND THAT THE ENTIRE RENO-ALTURAS INTERTIE ROUTING WAS BASED ON THAT FACT.

6

This is further supported by the "use of transmission line switching equipment would be installed." FOR WHAT.....IF NOT FOR FUTURE LINES? OC. 28-13

12) P. B-57, under East side of the Petersen Mtn. Range routes. The DEIR/S's rational for elimination for both route 1 and Route 2 are weak and conclusionary. Routing the line around the East side of the Petersen range would

a) be consistent with Sierra County 's zoning regulations and support their resolution, opposing the substation and transmission line in its current location in the County itself.

b) acknowledge the recreational experience of Toiyabe National Forest and Dog Valley users and allow that experience to remain in tact.

c) to locate a substation in an objective manner; NOT BUYING THE SUBSTATION SITE FIRST AND ROUTING TO IT, BUT ALLOWING THE ROUTING TO BE FIRST, THEN FINDING A SUITABLE SPOT FOR A SUBSTATION.

d) to preserve Long Valley as an historically significant open space area. OC. 28-14

e) to place a substation nearer the load growth, instead of trying to "create" need for growth in the Western area of the North Valleys, when there isn't any.

f) Force SPPCO to openly acknowledge its long term plans for future interconnections, under a distinctly separate application.

g) to mandate that the BLM classify the preferred location of the Bordertown substation site in its Visual Resource Management system (which had not been done until we requested it).

h) to challenge the Nevada Dept of Wildlife's concerns, until the UEPA process has been started in Nevada.

i) p. B-57, "Much of the area on the east side of Petersen Mountain range is relatively undisturbed and undeveloped." So is LONG VALLEY and yet we were not given the same consideration. (to clarify, the ridge which separates Long Valley from Cold Springs Valley has 2 areas of development, both in Washoe County and not in Long Valley per se)

13) P. B-58 , "The BLM indicates that the northern portion of Route 1 would be inconsistent with BLM land use plans and therefore would be unacceptable." That is a conclusionary statement and we are requesting a FULL EXPLANATION. Why aren't overhead transmission lines accepable in Dry Valley or Bedell Flat areas -- overhead transmission lines ALTER THE UNDEVELOPED CHARACTER OF ANY RURAL LANDSCAPE.

To route a line around "land use conrflicts in the Red Rock area and in the Cold Springs Valley where small parcels slated for future residential development would be crossed" are inconsistent and conclusionary.

a) why does potential development have superiority over existing residential developments?

b) Why does potential development in Nevada have superiority over Sierra County, California zoning?

c) Why does potential development have superiority over maintaining historic integrity and abiding by CEQA?

d) Can't developers design subdivisions around transmission and distribution lines? Don't they usually and haven't they in the past?

d) Routing of a substation should be to the load center to maximize usage and distribution potential.

OC. 28-15

14) P.B-58, under Eastside Route 2. "Potential conflicts with BLM lands, ranches, agricultural lands in the Lemmon Valley/Hungry Valley areas are land use disadvantages."
This statement is conclusionary.

a) Aren't there land use conflicts in the upper end of Long Valley?

b) Aren't there ranches in Long Valley?

c) Aren't there agricultural lands in Long Valley?

d) Aren't there BLM lands in Long Valley?

e) Aren't there California Fish and Game lands in Long Valley?

f) Isn't there a potential for a National Register nomination in Long Valley?

OC. 28-16

g) Aren't there cultural resources in Long Valley?

h) Aren't there zoning conflicts in Long Valley?

i) Aren't there residential developments/subdivisions in Long Valley?

OC. 28-16

15) P.B-61, under Alternative Bordertown Substation sites. The rationale for elimination of the listed sites on California Fish and Game property are conclusionary.

a) How would a substation conflict with wildlife?

b) Can't wildlife walk around a substation?

c) Do wildlife get cancer near substations?

d) Do wildlife damage the steel structures?

e) How will a substation conflict with land use goals anymore than a substation conflicting with Sierra County's land use goals?

OC. 28-17

16) P. B-61, continued. What does future inclusion of land purchases by Calif Fish and Game have to do with a substation site? So What?

OC. 28-18

17) p.B-61, under description. BLM parcel APN # 082-083-09 IS NOT LOCATED IN THE HALLELUJAH JUNCTION WILDLIFE AREA.....IT IS IN NEVADA. According to BLM officials, BLM parcels which may be designated for disposal, are usually surrounded by private property. This parcel is such a piece and furthermore, it is located behind a slight rise, shielding it from high visibility, on a existing dirt access road, would be closer to potential load growth that MAY occur in the Stead area, would keep the degradation in Nevada (who is benefitting from this project) and would not be located near historic properties.

OC. 28-19

18) P. B-62, under expansion of North Valley Rd substation. Please see # 11. The DEIR/S performed a very shallow examination of the cost comparisions between the two sites. The DEIR/S did not consider duplication of circuit breakers, reactors, fencing in comparing the two sites. The evidentiary hearings revealed that most of that equipment can be placed at North Valley Rd. and that would reduce costs.

a) The DEIR/S did not look at using the land to the south of the North Valley Rd sub.

OC. 28-20

b) The DEIR/S did not look at how much of the cut land could be used for fill. Physical examination of the site revealed there is only 27" of imported DG on the existing pad, the remaining dirt is from the cut land.

c) The DEIR/S did not do its own INDEPENDENT analysis of the costs involved, instead figures from SPPCO were used. In the cost comparisions, it states that SPPCO only used their approved contractors. WE WANT ANOTHER INDEPENDENT EVALUATION, USING FREE ENTERPRISE. OC. 28-20

d) "Finally, cut and fill on the hillside would be visible from Reno/Sparks, etc...." SO WHAT.

1) There are existing transmission facilities.
2) There is existing cut and fill.
3) There is appropriate public service zoning.
4) There is an existing corridor.
5) It is already degraded.

Part C ENVIRONMENTAL ANALYSIS

19) P. C.4-1, under study area. The DEIR/S (by virtue of the BLM) identified only a 660' Area of Potential Effect. This is inadequate. We have requested (from the BLM and that National Advisory Council for Historic Preservation) a 1 mile APE on either side of the line for cultural, historic and visual resources. According to Kathy Cameron of the Advisory Council this has been granted. OC. 28-21

20) P. C.4-30, under Environmental Impacts and Mitigation Measures. The DEIR/S identifies the 4 categories of potential impacts on cultural resources. # 4, discusses effects related the the effects on the integrity, feeling or association with a cultural resource site. Since the DEIR/S did not acknowledge any historic properties, it is not surprising this was not addressed. But in the FINAL EIR/S WE ADAMANTLY REQUESTING THAT A ARCHITECTURAL HISTORIAN BE SENT TO THE UPPER END OF LONG VALLEY AND DO A PHYSICAL SURVEY OF THE EXPANDED A.P.E. FINDINGS SHOULD INCLUDE A DISCUSSION ON THE INTEGRITY OF FEELING, ASSOCIATION OF THE HISTORIC NATURE OF THIS VALLEY. OC. 28-22

For further information please refer to: Preservation Briefs# 36 Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes by Charles A. Birnbaum (U.S. Dept of the Interior, National Park Service, Cultural Resources) and National Register Bulletin # 30: Technical information of comphrehensive planning, survey of cultural resources and

registration in the National Register of Historic Places (U.S. Dept of the Interior, National Park Service). Both of these publications are available at the California Govt Printing Office for $ 3.00 each. OC. 28-22

21) Pg. C.4-47, under Bordertown substation alternative. The DEIR/S is DEFICIENT BECAUSE IT FAILED TO RECOGNIZE THE OLD 1862 RANCH AS AN HISTORIC PROPERTY. The comment, "there is no basis for the selection of one site versus the other from a cultural resource standpoint" IS ABSOLUTE NONSENSE. We have a LARGE sign out front, with the words, Old 1862 Ranch on it. We have 3 obvious historic buildings on the site. See # 5. OC. 28-23

22) Pg. C.8-7 identifies the zoning for the Bordertown substation and transmission lines. It does not say whether this is consistent with Sierra County Regulations. It does not mention that Sierra County Rd. 570 is a heavily used road providing access to the Toiyabe National Forest and the Dog Valley Recreational ARea. It does not identify that this road is commonly used for jogging, walking, bicycling, ranch work, and used by the Boy Scouts of America, Washoe County school children and several equestrian groups. Please refer to Stan Bales, of the BLM Susanville Office for complete details. OC. 28-24

23) Pg. C.8-24, under Construction Impacts on Recreational Uses, does not mention Sierra County Rd 570 as being a major entrance to Toiyable National Forest and the Dog Valley Recreation Area. It also does not mention that the upper end of Long Valley is an active raching community with horsetrailers, haywagons, and cowboys moving cattle. In fact this area is such a popular all season recreation area, that during the Winter of 92-93 there were so many snowmobilers and cross country skiers out here, we had to request that the Sierra County Sheriff ban these recreation users until we could bring in the hay trucks. The County does not plow Sierra County Road 570 during the winter. OC. 28-25

24) Pg. C. 8-29, under Degradation of Quality of Residential Uses. It does identify effects of any of the angulation points associated with Bordertown substation, e.g. VO5, BSO1,BSO2, BSO3, BSO4. OC. 28-26

25) Pg. C.8-32, under Mitigation Measure for Impacts on Recreation Users. The DEIR/S does not acknowledge the Long Valley area as a popular recreation area. Many dirt bikes and ATVs are used from the Bordertown area to Dog Valley and the Toiyabe National Forest. OC. 28-27

26) Pg. C.9-18 under Environmental Setting. The DEIR/S inaccurately describes the preferred Bordertown substation site and the alternate site as being "surrounded by commercial and industrial zoning." WRONG. The Washoe County, Nevada side of the adjoining parcels are surrounded by rural residential zoning, with 2 industrial endeavors. A 3rd commercial site is a temporary heavy equipment operator, who has a special use permit. The Sierra County side is strictly pristine agricultural. OC. 28-28

27) Pg. C.-13-6. We are all aware of the transposition error on Table C.13-3 regarding a Class I VRM Classification and a Class 1 Impact. We have requested a VRM rating be done for the BLM parcel, slated to be the location for the preferred Bordertown substation site. OC. 28-29

28) Pg. C.13-45 and 46, under Cumulative Impacts and Mitigation Measures. The DEIR/S fails to adress the cumulative impacts from the Bordertown substation. On page 51 of the PEA, it specifically states that this substation will be a switching station, used for the importation and exportation of power. What will be the cumulative effects of additional lines on a traditional ranching community and high use recreational area?
This is erroneously touched upon on page C.13-47, where it states that the significance of the cumulative impact is expected to be adverse but not significant due to the relatively limited number of viewers. Let me refer the reader back to page C.12-4 of this DEIR/S where it states that Sierra County Road 570 gets 100 vehicles per day. That number, plus the additional use from non-vehiclular activities such as jogging, walking, bicycling, horseback riding, etc (check with Stan Bales on this) brings that visual sensitivity up to over 45,000 visits a year - indicating HIGH VISUAL SENSITIVITY - not relatively few numbers of viewers. OC. 28-30

29) Pg. C.13-65, under Alternative Segment WCFG. It states that public lands crossed by Alternative segment WCFG have been designated BLM VRM Class III. In telephone conversations with Stan Bales, he admitted that no specific classification had been assigned to the preferred Bordertown substation site. It was only given a general broad classification, assuming it was similar to other parcels. Physical examination by him, indicated that the VRM rating to be a B Scenic Quality Rating. That rating, coupled with the visual sensitivity, could improve the non-specific Class 3 rating. OC. 28-31

30) Pg. C. 14-2. On Table C.14-1 Transmission alternatives, the Nevada Route Alternative and the Summer Lake Alternative would meet all 3 primary objectives, except for transmission service to the OC. 28-32

North Valley area. Please see # 10. The DEIR/S failed to thoroughly examine SPPCO's premise that the North Valleys area is growing. A thorough investigation is required. OC. 28-32

The DEIR/S failed to investigate the ramifications of the proposed LMUD tie-in. The DEIR/S is deficient because it did not review:

a) the contract with Western Area Power Association, secured approximately 1 1/2 years ago.

b) the purpose of the Wendell substation. This request for a substation 10 years into the future is ridulous and serves only to act as a constraint in routing the Reno-Alturas Intertie.

c) LMUD just signed a ten year contract with P,G and E. OC. 28-33

31) Pg. C.14-2 continued. The Frenchman tap alternative is not explored at all. This short line would indeed meet the import desires of SPPCO, especially when considering the additional mega watts yielded by Pinyon (110 MW) and the CT turbines (100 Mw) at Tracy. This alternative would be dramatically less expensive and would benefit SPPCO's transmission system. PLEASE RE-CONSIDER THIS ALTERNATIVE. OC. 28-34

32) Another alternative not addressed in the DEIR/S but suggested in the testimony by John P. Solaro was to run the line on the East side of the Petersen Mountain Range. This would correctly serve the growth in the Spanish Springs area. PLEASE CONSIDER THIS OPTION. OC. 28-35

ADDITIONAL LONG-TERM IMPLICATIONS

33) Pg. E-5. The DEIR/S has taken a very superficial look at the long range plans for the Bordertown substation. Please refer to # 1 a and b. The dates for the TANC work paper was from June of 1994 and the SMUD workpapers are from 1993. 5-10 YEARS IS IMMEDIATE, ESPECIALLY WHEN PLANS ARE BEING DISCUSSED BEFORE THE APPROVAL OF THE BORDERTOWN SUBSTATION. The DEIR/S's comment about the placement of a second phase shifter is ludicrous. Please consult your engineer ----a phase shifter is determined by the phase angle impedence for a SPECIFIC LINE. The angle is dependent upon the location of the beginning and terminus of the line. OC. 28-36

34) Pg. E-5 continued. Again, the idea that the Bordertown substation would serve growth in the North Valleys needs considerable more investigation from Washoe County, Nevada. In addition, use of the Bordertown substation for Nevada distribution would be in the Plumas Sierra Rural Electric Co-ops service territory. OC. 28-37

35) Pg. E-5, continued. "Given that no definite plans have been designed..." CONTRADICTS ROGER OLACKS STATEMENT THAT THE BORDERTOWN SUBSTATION COULD BE AS LARGE AS 20 ACRES. CERTAINLY SOME PLANNING HAS BEEN DONE. OC. 28-38

36) In general, the DEIR/S has failed to acknowledge any of the mitigation measures suggested by Citizens for the Preservation of Long Valley in our May 24, 1994 scoping letter. See Attachment 10. OC. 28-39

37) In addition to our stated mitigation requests, we are also requesting, (if Bordertown goes in) a contract with Sierra County for annual maintenance and replacement of trees (in case they die). OC. 28-40

Well, in closing, Julie, Peter, Gary and Vicki (who I assume will be the readers), this has been a most difficult year for all of us. Long Valley is deserving of preservation and there is no need for the Bordertown substation, but as with most challenges in life, is difficult to prove. We are requesting that you will take ALL OF OUR POINTS AND THOROUGHLY INVESTIGATE EACH ONE. (PLEASE DO NOT IGNORE IT, AS WAS DONE WITH OUR SCOPING LETTER). Thank you.

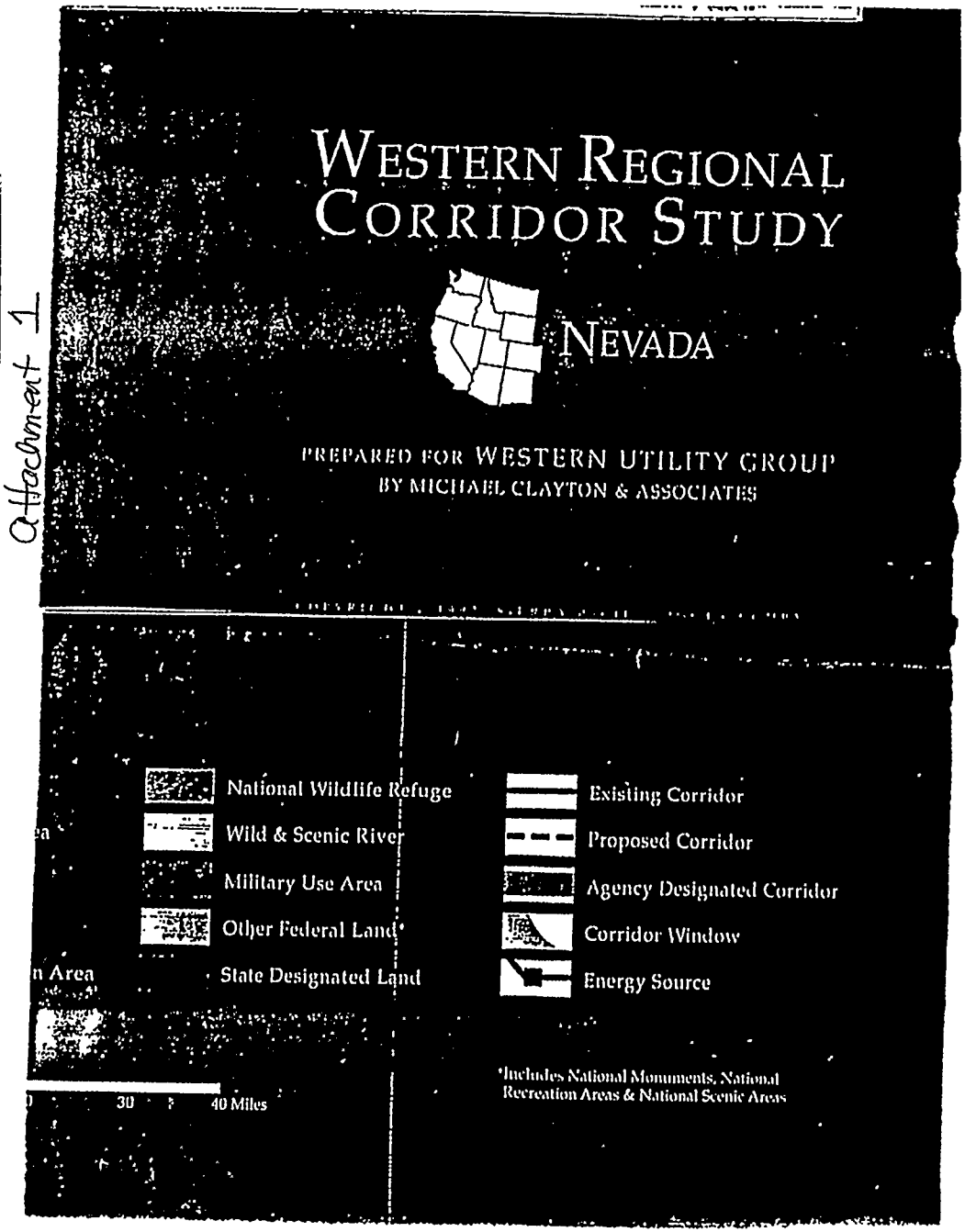
Sincerely,

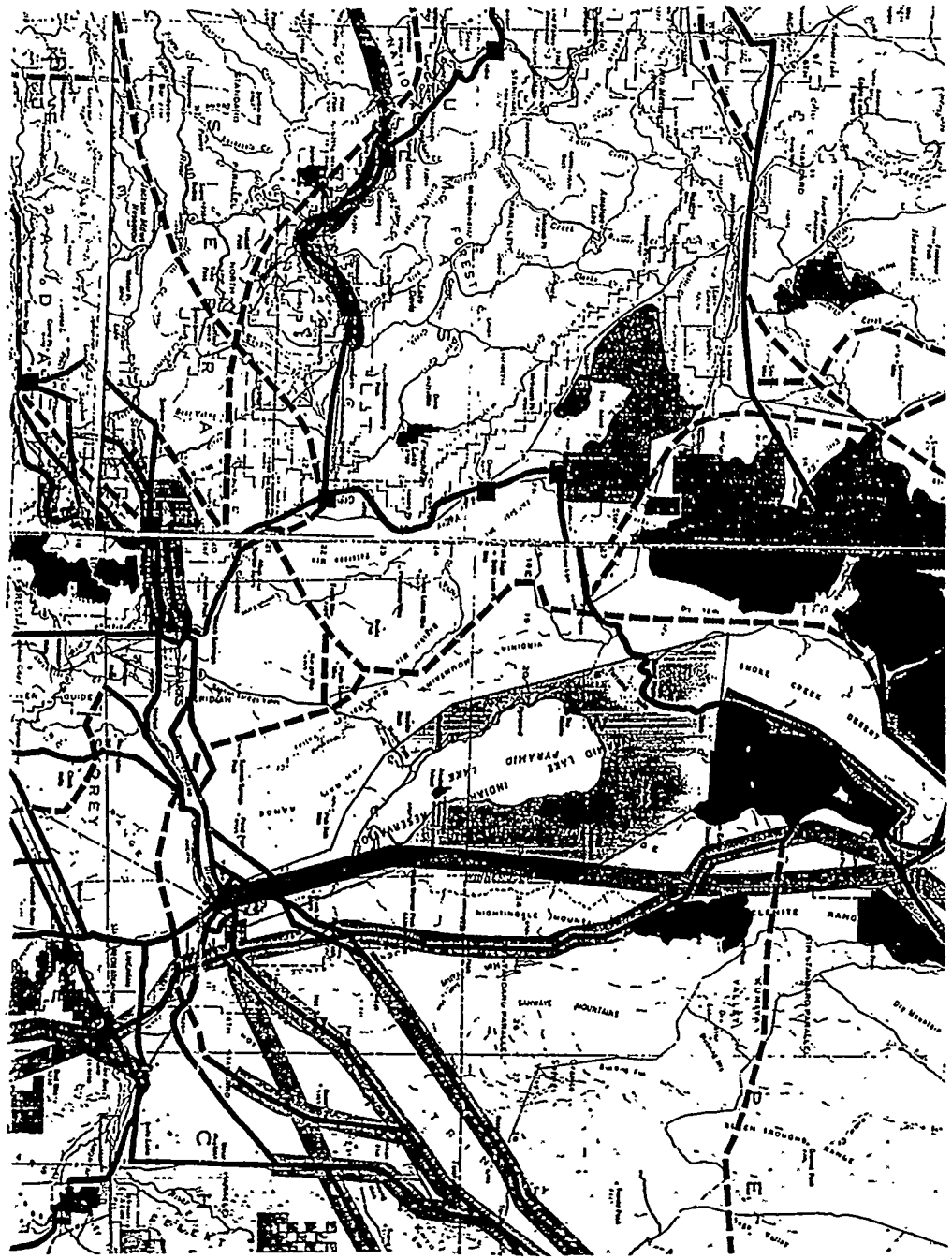
Jan and Jim Loverin
Citizens for the
Preservation of Long Valley

members:

Joyce Stoffey
Pat Hodges
Myrna Moore
Andy and Rhonda Sallaberry
Ned Allen
Jim and Jan Loverin
Jerry and Janet Zebrack
Bob and Stephanie Merchant
Buck and Bea Sumpter
Dick and Louise Powell

Attachment 1



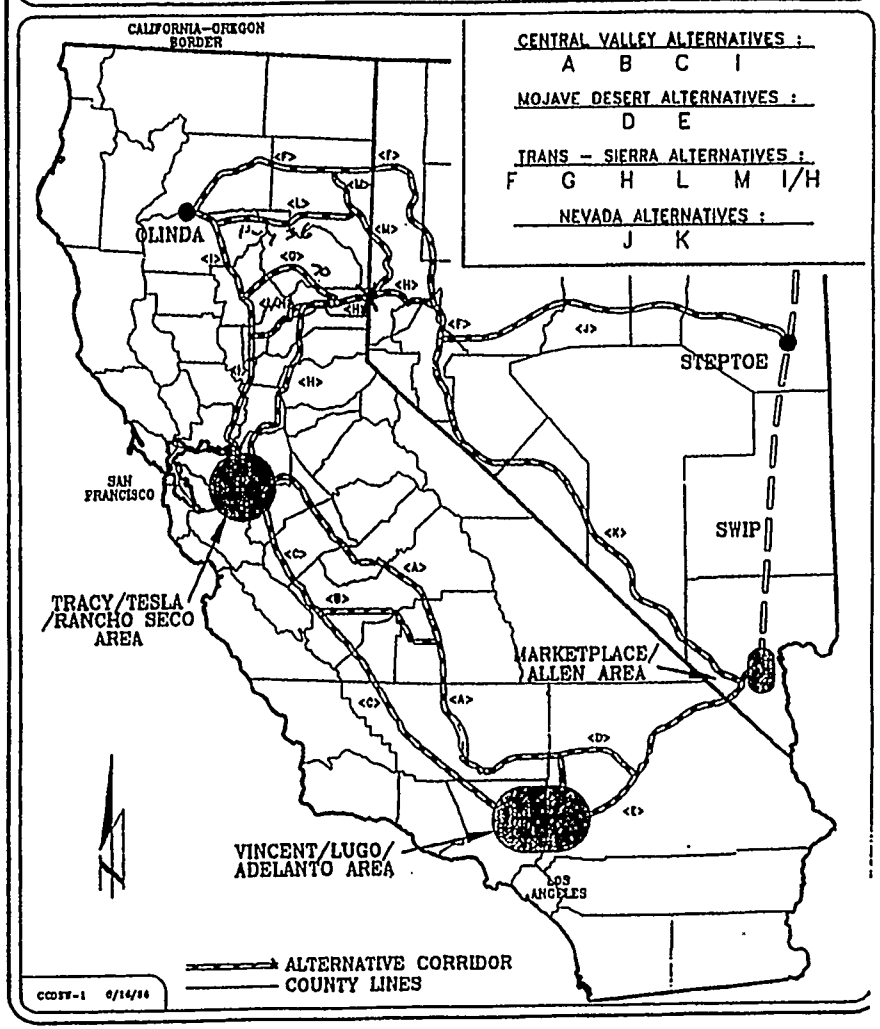


Attachment 2

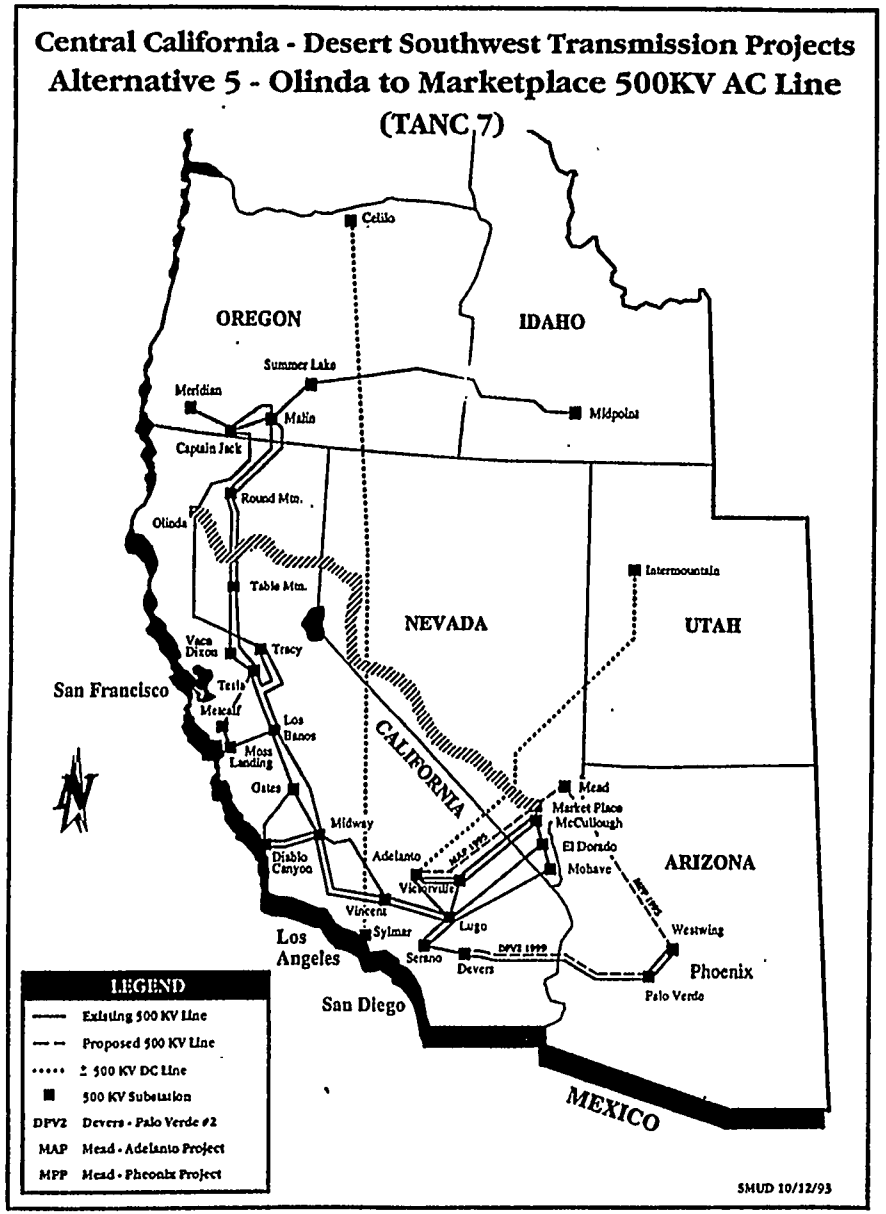
Attachment S1

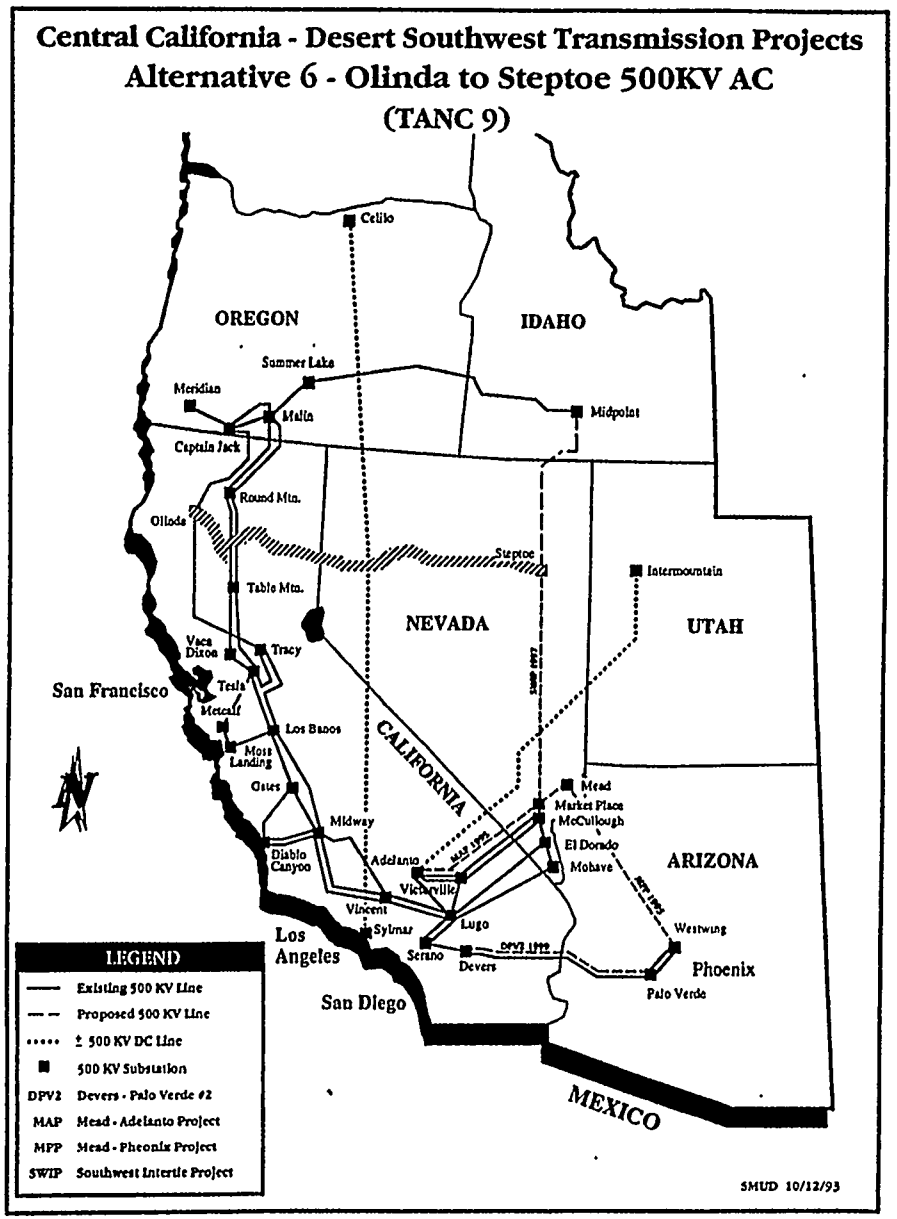
CENTRAL CALIFORNIA–DESERT SOUTHWEST TRANSMISSION PROJECT

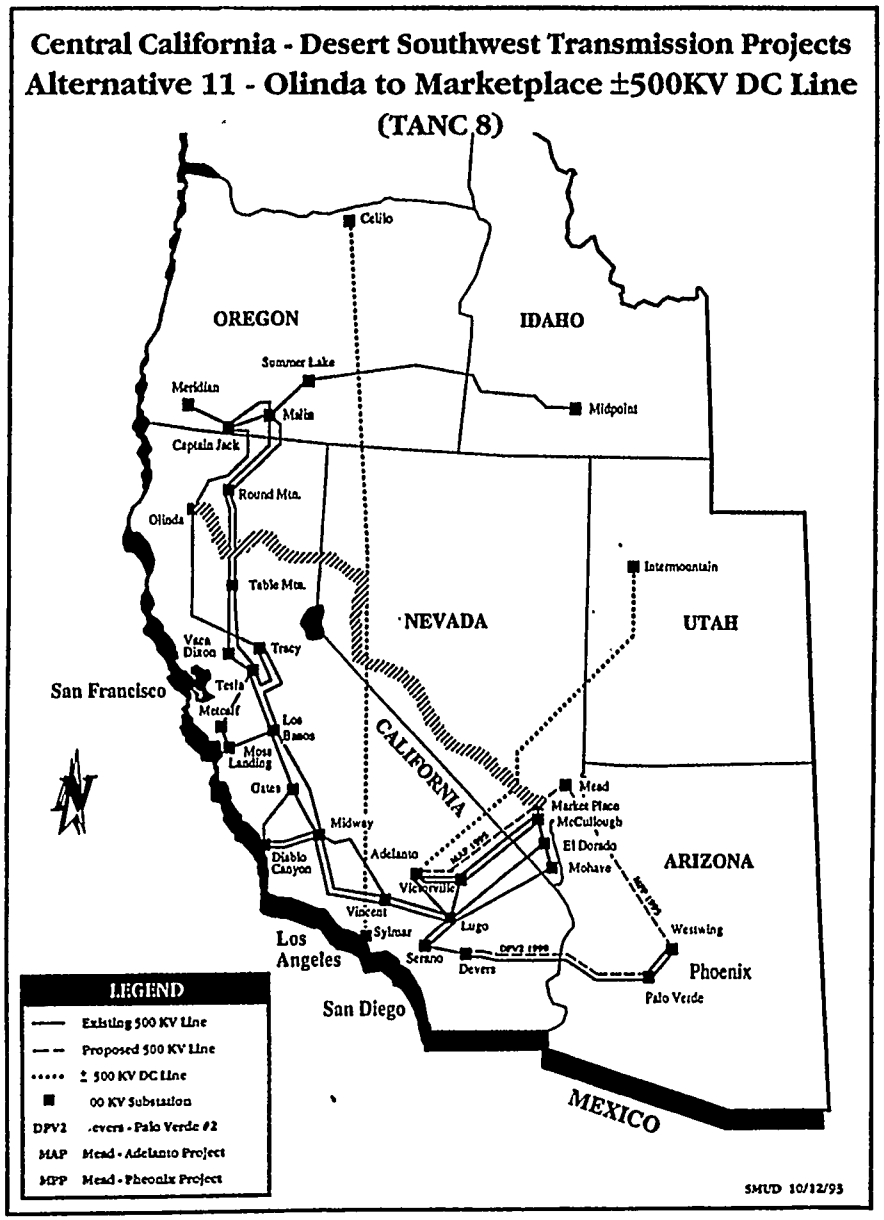
POTENTIAL ALTERNATIVE CORRIDORS



TANC


Central California - Desert Southwest Transmission Projects
Alternative 5 - Olinda to Marketplace 500KV AC Line
(TANC 7)
OREGON
IDAHO
NEVADA
UTAH
ARIZONA
CALIFORNIA
MEXICO
San Francisco
Los Angeles
San Diego
Phoenix
Celilo
Summer Lake
Meridian
Malin
Midpoint
Captain Jack
Round Mtn.
Olinda
Table Mtn.
Intermountain
Vaca Dixon
Tracy
Tesla
Metcalf
Los Banos
Moss Landing
Gates
Mead
Market Place
McCullough
El Dorado
Mohave
Midway
Diablo Canyon
Adelanto
Victorville
Vincent
Sylmar
Lugo
Serano
Devers
Westwing
Palo Verde
LEGEND
Existing 500 KV Line
Proposed 500 KV Line
± 500 KV DC Line
500 KV Substation
DPV2 Devers - Palo Verde #2
MAP Mead - Adelanto Project
MPP Mead - Phoenix Project
SMUD 10/12/93


Central California - Desert Southwest Transmission Projects
Alternative 6 - Olinda to Steptoe 500KV AC
(TANC 9)
OREGON
IDAHO
NEVADA
UTAH
ARIZONA
CALIFORNIA
MEXICO
San Francisco
Los Angeles
San Diego
Phoenix
Celilo
Summer Lake
Meridian
Malin
Midpoint
Captain Jack
Round Mtn.
Olinda
Steptoe
Table Mtn.
Intermountain
Vaca Dixon
Tracy
Tesla
Metcalf
Los Banos
Moss Landing
Gates
Mead
Market Place
McCullough
El Dorado
Mohave
Midway
Diablo Canyon
Adelanto
Victorville
Vincent
Sylmar
Lugo
Serano
Devers
Westwing
Palo Verde
LEGEND
Existing 500 KV Line
Proposed 500 KV Line
± 500 KV DC Line
500 KV Substation
DPV2 Devers - Palo Verde #2
MAP Mead - Adelanto Project
MPP Mead - Phoenix Project
SWIP Southwest Intertie Project
SMUD 10/12/93



Attachment 3

CERTIFIED COPY

BEFORE THE PUBLIC SERVICE COMMISSION OF NEVADA

In the Matter of SIERRA PACIFIC POWER COMPANY'S proposed 1986-2005 Electric Resource Plan. — Docket No. 86-701

HEARD: September 24-30, 1986
October 1-3, 1986
October 16-17, 1986

DECIDED: November 14, 1986

APPEARANCES:

For the Commission: Stephen Wiel, Commissioner
Presiding Officer
Fred Schmidt, Commissioner
Tom Stephens, Commissioner
Jo Ann Kelly, Commissioner
Leslie T. Miller,
Administrative Assistant
Michael Griffin, Sr.,
Deputy Commissioner
Michael Greedy, Financial Analyst
Ana Colon Aebi, Assistant Commission Counsel

For Sierra Pacific Power Company: Susan Oldham, Esq.

For Staff: Connie Westadt, Esq.
Assistant Staff Counsel

For the Office of Consumer Advocate: Jon Wellinghoff, Esq.

For the Office of Community Service: James P. Hawke

For Southwest Gas Corporation: Andrew Bettwy, Esq.

For Nevada Mining Association and Truckee Meadows Limited Partnership: Patrick Fagan, Esq.

For Hunson Geothermal and Truckee Meadows Limited Partnership: Carl R. Steen, Esq.
Richard G. Campbell, Esq.

DOCKET No. 86-701
DOCUMENT No. 398

should proceed with these plans as described. The Commission also approves the Customer Standby for Peaking program. The Commission agrees with the OCS that the program would provide benefits to SPP and its customers. However, it is also clear that SPP has not yet completed a cost-benefit study of this program (Exhibit 3 page 7). Therefore, the Commission approves the program subject to proof, using the approved methodology, that the benfits of this program exceed the costs.

The Commission does not feel SPP has fully justified dispensing with further resource plan approval of the SMUD Tie, entering into contracts regarding coal plant construction or obtaining 150 MW of purchase power. The Commission explains its decision below.

Transmission Interties

SPP is willing to commit substantial resources to complete its SMUD Tie licensing studies. In view of the advanced state of the studies, as well as the fact that the studies are unopposed by the parties and are expected to cost SPP only $403,000 to complete (Exhibit 27), the Commission will allow those studies to be completed. The fact that the Commission approves these licensing studies does not make the SMUD Tie an approved resource. SPP must obtain additional resource plan approval before taking steps beyond licensing. The reasons are evident and a few examples sufficiently explain this decision. Most obvious is the fact that SPP has not completed its evaluation of the need for the SMUD Tie. In addition, SPP did not model the SMUD Tie as a firm resource (Exhibit 5, Table 2-1 and 9-4 notes 4 and 5, and especially Table 2 on page 10-157). The Commission is also persuaded by the OCA presentation, through Whitfield A. Russell, about the need for additional studies and commitments prior to construction approval (Exhibit 15 pages 20 and 21 ; Tr. at 1355, 1365, 1386-88). The Commission advises SPP to review his suggestions

Subsequently was rejected

SIERRA COUNTY

Attachment 4

RETURN TO:
OMNI-MEANS
6121 LAKESIDE DR.
RENO, NV 89503

088228

088228

OFFICIAL RECORDS
SIERRA COUNTY, CALIF.
Recording Requested by
Omni Means
DATE 2-3-88 TIME 4:41
VOL. 111 PAGE 17
BARBARA MARSHALL
COUNTY RECORDER
FEE 18 DEPUTY
Inc Detach

DECLARATION OF PROTECTIVE COVENANTS

PINE VALLEY RANCH

17

261-2871

SIERRA COUNTY

DECLARATION OF PROTECTIVE COVENANTS

PINE VALLEY RANCH

(This document supercedes the Declaration of Protective Covenants, Pine Valley Ranch Unit No. 1, filed in the Official Records of Sierra County, California, on June 7, 1984, Vol. 106, Page 88.)

THIS DECLARATION is made on January 30, 1985, by Sam Jaksick, George Brown, Ruth Brown, James Loverin and Janet Loverin, doing business as Pine Valley Ranch (Declarant). Nothing contained within this Declaration shall be construed as permission to deviate from the provisions and requirements of the Sierra County Code.

RECITALS

Declarant is the owner and developer of that certain real property located in the County of Sierra, State of California known as Pine Valley Ranch, described in the Supplemental Declaration, attached hereto as Exhibit "A" and made a part hereof. This development is rural in nature, therefore prospective purchasers are advised governmental services are available on a limited basis.

Declarant intends to sell and convey the parcels situated within Pine Valley Ranch and before doing so, desires to impose upon them mutual and beneficial restrictions, covenants, equitable servitudes and charges under a general plan or scheme of improvement for the benefit of all of the parcels therein and the owners and future owners thereof.

SIERRA COUNTY

NOW, THEREFORE, Declarant declares that all of the parcels in Pine Valley Ranch and the whole of the development, as hereinafter defined are held and shall be held conveyed, hypothecated or encumbered, leased, rented, used, occupied and improved, subject to the provisions of this Declaration, all of which are declared and agreed to be in furtherance of the plan for the development, improvement and sale of said parcels and are established and agreed upon for the purpose of enhancing and protecting the value, desirability and attractiveness thereof. The provisions of this Declaration are intended to create mutual equitable servitudes upon each of said parcels in favor of each and all other parcels; to create reciprocal rights between the respective owners of all such parcels; to create a privity of contract and estate between the grantees of such parcels, their heirs, successors and assigns; and shall, as to the owner of each such parcel, his heirs, successors or assigns operate as covenants running with the land for the benefit of each and all other such parcels in the development as hereinafter defined and their respective owners, present and future.

I. DEFINITIONS. The following terms as used in this Declaration are defined as follows:

A. "Committee" means the Pine Valley Ranch Architectural Committee.

B. "Declarant" means this Declaration of Protective Covenants and any amendments hereto.

C. "Development" means all that real property situate in the County of Sierra, State of California, described in the Supplemental Declaration and all other real property which may be described in additional supplemental declarations recorded from time to time with

SIERRA COUNTY

the Sierra County Recorder which Development is commonly know as Pine Valley Ranch, consisting in its entirety of nine (9) parcels and land owned in common therewith, and common areas as the same are shown on Supplemental Declarations recorded from time to time.

D. "Improvements" means all buildings, outbuildings, private roads, driveways, fences, retaining and other walls, landscaping, light standards, antenna and any other structures of any type or kind.

E. "Land Owned in Common" means land owned by all record owners of land shown on the Supplemental Declaration, with the exception of Sierra County.

F. "Map" means the maps of the Development as they are from time to time recorded.

G. "Owner" means:

1. Any person or legal entity, including Declarant, who holds fee simple title to any parcel within the Development.

2. Any person or legal entity who has contracted to purchase fee title to a parcel pursuant to a written agreement recorded in Sierra County, California Recorder's Office in which case the seller under said agreement shall cease to be the owner while said agreement is in effect; or

3. A lessee of parcel under a recorded lease from the owner of fee simple title to said parcel for a term of not less than fifty (50) years, in which case the lessor under said lease shall cease to be the owner while said lease is in effect.

H. "Parcel" means any numbered parcel as designated on the map.

SIERRA COUNTY

I. "Single Family Dwelling" means a residential dwelling for the owner and his immediate family, his casual guests and his domestic servants and domestic employees, which dwelling is constructed on a parcel designated in the Supplemental Declaration as a single family residential parcel.

J. "Supplemental Declaration" means:

1. The recorded Supplemental Declaration of Declarant attached hereto as Exhibit "A"; or

2. In the case of parcels being subsequently annexed to the Development, the recorded Supplemental Declaration of Declarant which incorporates the provisions of this Declaration therein by reference.

In either event, the Supplemental Declaration shall include a description of the real property covered thereby subject to the provisions of this Declaration and shall designate the permitted uses of such property.

II. LAND USE. Parcels in the Supplemental Declaration shall be designated therein as to their permissible uses and shall thereupon become subject to the restrictive or other provisions of this Declaration relating to such uses. In the event a use is designated for which no such provisions are contained herein (e.g. single family dwelling, etc.), the same may be set forth in such Supplemental Declaration. Only activities connected with the designated uses may be carried out on any parcel. There shall be no use of parcel other than the designed use.

SIERRA COUNTY

Single Family Residential. Only single family dwellings and such outbuildings as are usually accessory thereto and as may be permitted by the Committee shall be permitted on any parcel. The following restrictions shall apply specifically to such parcels.

1. Minimum Area. Each dwelling constructed shall have fully enclosed floor area (exclusive of roofed or unroofed porches, terraces, garages, carports, guest houses or other outbuildings) not less than 1,600 square feet with the exception of any existing structures as of November 15, 1982.

2. Set-Backs. The front building set-back line will be not less than 60 feet from the front property line. Side yard set-back will be not less than 60 feet. Rear yard set-back will be not less than 60 feet from the rear parcel property line. For parcels which border on U.S. Forestry Service Land, a minimum 400 feet set back will be required on Forest Service property lines unless a variance is approved by Sierra County. If, because of parcel shape or topography, front, side or rear set-backs prove to be impractical, the Architectural Committee may permit variances of set-backs. Variance approval must also be obtained from Sierra County. In no case shall structures be located closer to streams as designated on the Supplemental Declaration than allowed by Sierra County Code, unless a variance is obtained from Sierra County.

III. RESIDENTIAL RESTRICTIONS. The following shall be applicable to all parcels within the development and each owner as to his parcel, covenants to observe and perform the same:

SIERRA COUNTY

A. No temporary structure of any form or type shall be permitted on any lot or parcel. portion of the permanent facilities (such as garage, barn, guest house) may be constructed prior to construction of main dwelling units provided such building or structure is used for storage of construction materials, tools, equipment during construction of main dwelling units commences in not more than six (6) months after completion of said structure. Should vandalism and theft make it necessary for night watchman, such temporary facilities may be provided, with written permission of declarant or Architectural Committee, whichever is in authority at time of request. No trailer, garage, basement, outbuilding or other structure other than the completed main dwelling unit shall be used for temporary or permanent living quarters.

B. Upon commencement of construction of any dwelling unit within the subdivision, all reasonable speed and diligence shall be employed by the owner to complete said construction and said construction will in all cases be outwardly completed in not more than 18 months unless otherwise approved in writing by Architectural Committee prior to start.

C. Other than new structural components approved by the Architectural Committee as herein established, no new, existing, used, previously constructed, or partially constructed structure of any type or nature, including trailer homes, modular homes, or prefabricated homes shall be moved from another place onto the subdivision for any purpose whatsoever.

D. Stream Protection Zones. Stream protection zones shall be designated as being 50' on either side of streams marked on the Exhibit A map. Prohibited activities within the zone shall include where more than one grazing animal per 20 acres per year on sagebrush or where one grazing animal per two acres per year on the irrigated meadowland are grazing on a parcel or an enclosed portion of the parcel, a sturdy fence shall be installed to keep grazing animals out of the zone. Soil disturbance, vegetation removal or the construction or improvement of roads, bridges, or vehicular crossing within the zone shall be conditional uses. Conditional uses shall be allowed upon written approval by the Sierra County after consultation with the Department of Fish and Game.

E. Disposal of Sanitary Waste. All permanent plumbing fixtures, dishwashers, toilets or garbage disposal systems shall be connected to individual sanitary septic systems on each parcel of the development in accordance with county standards. In no case shall septic tanks or leach fields be located closer to streams as designated on the Supplemental Declaration than allowed by Sierra County Code.

F. Fences. There shall be no fences or walls over six (6) feet in height anywhere within the Development without approval. Such approval shall include thatof the Sierra County Building Department. There shall be no chainlink, woven wire, or hogwire within the Development except to backyard pet enclosures and swimming pools as approved by the Committee prior to installation and detailed plans therefor shall be submitted to the Committee as in the case of other structures. Nothing herein contained shall prevent necessary erection

of retaining walls required by topography and approved by the Committee. All boundary fences on each parcel, when abutting the dedicated or private roadway will be either barbed or smooth wire the bottom strand being at least eighteen (18) inches above the ground, mounted on solid colored dark green metal posts or lodge pole pine posts. All fences shall comply with the requirements of Chapter 14, Sierra County Code.

G. Nuisances. No noxious or offensive activities or nuisances shall be permitted on any parcel in the development. No refuse, unsightly or abandoned vehicles, debris, noxious material, discarded personal effects, construction materials not for immediate use, compost materials and similar matter shall be permitted on any parcel or portion thereof. It is incumbent upon all property owners to maintain their lots and yards in a neat, orderly and well groomed manner, whether said lots are vacant or improved.

H. Signs. Other than during construction of houses, no signs, billboards or advertising structures of any kind may be displayed on any parcel except upon application to and written permission from the Committee. The Committee shall not unreasonably withhold permission with respect to signs advertising a parcel for sale, however the Committee may provide such signs of a standard size. and color with space provided for the name and telephone number of the seller or seller's agent, which signs only shall be used if provided.

I. Animals. No animals shall be kept or maintained on any parcel that unreasonably interferes with comfort, privacy or safety of other owners within the Development. Free roaming of domestic dogs shall be prohibited.

J. Garbage and Refuse Disposal. There shall be no exterior

SIERRA COUNTY

burning of trash, garbage or other like household refuse without a permit from the Committee, nor shall any owner accumulate on his parcel junked or unsightly vehicles or litter, refuse or garbage, except in receptacles for such purposes.

K. Antennas. Radio transmitting and receiving antennas for short wave or ham radio and/or satellite broadcast television dish antenna installations will not be installed on any parcel without the express written permission of the Committee. Standard television antennas will be allowed, however, the height will not exceed ten (10) feet above highest point of roof line.

L. Limited Access. There shall be no access to any lot or parcel on the perimeter of the development except from designated streets or roads as shown on recorded maps of the development.

M. Operation of Motor Vehicles. All speed limit and other traffic control signs erected within the Development shall be observed at all times.

N. Water Rights.

1. General: The use of surface waters on these parcels shall be in strict compliance with the Long Valley Creek Adjudication, decree number 12999 entered August 9, 1976 in Book 26 of Judgements, Page 20, Superior Court for Lassen County, California. No alteration from that decree shall be allowed in either manner of use, place of use, or amount of use nor shall any user take any action that will in any way adversely affect the decreed rights of downstream users.

SIERRA COUNTY

2. Use and Control of Reservoirs

ALDABE RESERVOIR

The Aldabe Reservoir lies with within the boundaries of Parcel 8 and therefore Parcel 8 shall have sole use of the water surface of that reservoir subject to the decreed rights applicable to other Parcels. As other parcels are also served water from the Aldabe Reservoir, the owner of parcel 8 shall not in any way alter the dam structure, diversion structure, or spillway for access and maintenance purposes system without the expressed written consent of the owners of other parcels nor shall he in any way change or alter the flow to other parcels as decreed. In no event shall the dam or reservoir be modified in any way so as to retain any more water than allowed through the decree. Furthermore the owners of other parcels shall have the right to use the access of the dam, diversion structure and spillway as these affect water service to those parcels.

LINDQUIST - SOUTH CREEK RESERVOIR

The Lindquist - South Creek Reservoir lies within the boundaries of parcels 2, 3 and 4 and all of these parcels shall have the use of the water surface for recreational activities.

SIERRA COUNTY

The dam structure, diversion structure and spillway shall be the sole property of parcel 3 the owner of which shall have sole right, authority and responsibility for the ownership, operation and maintenance of these facilities. Furthermore, the owner of parcel 3 shall have sole right, authority and responsibility for the use of the reservoir as an irrigation holding and diversion structure and therefore has sole right to adjust the reservoir water surface level for his irrigation purposes. Notwithstanding the above conditions, in no event shall any of the parcel owners in any way alter the dam or reservoir so as to allow that structure to retain or divert more than that amount of water allowed by the decree. Both sources of inflow to the South Creek Reservoir (pipeline and ditch) lie on parcel 2 and 4. The owner of parcel 3 shall have the expressed right to enter parcels 2 and 4 for the purpose of operating and maintaining these inflow structures to whatever degree required so long as he does not interfere with or hinder in any way parcel 2 and 4 surface rights as decreed.

O. Preservation of Archeological Sites. The Pine Valley area has been identified as a potential area for archeologic sites. State policies for preserving artifacts and archeologic sites will be followed precisely to maintain the religious, cultural or scientific value of items found. When artifacts are found, construction activities shall be immediately stopped, pending an assessment by the Sierra County Planning Department.

-11-

28

SIERRA COUNTY

P. The Architectural Control Committee.

1. In order to provide for the orderly development of Pine Valley Ranch and to aid in establishing a unique and prestigious architectural format, there is hereby created an architectural committee which shall be comprised of a least three, but not more than five individuals, at least one of which must be a registered architect, engineer, building designer or contractor. It shall be responsibility of the architectural committee to establish in writing, immediately upon formation, prior to any new construction, Architectural Standards that clearly define what shall not be allowed within Pine Valley Ranch development. Further, it is the intent of this Committee to provide clear and precise guidelines for owners and architects to develop plans and specifications. Further, any single decision of this committee may be overruled by petitioning sixty six percent (66%) or more signatures of parcel owners.

2. The Architectural Committee shall examine and approve or stipulate reasonable changes or alterations in plans for any structure, dwelling unit, outbuilding, pool, hedge, fence or wall to be constructed on any parcel that is not allowed in the Architectural Standards. Said changes or alterations in plans duly submitted to the Committee shall be made only in the best and continuing interest of maintaining a superior tone and quality of architecture throughout the

-12-

29

SIERRA COUNTY

subdivision. In the event of resignation, incapacity, failure or death of any member or members of the Architectural Committee, the remaining member or members shall fill any vacancy or vacancies. Further, the Architectural Committee shall have the power to establish its own internal rules and regulations and procedural details.

3. No dwelling unit, garage, outbuilding, fence, wall, retaining wall, or any type of construction activity shall be constructed, erected, commenced, or placed upon any parcel until four complete sets of plans and specifications thereof, including front, side and rear elevations, along with floor plans for each floor and basement, exterior material and color scheme thereof, and plot plan indicating existing and finished topography of the lot and establishing the exact location of any structure, shall have been first submitted in writing to the Committee for approval, and said approval obtained in writing from the Architectural Committee. Due to the sloping terrain of the Pine Valley Ranch, front, rear and side elevations of every house to be constructed must be submitted to the Architectural Committee clearly showing the finished grade slope of the parcel (as determined from a topographic plot plan) in accurate relation to front, rear and side elevations. Two sets of the Committee approved and endorsed plans shall be forwarded to the Sierra County Building Department with the appropriate fee for their approval prior to issuance of the building permit.

SIERRA COUNTY

Said approval will be affected by the endorsement of the Committee on both sets of plans, one set of which will be retained by the Committee, and one set returned to the parcel owner. Approved plans shall be strictly adhered to. All plans submitted for approval by the Architectural Committee must be accompanied with a Twenty Five Dollar ($25.00) inspection fee, payable to the Committee.

4. If any redecorating or alterations of the exterior of any existing structure be proposed without remodeling or adding to or effecting structural changes in any existing structure, it shall be necessary only to file an exterior color scheme of such changes and to receive written approval of the Committee prior to commencing said work. When exterior redecorations, alteration, additions, or remodeling effect structural changes, the provisions of paragraph 3 must be complied with. Approval or disapproval of this type improvement, repair and redecorating shall not be over 15 days and failure of committee to make such approval shall automatically be deemed full approval.

5. Approval by the Committee of any given plan, alteration of change may be withheld due to noncompliance with any of the specific requirements of the Architectural Standards, or due to reasonable disapproval of the Committee as

SIERRA COUNTY

to the location of the building site upon any parcel, the parcel grading plan, the harmony of proposed structure with the surrounding area and home, and the influence or effect any structure may have upon the view or outlook of adjacent or neighboring homes. At no time shall Committee action in any matter submitted before it takes more than thirty (30) days from the date of said submission. In the event that Committee approval or disapproval is not received at the end of said 30 days, then such submission shall automatically be deemed fully approved. The power to appoint or remove Committee members shall be permanently transferred to the Property Owners upon the sale by declarant of all parcels within the development or at any time prior at the discretion of the declarant.

6. Liability: Notwithstanding the approval by the Committee of plans and specifications neither it, Declarant, nor any person acting on behalf of any of them shall be responsible in any way for any defects on any plans or specifications or other materials submitted to the Committee, nor for any defects in any work done pursuant thereto. Each person submitting such plans or specifications shall be solely responsible for the sufficiency thereof and the adequacy of improvements constructed pursuant thereto. No member of the Committee shall be held liable to any person, whether an owner of a parcel within the development or not, on account of any

SIERRA COUNTY

action or decision of the Committee or failure of the Committee to take any action or make any decision.

7. Principal Office: The principal office of the Committee shall be at 925 West Moana Lane, Reno, Nevada, 89509, or at such other address as the Committee shall notify the Property Owners in writing from time to time.

8. Enforcement: In the event any improvement shall be commenced without Committee approval as herein required or in the event any improvement is constructed not in conformance with plans therefor approved by the Committee, the same shall constitute a violation of this Declaration. The Committee shall also have the power and authority to institute legal or other appropriate proceedings to enjoin or otherwise prevent a violation of the provisions of this section provided, however, that no suit or other proceedings shall be commenced by the Committee after expiration of sixty (60) days from such violation coming to the attention of the Committee in writing. The County of Sierra shall be entitled to enforce this Declaration.

Q. Grantee's Acceptance.

Each grantee or purchaser of any parcel shall, by acceptance of a deed conveying title thereto, or the execution of a contract for the purchase thereof, whether from Declarant or a

SIERRA COUNTY

subsequent owner of such parcel, accept such deed or contract upon and subject to each and all of the provisions of this Declaration and to the jurisdiction, rights, powers, privileges and immunities of Declarant and of the Association. By such acceptance such grantee or purchaser shall for himself, his heirs, personal representatives, successors and assigns, convenant, consent and agree to and with Declarant and to and with the grantees and subsequent owners of each of the other parcels in the development to keep, observe, comply with and perform all of the provisions of this Declaration and shall further agree to the continuation to completion of the development and all parts and projected units therein in substantially the manner heretofore approved by the Sierra County Planning Commission.

R. Severability:

Every provision of this Declaration is hereby declared to be independent of and severable from every other provision hereof. If any provisions hereof shall be held by a court of competent jurisdiction to be invalid or unenforceable, all remaining provisions shall continue unimpaired and in full force and effect.

-17-

34

SIERRA COUNTY

S. Captions:

Paragraph captions in this Declaration are for convenience only and do not in any way limit or amplify the terms or provisions hereof.

T. Term and Amendment:

The provisions of this Declaration shall affect and run with the land and shall exist and be binding upon all parties claiming an interest in the development until January 1, 2000, after which time the same shall be extended for successive periods of ten (10) years each. Prior to January 1, 2000, this Declaration may be amended with the approval of Sierra County by the affirmative vote of seventy-five percent (75%) of the then owners of all parcels in the development entitled to vote and thereafter by a majority of said owners by recording an amendment to this Declaration duly executed by the requisite number of such owners required to effect such amendment. Such amendment is subject to approval by Sierra County.

U. A Fire Hazard Mitigation Plan is hereby adopted. The Plan consist of information presented in Fire Safe Guides for Residential Development in California regarding Fuel Management, Roofing and Access for fire trucks and for evacuation. The Guidelines are included in APPENDIX 3. The County Building Standards will be followed.

-18-

35

SIERRA COUNTY

IN WITNESS WHEREOF, Declarant has executed this Declaration the day and year first above written.

PINE VALLEY RANCH

By: Samuel S. Jaksick, Jr.

By: George J. Brown

By: Ruth A. Brown

By: James R. Loverin

By: Janet I. Loverin

SIERRA COUNTY

STATE OF }
COUNTY OF } ss

On this 13 day of March, 1985, personally appeared before me, a Notary Public, SAMUEL S. JAKSICK, JR., who acknowledged to me that he executed the foregoing instrument.

COLLEEN O. PORTER
Notary Public - State of Nevada
Appointment Recorded in Washoe County
MY APPOINTMENT EXPIRES OCT 30, 1986

Notary Public

STATE OF }
COUNTY OF } ss

On this this 13th day of March, 1985, personally appeared before me, a Notary Public, GEORGE J. BROWN and RUTH A. BROWN, who acknowledged to me that they executed the foregoing instrument.

SHARON A. PROVOST
Notary Public-State of Nevada
Appointment Recorded in Washoe County
MY APPOINTMENT EXPIRES APRIL 12, 1986

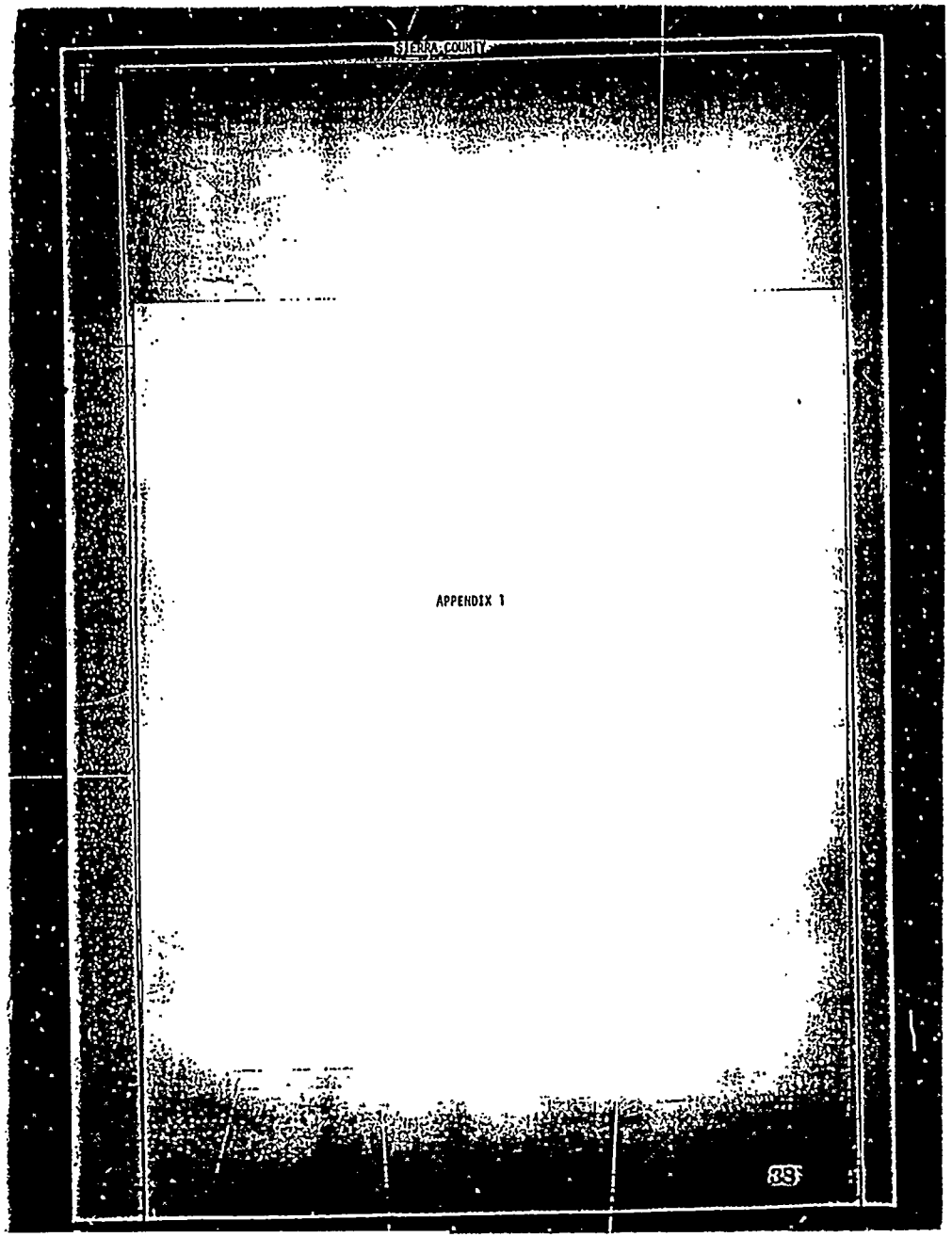
Sharon A. Provost
Notary Public

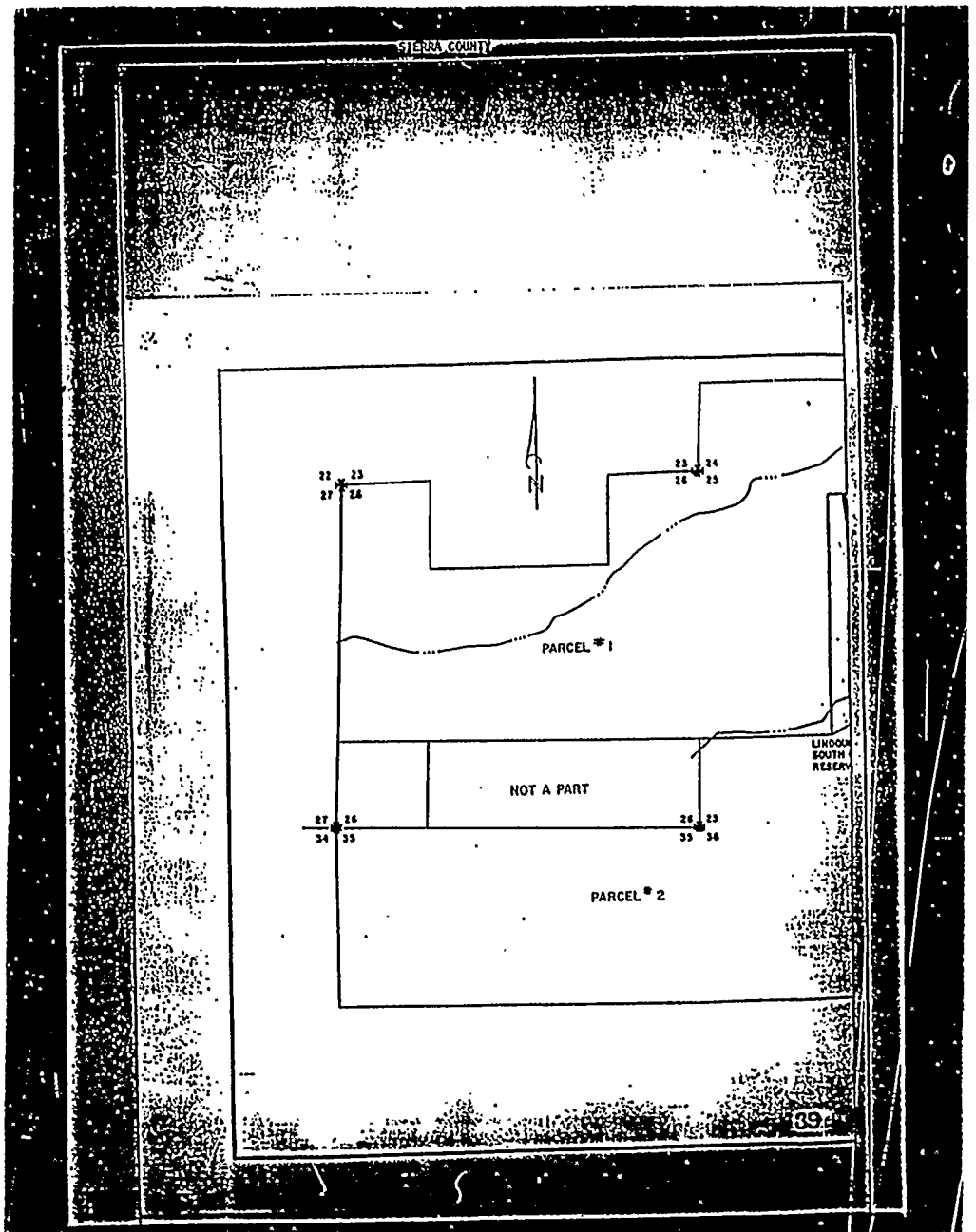
STATE OF }
COUNTY OF } ss

On this 14th day of March, 1985, personally appeared before me, a Notary Public, JAMES R. LOVERIN and JANET I. LOVERIN, who acknowledged to me that they executed the foregoing instrument.

COLLEEN O. PORTER
Notary Public - State of Nevada
Appointment Recorded in Washoe County
MY APPOINTMENT EXPIRES OCT 30, 1986

Notary Public


SIERRA COUNTY
APPENDIX 1
89


SIERRA COUNTY
N
PARCEL # 1
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PARCEL # 2
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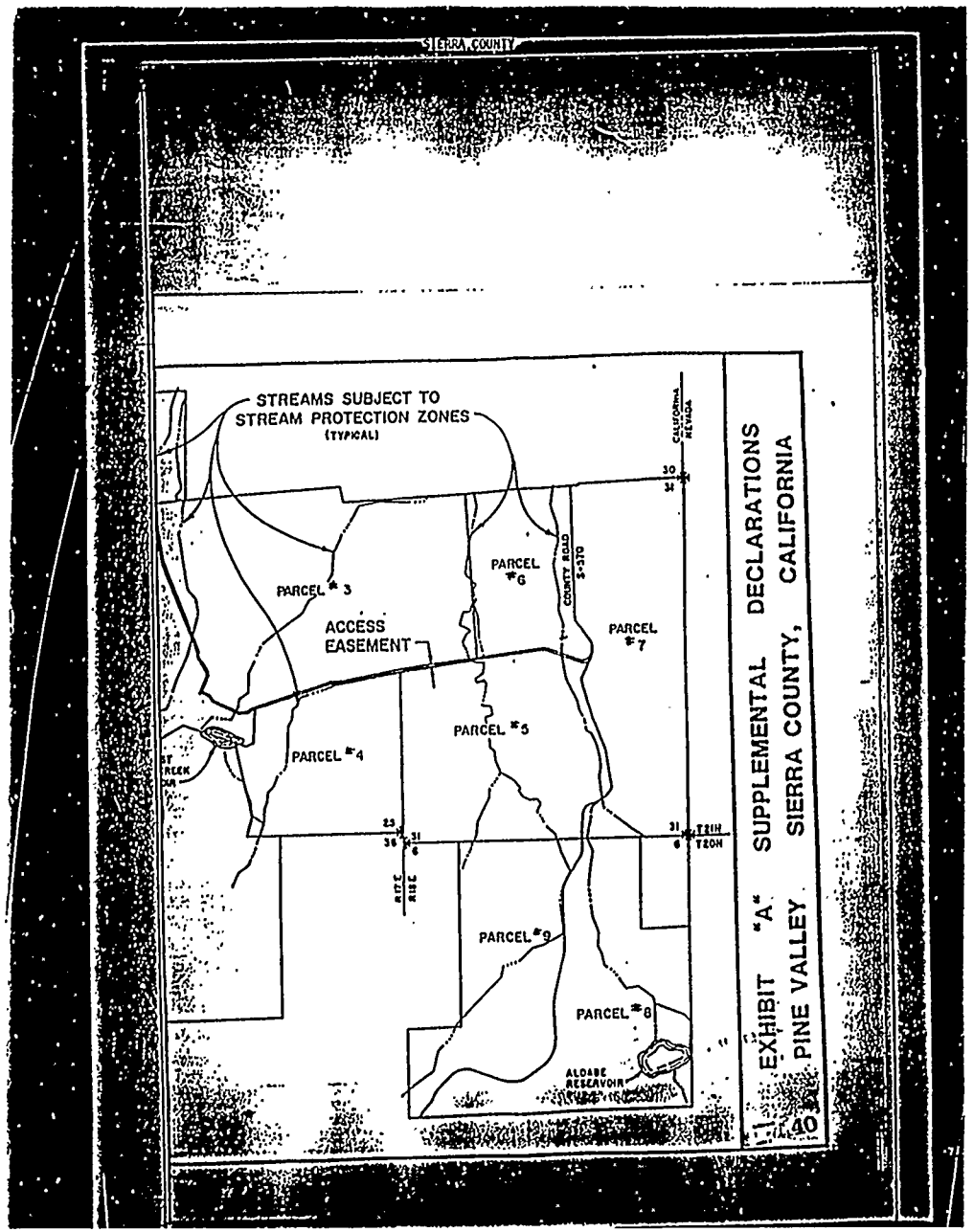
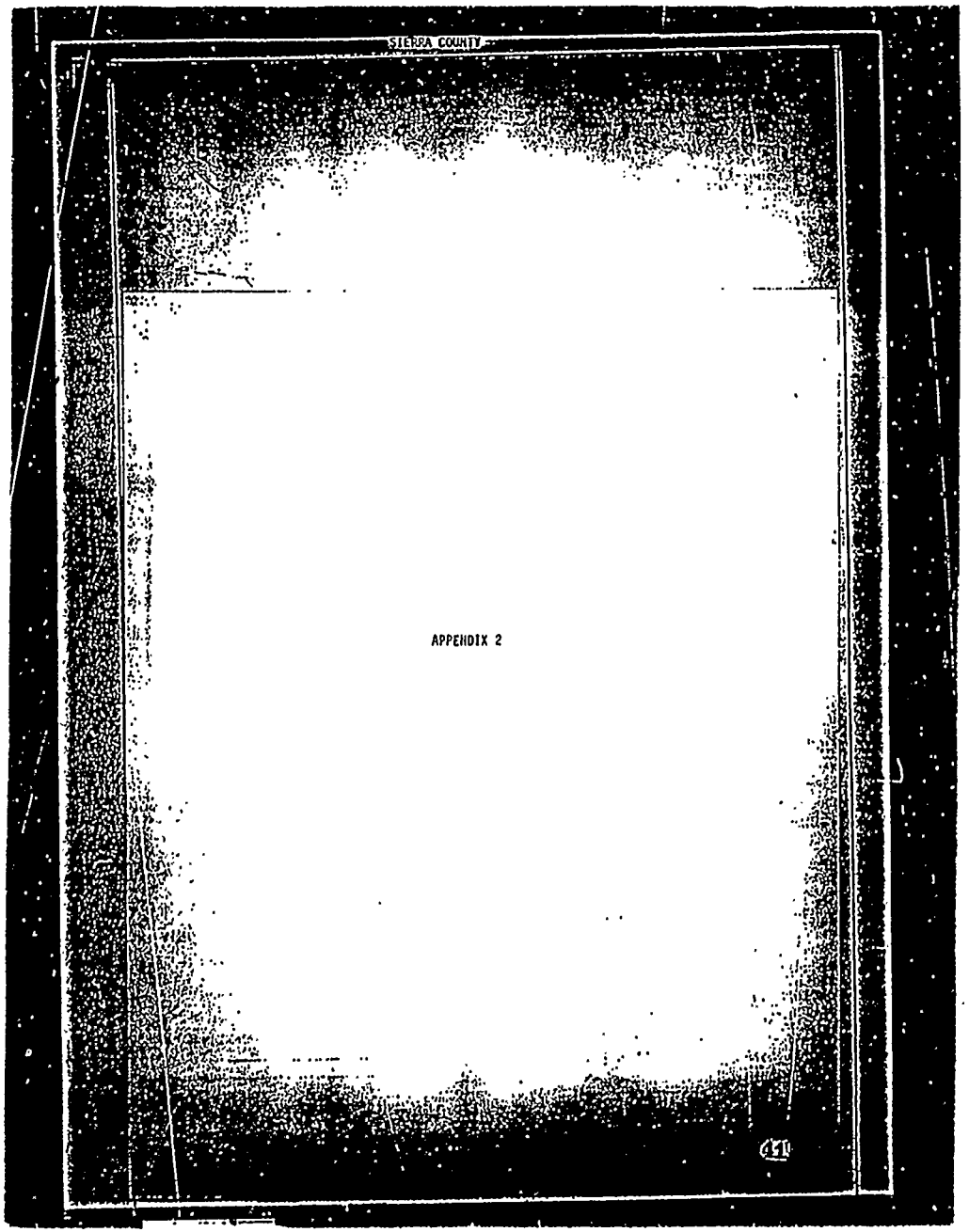

SIERRA COUNTY
STREAMS SUBJECT TO
STREAM PROTECTION ZONES
(TYPICAL)
PARCEL #3
ACCESS
EASEMENT
PARCEL #4
PARCEL #5
PARCEL #6
PARCEL #7
PARCEL #8
PARCEL #9
COUNTY ROAD
S-370
CALIFORNIA
NEVADA
T21N
T20N
R17E
R18E
ALDABE
RESERVOIR
EXHIBIT "A" SUPPLEMENTAL DECLARATIONS
PINE VALLEY SIERRA COUNTY, CALIFORNIA
40


SIERRA COUNTY
APPENDIX 2
41

SIERRA COUNTY

LONG VALLEY CREEK ADJUDICATION

DECREE
No. 12999
SUPERIOR COURT FOR LASSEN COUNTY

LONG VALLEY CREEK STREAM SYSTEM WITHIN CALIFORNIA COUNTIES of LASSEN, SIERRA and PLUMAS

Decree entered August 9, 1976, in Book 26 of Judgments, page 20

1976

CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

42

SIERRA COUNTY

SHEET 2 of PLATE 1

LEGEND
Section Line
Township Line
Property Line
Road
Railroad
Dwellings
Creek
Ditch
Pipeline or Flume
Spring
Point of Diversion
Existing
Proposed
Land Use
Irrigated
Domestic

LONG VALLEY CREEK STREAM SYSTEM WITHIN THE STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

DIABLO MERIDIAN

CALIFORNIA

NEVADA

U.S. BUREAU OF LAND MANAGEMENT

E.M. EVANS ESTATE 18

E.M. EVANS ESTATE 15

GREEN GULCH RANCH INC.

BALLS CANYON

E.M. EVANS ESTATE 11

GREEN GULCH RANCH INC. 14

E.M. EVANS ESTATE

U.S. B.L.M.

L.B.M. PROPERTIES INC.

U.S.B.L.M.

O.C. RANELLI

RANELLI

43

SIERRA COUNTY

APPENDIX 3

SIERRA COUNTY

FIRE SAFE GUIDES FOR RESIDENTIAL DEVELOPMENT IN CALIFORNIA.

ROOFING, ACCESS, FUEL MANAGEMENT

RECOMMENDED FIRE SAFETY STANDARDS

The following standards are intended to be applicable to all wildland developments in fire hazardous areas including subdivisions, large scale housing, planned-unit developments, and recreational areas including development on federal lands. The need for protection of life, property and natural resources may require mitigating measures to reduce the risk of a wildfire to an acceptable level.

Recommendations for individual developments should vary with the degree of fire hazard severity and the combination of available mitigating measures that can be adopted.

Access/Traffic Circulation

Road networks either public or private should provide for safe and ready access for emergency fire equipment. Alternate routes of escape that will safely handle evacuations and emergency equipment should be established. Road and street systems should provide maximum circulation consistent with topography to meet fire safety needs. The following standards are recommended for subdivision developments:

1. Access Routes

   Require at least two different ingress-egress routes:

2. Right-of-Way Road Width

   a. Require a sufficient right-of-way for the construction of two 12-foot traffic lanes, two 8-foot parking lanes and two 10-foot roadside strips on which the vegetation should be managed to prevent fire hazard. Responsibility for keeping roadside strips free of fire hazard should be assigned.

   b. In single or minor subdivision development, the main traffic lane width to all building sites should be at least 16 feet to allow emergency fire equipment access while occupants are escaping a wildfire. Also, turnaround access at the building site should be large enough to easily accommodate fire equipment.

Cul-De-Sac with Proper Road Width and Turnaround

3. Cul-de-Sacs

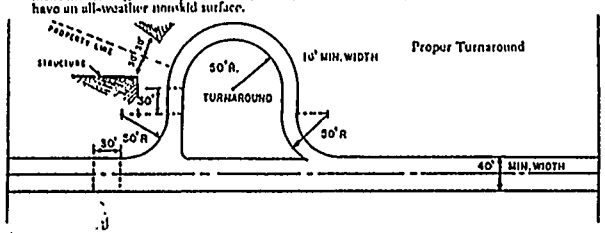
   Limit cul-de-sacs length based on hazard severity classifications to 1,000 foot moderate, 800 feet high, and 600 feet extreme, terminated by a turnaround right-of-way not less than 90 feet in diameter.

9

SIERRA COUNTY

4. Street Grades

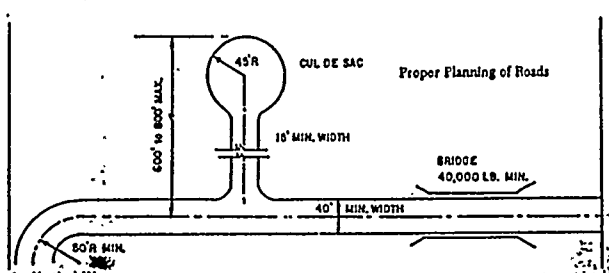
Street grades should be limited to 15 percent except for short distances when topographic conditions make moderate grades impractical. Any road grade in excess of 20 percent no matter how long should have an all-weather nonskid surface.



Proper Turnaround

5. Street Radius

No street, or turnaround road should have a centerline radius or curvature of less than 50 feet.



Proper Planning of Roads

6. Vertical Dips

Vertical curves and dips in the roadway should have a radius of not less than 50 feet.

SIERRA COUNTY

Typical Rural Bridge

7. Bridges

Bridges should have a minimum load of 40,000 pounds (20 tons), and be no narrower than the driving portion of road serving each end. Major ingress-egress roads in subdivisions should have a minimum load limit on bridges of 80,000 pounds (40 tons).

Visible Street Address and Signs

Street, Road, and Building Identification – Names and Numbers

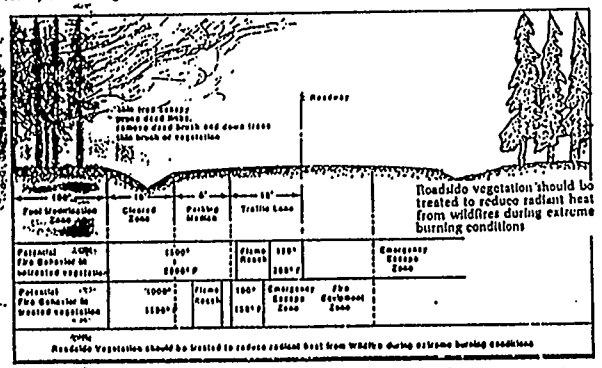
To facilitate fire location and to avoid delays in response, all roads, streets, and buildings should be designated by name or number on signs clearly visible from the main travelled roadway. As used in this section, "roadway" means that portion of a highway or private street improved, designed, or ordinarily used for vehicular travel.

Roadside Vegetation

Roadside vegetation contributing to significant risk should be removed for a distance of 10 feet on each side of the travelled section. In order to protect escape routes from radiant heat caused by wildfires, the native vegetation should be thinned and dead material removed on each side of roads or highways. This may reduce radiant heat from a wildfire to an acceptable level.

Proper Roadside Vegetation Clearance

The clearance distances, type or amount of fuel management desired depends on local conditions, but as a minimum should extend at least 100 feet from the edge of the roadway to be beneficial as a fire defense system. Fire protection agencies can provide fuel treatment directions for planning purposes. Other methods of treatment include pruning specimens of trees, planting ornamental shrubbery and cultivated ground cover such as green grass, ivy, succulents or similar plants provided they do not form a means of readily transmitting fire.



Roadside vegetation should be treated to reduce radiant heat from wildfires during extreme burning conditions

5. Lakes, Ponds, Swimming Pools, Streams or Other Water Sources

Plan for fire equipment access. The equipment must be able to get within 16 feet of these water sources to effectively obtain the water. All plans should have these water fill or drafting sources noted.

Power Utilities System

All new or modified electrical distribution circuits and extensions of existing circuits in fire hazardous areas should be underground if possible.

Roofing

The roof is the most vulnerable part of a building during a wildland conflagration especially a roof that is horizontal because it can catch and hold firebrands carried by strong winds and convection columns characteristic of these fires. Unlike ground fire, a conflagration produces firebrands that travel over and beyond any natural or artificial firebreak and are a distinct hazard to structures as far as a mile away from the wildfire.

1. Tile Roofs

Tile roofs shall be fire-stopped with concrete or equivalent fire-resistive material to preclude entry of flame or embers.

2. Shake/Shingle Roofs

Thousands of homes and other buildings exposed to the threat of wildland fires are roofed either with untreated shakes or shingles or with shakes or shingles that were merely dipped in fire-retardant chemical. In many cases, the treatment has been leached by weathering. These roofs are not only serious hazards to the buildings on which they are installed but also to any other buildings downwind from them which are similarly roofed. Once the roof catches fire, the shakes or shingles peel off and are carried as firebrands by the convection column and wind.

Shake or Shingle Roofs are Fire Hazards

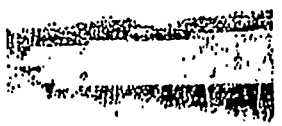
Recognizing this vulnerability to fire from external sources, the Uniform Building Code (UBC) requires "fire-retardant roof coverings" in or near the business sections of cities where property values and hazard to human life are high. A few local jurisdictions have amended the UBC or their own codes to require "Class C", a more fire resistant roofing as defined in UBC Standard 32-7 in hazardous wildfire areas. The zoning designations established for all roofs in the urban/rural interface and wildland areas should be in accordance with the following:

SIERRA COUNTY

Fire Hazard Severity Classification	Type Roofing Required*
Extreme	CLASS A
High	CLASS B
Moderate	CLASS C

*Uniform Building Code - Standard 32-7

Tile Roof



Composition Roof

- Fire Retardent Treated
- Shake/Shingle Roof

3. Roof Sprinkler Systems

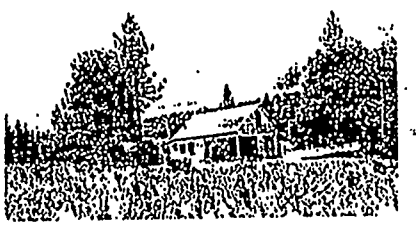
Automatic roof sprinkler systems will not substitute for the required roof covering as these systems are too unreliable.

SIERRA COUNTY

9. Existing Buildings or Structures

Existing buildings or structures need not comply with the provisions of this section except when alterations, repairs, or replacements are made amounting to more than 25 percent of the value of the building or structure to which the various subsections of this section apply.

Existing structures should comply if more than 25% of building, is replaced



Building Spacing and Densities

Structure density and spacing requirements should be based on fire hazard severity classification and mapping.

To provide a reasonable degree of fire safety, building spacing density should be different in mountainous areas, wildlands and rural areas than they are in urban areas because the usual source of ignition of the structure in the wildland or rural setting is usually external.

Flat terrain

Slope and structure density

Slope has an important bearing on fire behavior through its effect on wind conditions and heat radiation. Consequently, and irrespective of vegetation clearance requirements, more space between structures should be required in mountainous areas than on valley floors and coastal plains.

SIERRA COUNTY

Vegetation Clearance

Brush and dense undergrowth in forest areas are a primary hazard to structures. Brush and dense undergrowth ignite readily, burn with intense heat, and spread fire rapidly. Vegetation clearance requirements are necessary to reduce structural exposure to flames and radiant heat and to give residents and firefighters a reasonable chance of protecting structures.

California Public Resources Code (PRC) Section 4291 requires certain minimum clearance and states as follows "Any person who owns, leases, controls, operates, or maintains any building or structure in, upon, or adjoining any mountainous area or forest-, brush-, or grass-covered lands or land covered with flammable material shall at all times do all of the following:

1. **Firebreaks – 30 feet**

   Maintain around and adjacent to such building or structure a firebreak made by removing and clearing away, for a distance of not less than 30 feet on each side thereof or to the property line, whichever is nearer, all flammable vegetation or other combustible growth. This subsection does not apply to single specimens of trees, ornamental shrubbery, or other plants which are used as ground cover, provided that they do not form a means of rapidly transmitting fire from the native growth to any building or structure.

Firebreak around structure

2. **Fuel Modification – 30 feet to 100 feet**

   Maintain around and adjacent to any such building or structure additional fire protection or firebreak made by removing all brush, flammable vegetation, or combustible growth which is located 30 feet

Fuel modification up to 100 feet

to 100 feet from such building or structure or to the property line, whichever is nearer, as may be required by the Director of Forestry when he finds that because of extra hazardous conditions, a firebreak of only 30 feet around such building or structure is not sufficient to provide reasonable fire safety. Grass and other vegetation located more than 30 feet from such building or structure and less than 18 inches in height above the ground may be maintained where necessary to stabilize the soil and prevent erosion.

24

52

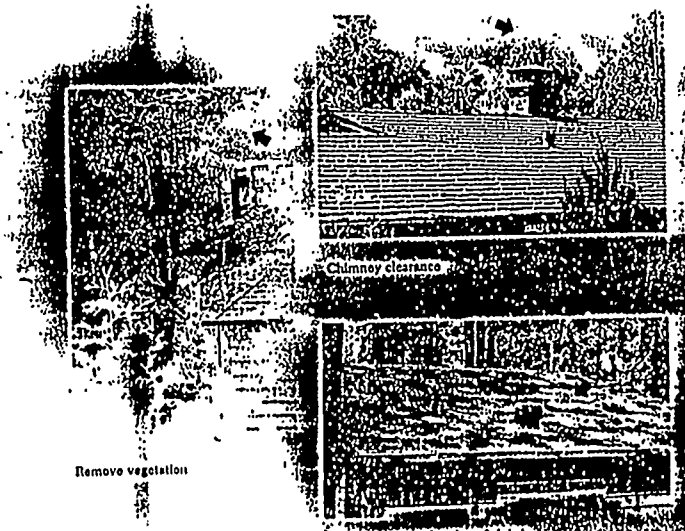
SIERRA COUNTY

3. **Chimney and Stovepipes**

   Remove that portion of any tree which extends within 10 feet of the outlet of any chimney or stovepipe.

4. **Overhanging Vegetation**

   Remove dead or dying wood from any tree adjacent to or overhanging any building.



5. **Accumulated Roof Debris**

   Remove leaves, needles, or other dead vegetative growth from the roof of any structure.

6. **Local Ordinance Adoption**

   In addition to the above, provisions of PRC Section 4291, the following is also recommended and will need local ordinance adoption.

25

08822B

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Attachment 5

3 April 1995

Jan Loverin
Long Valley, California

Dear Jan:

I have had an opportunity to review, in a preliminary way, the cultural resources in the Long Valley area and associated with your property in particular. It seems clear that there are some remarkable built and landscape resources, many of which are eligible for listing on the National Register of Historic Places as a district. Your out buildings in particular appear to date to the earliest period of settlement after 1860. Your brick house, while twentieth century, is probably also eligible for listing, particularly in included in a district nomination. In addition, the use of the land, with its fencing and continued agricultural use, should also be regarded as contributing elements to a National Register district. Such a district could have boundaries to match your property lines, but it would probably be more appropriate to include larger parts of Long Valley since the property of your neighbors appear to preserve the same integrity from the early historic period.

These resources are eligible under criterion A because of their association with an important historic period of development, supplying as they did, agricultural products to trans-continental travelers but also to the growing market supplied by the Comstock mining boom (1859-1880). They are also eligible under criterion C because the buildings show design and construction techniques that date them to historic periods. In addition, the use of the land dates clearly to an historic period in an area where agricultural land use, though once extremely important to that part of the Great Basin, has given way to residential and other commercial development. Long Valley preserves the ambiance of an earlier period in a remarkable fashion.

Proposed development of Long Valley, in the form of transmission lines cutting across the Valley, should include consideration of the effects on this potential district. Any report which defines the Area of Project Effect (APE), as consisting of a narrow strip of land along transmission lines, may fail to take into consideration the potential adverse effect on the historic resources of this valley. It is not unusual that this valley had not been documented in this part of the Great Basin, but that does not make it unimportant. Survey work should include analysis of a broader APE that includes consideration of cultural landscape features and its buildings. Only with this perspective would it be possible to fairly understand all potential effects of this projects on these resources.

Please let me know if you have any questions.

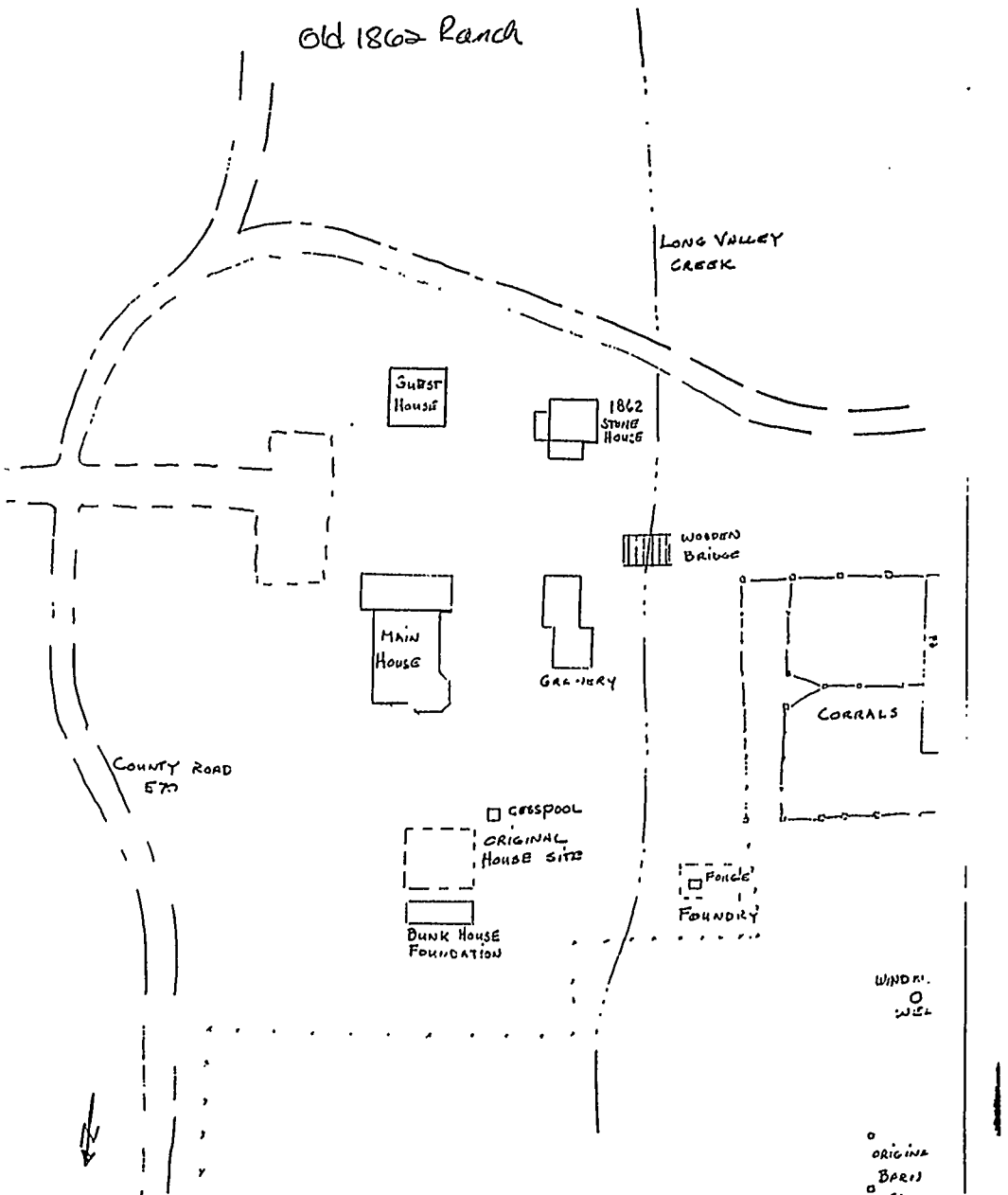
Sincerely,

Michelle McFadden

Michelle McFadden,
Architectural Historian

905 West Sunset Way
Carson City, NV 89703

882-6266



Department of Energy
Bonneville Power Administration
Redmond Customer Service Center
3855 West Highway 126
Redmond, OR 97756

Attachment 6

April 7, 1995

Mr. Dan Silveria, Manager
Surprise Valley Electrification Corporation
P.O. Box 691
Alturas, CA 96101

Dear Dan:

On March 30, 1995, you called me with some concerns regarding Sierra Pacific Power Company's (SPPCo) proposed 345 kV Alturas Intertie Project. The transmission line would span roughly 161 miles from the vicinity of Alturas, California to Reno, Nevada. Currently the project is expected to be rated bi-directionally at 300 MW. The Bonneville Power Administration (BPA) has the option to use up to 110 MW to serve BPA's Northern Nevada transfer loads including Wells Rural Electric Company (WREC) and Harney Electric Cooperative (HEC). Contingent upon agreements currently under negotiation, SPPCo and Washington Water Power (WWP) will use up to 90 MW for transfer between each other. SPPCo will use the remainder for its own use.

Your concerns were related to the benefits provided to Surprise Valley Electrification Corporation (SVEC) and BPA as a result of completion of the project. Please understand that the contracts have not been finalized and that this information is subject to change.

BPA benefits from the project in that WREC and HEC could be served more reliably and at a substantially lower cost. In addition, BPA's interconnection with the project provides some support to the Northwest Intertie during outages. But most importantly, BPA's interconnection with the project will be achieved at essentially no cost to BPA.

You also asked how much capacity would be coming off the 230 kV Malin to Warner line. As I understand today, that could amount to 110 MW for WREC and HEC, and from 50 to 90 MW for SPPCo. The Malin-Warner line has a capability of approximately 500 MW.

I hope this addresses your concerns. If you have further questions or concerns please feel free to contact me.

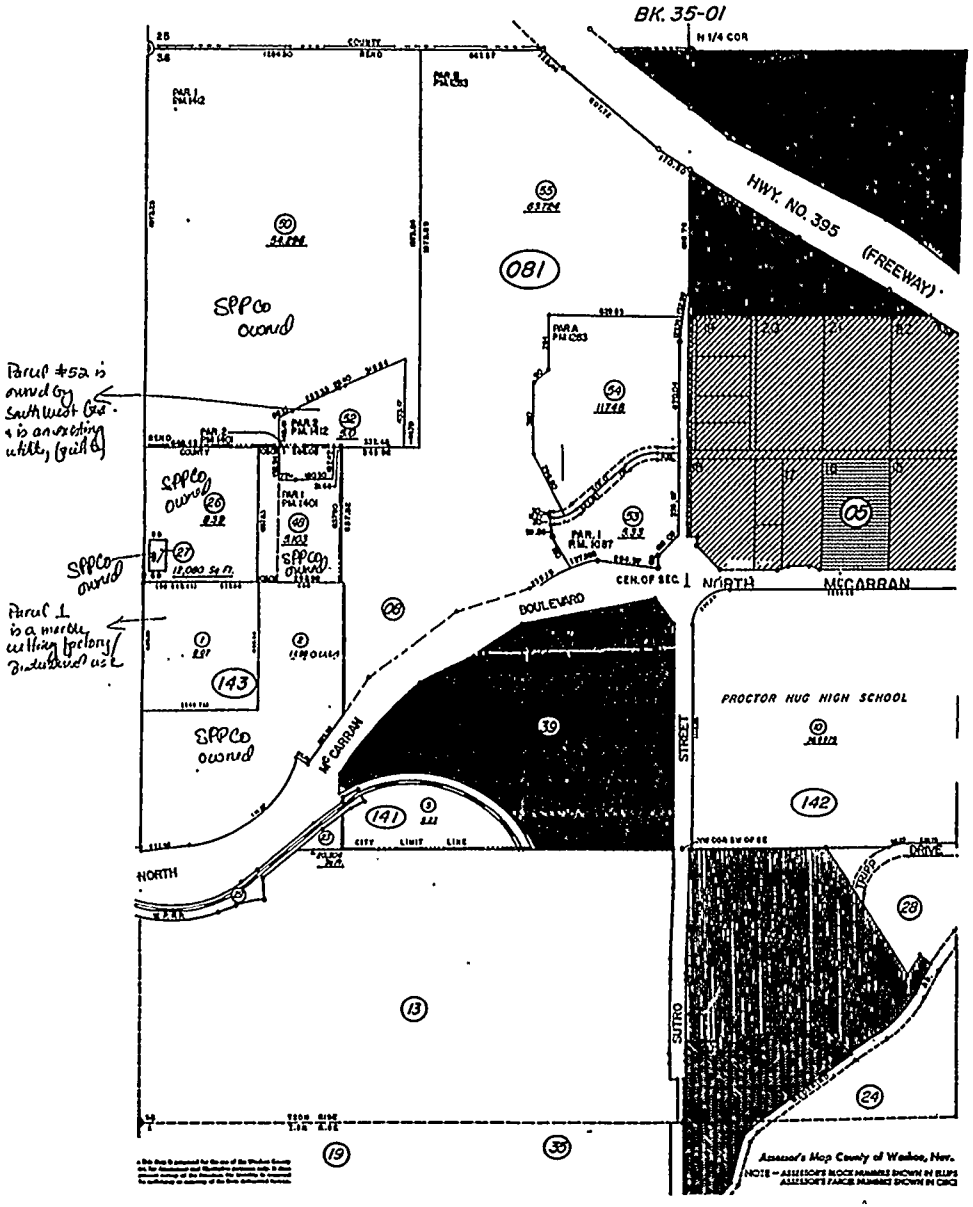
Sincerely,

Daniel E. Bloyer

Daniel E. Bloyer
Account Executive

Attachment 7

N1/2 SEC.36 T20N R19E



Attachment 8

Socioeconomic Information System
POPULATION BY PLANNING AREA

November 28, 1994

The following table shows population for the 12 planning areas covering Washoe County's unincorporated area (see map on the following page). The 1980 and 1990 figures are from the U.S. Census, the 1994 figure is an estimate, and the 2015 figure is a forecast.

PLANNING AREA	1980 CENSUS	1990 CENSUS	1994 ESTIMATE	2015 FORECAST
Forest	1,000	1,500	1,900	2,900
High Desert	600	700	700	900
North Valleys	11,400	13,300	14,200	18,600
South Valleys	4,000	4,900	5,500	6,600
Southeast Truckee Meadows	4,600	5,600	6,200	18,100
Southwest Truckee Meadows	3,500	5,600	7,000	12,200
Spanish Springs	1,300	3,500	6,900	23,600
Sun Valley	8,600	11,300	12,500	16,600
Tahoe	6,200	7,600	8,000	10,300
Truckee Canyon	1,000	1,800	1,900	5,000
Verdi	1,300	2,300	2,600	6,100
Warm Springs	300	600	800	2,900
TOTALS	44,000	58,700	68,100	121,700

Notes:

1. The population estimates are for July 1, 1994.
2. The population forecasts are based on the *Washoe County Consensus Forecast, 1994 - 2015.*
3. The figures do not include any population included in the Reno Sphere of Influence, the Sparks Sphere of Influence, the Northwest Planning Area or the Northeast Planning Area.
4. The sum of the planning areas including the population in the spheres of influence will not add up to the unincorporated estimates submitted to the State Demographer. This is due to a high percentage of building permits occurring in planning areas with a higher occupancy rate than the overall unincorporated occupancy rate. The unincorporated estimates will be revised in conjunction with the State Demographer to reflect this change in occupancy rates for the 1995 estimate.

Attachment 9 April 20th

414

1 MR. BRESLOW: I'm at the tall microphone, I guess.
2 I'm here to represent the City of Sparks in
3 our official position, and that is that we support the
4 environmentally superior route as recommended.
5 I'm not going to say environmentally sound,
6 because nobody wants that darn thing anywhere near them,
7 and it will disrupt people's lives no matter where it
8 goes.
9 But if it went to the alternative through the
10 City of Sparks corridor, the conservative estimate is
11 that in the Satellite Hills and the Vintage Hills
12 subdivisions, conservatively we would have to destroy 64
13 homes and average between 11 and 13 million dollars in
14 extra costs. now at 40 homes,
15 That doesn't include the impacts on Spanish
16 Springs, which is an award-winning, master-planned
17 community. The construction of the first of two golf
18 courses right next to this power line and very upscale
19 community takes place July 1st.
20 Spanish Springs will have 30,000 people in the
21 next 25 years in the Sparks corridor. The county
22 population around that is another 30,000 people.
23 And in the alternative site it will have -- it
24 will impact that entire planned community, but
25 immediately through existing homes we would have to, I
26 guess, have you all buy 64 homes and at an average of a
27 hundred and fifty to a hundred and sixty thousand
28 dollars. That doesn't include any of the homes that are
undocumented - a strategy
used by Sparks planning

Attachment 10

May 25, 1994

California Public Utilities Commission
Ms. Julie Halligan
Project Manager
Commission Advisory and Compliance Division
Environmental and Energy Advisory Branch
505 Van Ness Avenue, Room 3207
San Francisco, CA 94102

Re: CPUC Application No. 93-11-018
Alturas Intertie Project

Dear Ms. Halligan:

After reviewing Sierra Pacific Power Company's Proponents Environmental Assessment Volumes I and II, attending Sierra Pacific's information meetings in January 1994, attending the Sierra County Planning Dept. and Board of Supervisors meetings and the public scoping meetings, The Citizens for the Preservation of Long Valley are OPPOSED to the proposed routing and location of the Bordertown substation.

We are opposed for the following reasons:

I. NEGATIVE DECLARATIONS:

1) The initial proposal for the site of the Bordertown substation (APN # 021-100-12) is located in the Pine Valley Subdivision of Sierra County. The recorded Covenants, Conditions and Restrictions of the Pine Valley Subdivision specifically state that the use of said property is for RESIDENTIAL USE ONLY. A copy of the CC&R's is attached. This site is in direct violation of the predetermined land use and is inconsistent with established Sierra County zoning.

2) Sierra Pacific is now (as of 5/13/94) considering purchasing or trading for the adjoining BLM parcel to the north (APN # 021-090-021). The Citizens for the Preservation of Long Valley are opposed to this location as well, although the northern area of this parcel is more acceptable than the prior parcel - it is still not desirable. We are opposed to both locations for the following reasons:

a) The project is INCONSISTENT with Sierra County's Draft General Plan and is a violation of current open space zoning.

b) The project will degrade the value of adjacent property and will certainly lessen the desirability of ranch and home sales.

c) Sierra Pacific has not identified other possible locations for the Bordertown substation in the PEA. ALL 8 PROPOSED ROUTES UTILIZE THE BORDERTOWN SUBSTATION SITE. Although SPPCo. has now started trying to acquire the BLM parcel, this is not a real alternative. This parcel affects the same people and the same land area. We want SPPCo. to provide us with other distinct alternatives!

d) Sierra Pacific consistently refers to the proposed Bordertown substation site as "existing," but when referring to the proposed substation site near Alturas, it is referred to as a "new" substation site. See, page 50 of PEA, Vol. 1.

For roughly the same size, the two new proposed substation sites were not given equal consideration. The people of Modoc County were originally given four sites to consider, narrowing it down to two; the people of Sierra County were not given any alternative site locations.

e) According to the Electric Resource Plan Sierra Pacific filed in July 1993 with the Nevada Public Utilities Commission (Section 1, p. 15), "Another benefit of the Alturas Project is that it provides the required second strong electrical source to the Reno area. At a minimum, the Bordertown substation option will save an estimated $4 million in 120 Kv expansion and voltage support from Valley Road substation to the North Valley area. It could save as much as $20-25 million if the North Valley growth should cause a 345 Kv expansion from Tracy to Valley Road."

This means that the Bordertown substation will not just provide transmission service but will eventually have distribution capability. If this "second strong electric source to the Reno area" is required for Nevada residents, shouldn't it be based in Nevada?

Even Mr. Olack and Mr. Younkin of Sierra Pacific state that the potential size of the Bordertown substation could reach 20 ACRES! We would like a FULL DISCLOSURE OF THE POTENTIAL DEVELOPMENT OF THIS SUBSTATION, e.g., future interconnections to other utilities, wheeling, distribution, additional phase shifters and transformers, etc.

II. POTENTIAL SIGNIFICANT EFFECTS OF THE PROPOSED PROJECT

1) This area is currently an agricultural environment. The electromagnetic field generated by the 345 Kv line is of concern to cattle ranchers. Inhibited milk production (as covered by "60 Minutes") could cause injuries to animals and a potential loss of income. One rancher in the area is subject to the Williamson Open Space Act, which states that his property can only be used in an agricultural manner. If problems arise, it could be detrimental to his livelihood, since he would not be able to use the property for anything else.

2) The historic significance of Long Valley is evident. Two buildings in the immediate area of the proposed Bordertown substation site have origins in the 1860s, with eligibility on the National Register of Historic Sites possible.

3) According to the Northeast California Information Center/California Archeological Inventory, no historic or cultural survey of the southern end of Long Valley has been done.

4) Sierra County Rd. #570 (aka Dog Valley Rd. or Long Valley Rd.) is scenic and sensitive. The road parallels the Sierra Nevada Mountains and enters into National Forest property with striking visual impact.

5) The Bordertown substation will GREATLY alter the agricultural, historical, and pastoral character of the valley. Industry may be attracted here because of the substation.

III. ALTERNATIVES

1) The EIS/EIR should consider other BLM parcels, already on the proposed route, where surrounding human habitation is nil and therefore mitigation minimal.

a) Specifically, Township 22, Range 17E Section 25 and 24, APN # 021-020-02

b) An alternate route which goes down the east side of the Petersen Mountain Range.

c) In the Stead industrial park, near Lear and Moya Boulevards. This would enable the power source to be nearer to the already existing Stead substation and could be an enhancement to the industrial area. Any distribution potential would be nearer to the load.

IV. MITIGATION MEASURES

If the EIS/EIR establishes that the proposed Bordertown substation site on the BLM parcel has the least impact on the environment, the Citizens for the Preservation of Long Valley would like the following mitigation measures:

1) Require that the Bordertown substation in its current or future size will not be visible from Sierra County Rd. #570. Maintain the scenic beauty, historic context and agricultural landscape by requiring all Sierra Pacific structures will be hidden from view from the Dog Valley/Long Valley Road. This should include such techniques as:

a) strategic placement of facility (again, nearer the

north portion of the parcel would be more acceptable);

b) excavation so that it is removed from ridge lines;

c) berming with LARGE TREES and landscaping so it is visually eliminated;

d) no transmission structures on crest of hills;

e) use the lowest heights possible for towers, bridges;

f) where facility may be visible from County Rd., build stone walls to maintain historic context;

g) use impact minimizing paints, dull finishes on all structures;

h) restrict expansion of substation;

In closing, the Citizens for the Preservation of Long Valley hope that the California Public Utilities Commission and the BLM will consider our proposals. The Reno-Alturas Intertie will not directly BENEFIT US, YET WE WILL HAVE A DISPROPORTIONATE SHARE OF THE NEGATIVE IMPACT. The Reno-Alturas Intertie has many functions, several mentioned in the PEA and several not mentioned, but discovered in the 1993 Electric Resource Plan. These future developments must be addressed NOW to insure "a decent home and satisfying living environment for every Californian." (Calif. Env. Quality Act, §21000)

Sincerely,

Citizens for the Preservation
of Long Valley

Jan and Jim Loverin	Dr. and Mrs. Jerry Zebrack
Pat Hodges, M.D.	Myrna Moore
Joyce Stoffey	Vickie Rosen
Buck and Bea Sumpter	Dan and Debbi Jost
Richard and Louise Powell	Andy and Rhonda Sallaberry
Jan Dawson	Dan and Katie Price

California Native Plant Society

Shasta Chapter, CNPS
PO Box 990194
Redding, CA 96099
June 1, 1995

Org./Citizen Groups Comment Set 29

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

SUBJECT: Alturas Transmission Line Project: State Clearinghouse Number 92042001, CPUC Application Number 93-11-018, BLM Case Number CACA-31406

Dear Ms. Halligan and Mr. Humm,

The following are our comments regarding the Sierra Pacific Power Company, Alturas Transmission Line Project Draft EIR/EIS.

Page B-27, Construction Schedule:
There is the concern of construction activities being conducted during the time frames shown in Figure B.2-13. The movement of heavy equipment into the area and the construction of roads during the spring could result in compaction of soils and degradation or destruction of vegetation. There is the main concern of compaction of clayey soils. The mitigation measures for soils on page C.6-41 do give guidelines for construction activities and if followed the result could be a delay in construction activities for one to three months. Sierra Pacific should not rush the project but follow the respective lead agency guidelines.

Delaying construction activities could eliminate the need for extensive ripping of soils, increase the success of revegetation work, and reduce the likelihood of invasion of exotic noxious weeds, especially medusahead. Also, revegetating severely compacted clay soils will most likely be impossible. OC. 29-1

Section B.2.3.2, page B-29:
We are pleased that all construction activities will be prohibited within the exclusion zones. Our concern is that the public will use off-road vehicles in sensitive plant communities and/or sensitive plant populations. An example is the Alturas volcanic gravel plant community. In areas with repeated disturbance there are no or very few rare plant populations to be found. Repeated ORV use will most likely destroy the sensitive plants, and the community will be invaded by exotic plants such as cheatgrass (*Bromus tectorum*), alyssum (*Alyssum* spp.), and male buttercup (*Ranunculus testiculatus*). Section C.3.2.2.2 does address off-site compensation, but there is no provision for mitigation of damage caused by ORV use after the project is complete. Furthermore, off-site compensation will not create new sensitive plant communities nor will it bring back extant populations of rare plants. There should be some means of either permanently blocking ORV use (areas like the Alturas volcanic gravel are very open with few natural barriers and ORVs can easily go around any temporary barrier), or the powerline should avoid these areas entirely. OC. 29-2

Page C.3-4, last paragraph:
The second sentence indicates that low and black sagebrush are found on the same sites. In most cases they are different plant communities found in different locations of the Modoc Plateau. Perhaps putting the word "or" between the two will suffice. Did you mean to say "bluebunch wheatgrass (*Pseudoroegneria spicata*)" and not *Festuca idahoensis*? Idaho fescue usually grows with big sagebrush scrub, western juniper, and ponderosa pine or jeffrey pine communities. Bluebunch wheatgrass should be used. OC. 29-3

Section C.3.2.2, Environmental Impacts and Mitigation Measures

We question the "temporary loss of habitat" to plant communities such as the Alturas volcanic gravels and volcanic vertisol low sagebrush scrub and to sensitive plants such as Suksdorf's milkvetch, Henderson's lomatium, Holmgren's skullcap, and spiny milkwort. Is there documented evidence that disturbance such as that which will occur from powerline construction will only result in temporary habitat loss? We do not want the powerline to be an experiment for reclamation on native plant resources if we do not know the end result, especially for Federal candidate plants and CNPS-listed plants. OC. 29-4

Construction activities and overland travel, which page C.3-55 says are mutually exclusive, have cumulative effects and together they can result in permanent loss of sensitive plant communities and plant populations. Combine this with noxious or exotic plant invasions and the effects are increased. OC. 29-5

We would like to see avoidance of all five sensitive plant communities and of CNPS List 1B and 2 and Federal Candidate 2 plants. We realize that Mitigation Measures B-1 through B-6 and B-8 partially address our concerns, but offsite compensation will not bring back permanently lost plant resources. OC. 29-6

Page C.3-81
The Shasta Chapter is very concerned about the introduction of non-natives, especially listed noxious weeds, into plant communities along the powerline corridor. We request that the Shasta Chapter be given the opportunity to review all plans addressing noxious weed control and to provide input into the implementation of this plan. OC. 29-7

Appendix E.3
We request that the Shasta Chapter be able to review the Community and Habitat Restoration Plan when it is complete. We would like the Plan to incorporate CNPS policy and guidelines for restoration of native plant resources. OC. 29-8

Sincerely,

Donald Burk, Rare Plant Coordinator
Shasta Chapter, CNPS

DB:MD

Dedicated to the preservation of California native flora

JUN 05 1995

SIERRA CLUB
CALIFORNIA

May 30, 1995

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Org./Citizen Groups Comment Set 30

Dear Ms Halligan and Mr Humm:

DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT FOR THE ALTURAS 345 kV TRANSMISSION LINE PROJECT (CPUC NO. 93-11-018, BLM NO. CACA-31406)

The Transmission Line Committee of the Sierra Club California has reviewed the Draft Environmental Impact Report/Statement (DEIR/S) for the proposed Alturas 345 kV transmission line project. The Sierra Club believes the DEIR/S to be inadequate in that it fails to provide a consistent and thorough process for identifying and studying the constraints and/or opportunities of alternate routing and generating solutions and in that it fails to sufficiently examine the validity of the Proponent's Primary Objectives. The DEIR/S fails to demonstrate how the Proposed Project will significantly benefit the people of Nevada to such a degree unobtainable by any other alternative or combination of alternatives so that it justifies the major adverse environmental and land use impacts on California.

PRIMARY OBJECTIVES

The document identifies the three primary goals of the Proponent as increased Sierra Pacific Power Company (SPPCo) import capacity, improved reliability for the Reno/Lake Tahoe area and additional access to Pacific Northwest Power. The justifications are the need to meet projected increases in load, WSCC criteria for reliability and the assumption of low cost surplus power from the Northwest. Either by ommission - there is no examination of the future costs or availability of Northwest power; no consideration given to increasing the use Demand Side Management(DSM) - or admission - the DEIR/S states that reliability criteria can be met by non-Project sources (A.6.8.2) and that other transmission routes can satisfy all the major Project objectives (C.14.1, p.C, 14-3) - the DEIR/S does not demonstrate the necessity of the Proposed Project in order to attain the stated objectives. Increased import capability is considered the most fundamental objective of the Proposed Project(ie, import with specific linkages). So much so that the DEIR/S routinely rejects alternatives because they OC. 30-1

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are not the Proposed Project. It would follow, then, that a major component of the project would be wheeling and spot market purchases. The DEIR/S fails to adequately consider the benefits and impacts of such uses of new transmission. OC. 30-1

CEQA

The DEIR/S identifies six areas of Class 1 significant CEQA impacts, including two, visual resources and land use and recreation, for which no mitigation is available. There are, however, additional significant CEQA impacts which the DEIR/S does not address. The Proposed Project would conflict with the environmental plans and goals of the communities where it is located; the Sierra County Board of Supervisors, the City of Alturas, the Sierra County Planning Commission and the Modoc County Planning Commission have all adopted statements of opposition to the Proposed Project based on the negative impacts the Project would have on their environmental goals. The Proposed Project would, in Alturas and Reno, disrupt and divide the physical arrangement of the community. The location of a large phase shifter at Border Town and the document's reference to the need to service potential growth in the North Valley area (A 21) are indications of some of the potential for expansion of development consequent to the Proposed Project. The DEIR/S fails to raise or examine the growth inducing impacts of the line. The DEIR/S section on Visual Resources creates, and fails to resolve, a conflict as to whether or not the remoteness of some segments results in significant visual impacts. The Proposed Project's impact is not felt to be significant for segments A01-HSO and HSO1-ANP2 as there are few visitors to those areas; however, the document acknowledges that in remote recreational areas "expectations for unimpaired scenic quality would typically be greater"(p C.13-30). The Project, if built as proposed, would run through a portion of the Skedaddle WSA and is, as noted in the DEIR/S, therefore in conflict with Federal regulations. OC. 30-2 OC. 30-3

CORRIDORS/GARAMENDI

The Sierra Club participated in and supports the California Energy Commission's Transmission System and Right of Way Planning process. Senate Bill 2431 required the CEC to "recommend policy options for cost effectively and efficiently creating new transmission rights of way with the least adverse environmental and operational impacts. The legislation specifies that planning and siting of new transmission facilities be pursued in the following order: 1)The use of existing right of way should be encouraged by upgrading existing transmission facilities where technically and economically feasible. 2)Expansion of existing right of way should be encouraged whenever construction of new OC. 30-4

CPUC/BLM, p.3

transmission lines is required. 3)New right of way should be created when justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency" (Transmission System and Right of Way Planning for the 1990's and Beyond, CEC, March, 1992, P.4). The DEIR/S fails to acknowledge the California legislation (2431) regarding transmission priorities and the Proposed Project contravenes the intent of the legislation and of the CEC's recommendations for utility practices. Nor does the document acknowledge the recent formation of a voluntary utility transmission issues organization, the Western Regional Transmission Association (WRTA) and what affect, if any, the WRTA might have on SPPCo's proposal. OC. 30-4

TIME CONSTRAINTS

As SPPCo forecasts that, as early as the summer of 1997, a 120 kV line may exceed its design power carrying capability and as SPPCo states it is unable to operate within prudent WSCC criteria, the DEIR/S (C.14.2.1, p. C.14-6) uses time constraints as a reason to reject a number of otherwise viable alternatives (those listed in Table C.14-1, except the Nevada Route Alternative). However, as the DEIR/S does not consider the likely and timely (1997) addition of the power from Pinon Pine Power Plant, the rejection of alternatives due to time constraints is questionable. OC. 30-5

ALTERNATIVES

As mentioned earlier, the DEIR/S suffers from a failure to provide a consistent and rigorous system of analysis. A not uncommon example of this failure is the statement: "Under the no Project Alternative, the hydrological impacts described above would not occur; however, similar impacts would be realized in other areas as the Applicant augments their existing system" (ES-30). Similar such undocumented and speculative statements are made in regard vis the alternatives to other project impacts (at 4.3.2, ES-20, 4.7.2, ES-33, 4.8.6, ES-34 as examples). It is noted that the LADWP and the Pacific DC Intertie corridors are "each capable of reasonably achieving all of the (major) project objectives.."(C.14.1,pC14-3). They are, however, rejected as they are not the Proponent's Preferred Project. The DEIR/S is also deficient in its examination of alternative routes in that it does not resolve a basic flaw in the Preferred Project which is that most of the forecasted additional load is located east of Reno (load centers which would best - "the more obvious solution" as the DEIR/S notes at A-20 - be served by the rejected OC. 30-6

CPUC/BLM, p.4

alternate routes) and yet the "east-west bottle neck" which it identifies as a basic constraint in the system would not be alleviated by the Proposed Project and thus remains a constraint for the imported Alturas power. OC. 30-6

GENERATION

The discussion of generation options suffers from the same lack of systematic anaylsis which flawed the discussion of routes. "However, generation additions at the proper locations could provide improved service reliability to the Reno/Lake Tahoe area....Further, if the generation addition was an inexpensive source of power, it could diminish the benefit of access to inexpensive power in the Pacific Northwest. However, it is unlikely that new generation could compete with the inexpensive sources in the Northwest since the cost per kilowatt for native generation is expected to be substantially higher than Pacific Northwest hydroelectrical power (p A-36)." This rejection of the potential benefits of generation is based on unfounded and highly speculative assumptions. These unsubstantiated assumptions regarding the cost and availability of Northwest power are compounded by the failure to include any information from or analysis of the Federal System Operation Review (SOR) EIS for the Columbia River or any consideration of the possibility that Northwest power is presently oversubscribed. OC. 30-7

The DEIR/S is deficient in that it does not analyze the cost/benefit ratio of Demand Side Management (DSM) which would reflect the direct environmental benefits of DSM or the potential for a significant increase in energy due to expanded DSM programs. The Sacramento Municipal Utility District, as an example, generates far more energy through DSM than does SPPCo. Nor does it examine the cost/benefit of additional gas generation or the impact of the Tuscarora Gas Line on generation costs. OC. 30-8

The DEIR/S fails to give adequate consideration to the impact of the Pinon Pine Power Plant, rejecting it as an alternative as 1)it provides no direct access to Pacific Northwest Power (although it could obviate the need for such access), 2)does not improve Reno reliability and 3)"...this project would exist whether or not the Alturas Project is approved"(B.3.4.4). Fort Churchill, an additional 70 MW, is likewise rejected as it would not access the Northwest, although it would improve reliability for Reno. Wind energy is acknowledged as competative and as a source of reliability but is eliminated as, "...wind energy is a method of generation, not transmitting electric power" (B-65). Solar and geothermal are likewise dismissed (B-66). OC. 30-9

CPUC/BLM, p.5

ADDITIONAL TRANSMISSION AND GENERATION

As the DEIR/S ignores ungoing voluntary and regulatory efforts to coordinate transmission planning it likewise fails to examine potential and likely long term impacts of the Proposed Project on California transmission even though SPPCo (PSC Docket No 93-4001) agreed that extension of Alturas transmission capability from the Captain Jack substation to the Warner substation would enhance the Alturas project. The DEIR/S also fails to examine the consequences of the large phase shifter to be located at Border Town and the potential it represents for future impact on California transmission. OC. 30-10 OC. 30-11

Although, as mentioned, the document does not examine the System Operation Review EIS and the real possibility that Northwest hydro power will be heavily impacted by proposed salmon mitigations, it does note that "Major changes in Columbia River system operations are being considered...(which)...would affect the availability of low cost hydroelectric power for SPPCo." If then the Proposed Project cannot deliver Northwest hydro power, the energy source for the line would be coal-fired plants in Wyoming and Idaho. Thus the truly disasterous environmental consequence of the Proposed Project would be the increased burning of coal in the northern rockies. And yet, the DEIR/S fails to consider either the consequence of the loss of hydro power as a source to its primary goal of importing Northwest hydro power nor the severe environmental impacts of opening the Reno market to the additional coal-fired energy that would replace the unavailable hydroelectric power. OC. 30-12

Thank you for the opportunity to comment.

Sincerely,

Allan Eberhart

Allan Eberhart
Sierra Club California

KRONICK MOSKOVITZ TIEDEMANN & GIRARD

June 2, 1995

JUN 05 1995

Ms. Judy Halligan/Mr. Peter Humm
CPUC/BLM
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30423 Canwood Street, Ste. 218
Agoura Hills, California 91301

Org./Citizen Groups Comment Set 31

Re: Comments on Draft Environmental Impact Report/Environmental Impact Statement Sierra Pacific Power Company Alturas Transmission Line Project

Dear Ms. Halligan and Mr. Humm:

These comments on the Sierra Pacific Power Company Alturas Transmission Line Project Draft Environmental Impact Report/Environmental Impact Statement ("DEIR/S") are submitted on behalf of Green Gulch Ranch, a general partnership. Green Gulch Ranch encompasses approximately 2,900 acres approximately 12 miles north of Reno, Nevada off U.S. Highway 395, on the California/Nevada border. Approximately 2,220 acres of the ranch are located in Sierra County, California in the area known as upper Long Valley. The proposed transmission line will cross a portion of this property, and the property is immediately adjacent to the proposed Border Town Substation. The remaining approximate 680 acres of Green Gulch Ranch are located in Washoe County, Nevada.

The California Environmental Quality Act ("CEQA"), Public Resources Code Section 21000 et seq., mandates that an environmental impact report be prepared and certified before approval by a state agency or commission of any project that may have a significant effect on the environment. (Pub. Res. Code § 21100(a).)[1] It is well established that the purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effects which OC 31-1

[1] The National Environmental Policy Act, 42 U.S.C. § 4321 et seq., is the federal counterpart to CEQA. (*City of Davis v. Coleman*, 521 F.2d 661, 678 (9th Cir. 1975); *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 201.) Therefore, the comments contained in this letter are generally applicable to the Bureau of Land Management's consideration of the DEIR/S pursuant to NEPA.

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a proposed project is likely to have on the environment. (Public Resources Code §§ 21060.5 and 21061; *Environmental Planning and Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350, 354.) The DEIR/S falls significantly short of providing the California Public Utilities Commission (CPUC), the Bureau of Land Management (BLM) and the public with a sound and accurate document. Contrary to the provisions of CEQA, which requires preparation of a clear, concise document based on independent analysis, the DEIR/S is: (1) unnecessarily cumbersome to use; (2) saturated with inaccurate statements; (3) based on unverified analysis by the project proponent, Sierra Pacific Power Company ("SPPCo"); and (4) incomplete. Specifically the DEIR/S is flawed in the following respects: OC 31-1

Crucial to the CEQA mandate that avoidable significant environmental damage be substantially lessened or avoided when feasible is the requirement that an environmental impact report include a detailed statement setting forth alternatives to the proposed project. (Public Resources Code § 21100(a)(6); *Citizens for Quality Growth v. City of Mt. Shasta* (1988) 198 Cal.App.3d 433, 443-445.) Environmental impact reports "must produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned," (*San Bernardino Valley Audubon Society, Inc. v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750-751) and an agency must use reasonable diligence to investigate project alternatives. (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564-565.) "The key issue is whether the selection and discussion of alternatives fosters informed decision making and informed public participation." (Guidelines for Implementation of California Environmental Quality Act ("CEQA Guidelines"), 14 California Code of Regulations § 15126(d)(5).) OC 31-2

The DEIR/S analysis of project alternatives is wholly inadequate. The DEIR/S purports to analyze eight different route alignments. (DEIR/S at B-49; B-69-B-80.) In fact, however, each of these "alternatives" are within a single corridor and merely represent a minor change in the location of a segment of the transmission line. Moreover, all eight of the "alternatives" provide for the construction of a substation at Border Town; the only alternative to the Border Town Substation site analyzed by the DEIR/S is another Border Town site just to the south of the primary site. (DEIR/S at B-80.)

Alternatives to a Border Town site were considered during the scoping phase, but each was eliminated. With respect to one alternative, the DEIR/S states that "during the scoping process,

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Ms. Judy Halligan/Mr. Peter Humm
June 2, 1995
Page 3

several requests were made to investigate the possibility of expanding the existing North Valley Road Substation on the north side of Reno to accommodate equipment planned for the proposed Border Town Substation," but this alternative was eliminated because:

> Site expansion at the North Valley Road Substation would require a large amount of cut and fill operations. This earthwork and additional costs of relocating existing utilities in the expansion area would result in costs that are estimated by SPPCo to be $8 million more than developing the Border Town Site. For this reason, the alternative is considered economically infeasible. In addition, this alternative could also involve significant impacts on earth resources (geology, soils, hydrology). Finally, cut and fill on the hill side would be visible from the Reno/Sparks metropolitan area and U.S. 395, imposing further visual impacts. (DEIR/S at B-62.)

OC. 31-2

This rationale is inadequate. First, there is no explanation of why an increase in cost of $8 million makes the alternative economically infeasible. In addition, the estimate of $8 million is inaccurate. Indeed, evidence submitted by SPPCo during the CPUC hearing on a Certificate of Public Convenience and Necessity for the proposed project suggests that the costs of moving the equipment planned for the proposed Border Town Substation to the existing North Valley Road Substation could be as little as $3 million. In a memorandum dated January 28, 1994, from Don Carson to Roger Olack, in evidence as Exhibit DNL-R2 states:

> The use of a 20 to 30 foot tier at N. Valley Road Substation in the northward expansion would significantly reduce the earthwork costs and possibly eliminate the need for relocating nearby facilities. However, Border Town would still be the cheaper option, by roughly $3,000,000.

If the total project cost were increased from the estimated cost of $120 million to $123 million (to facilitate the relocation of the Border Town Substation) the project, according to the testimony of SPPCo employees, would still be cost effective. Because the DEIR/S concludes that operation of the proposed Border Town Substation

KRONICK MOSKOVITZ TIEDEMANN & GIRARD

Ms. Judy Halligan/Mr. Peter Humm
June 2, 1995
Page 4

will have a significant, unmitigable environmental effect (DEIR/S at C.13-44) and California public policy requires elimination of such effects (Public Resources Code § 21002), the DEIR/S must consider the North Valley Road Substation alternative further if it is to be certified as adequate.

The rationale for elimination of this alternative is also inadequate because it is based entirely on analysis performed by SPPCo. In fact, the rationale for the elimination of many alternatives to the proposed project is based solely on an analysis by SPPCo. Inasmuch as it is the responsibility of the public agency to use reasonable diligence to investigate project alternatives, eliminating project alternatives based solely on an analysis by SPPCo is inappropriate.

OC. 31-2

In *Laurel Heights Improvement Assoc. of San Francisco, Inc. v. Regents of the University of California* (1988) 47 Cal.3d 376, 399-407, the California Supreme Court strongly emphasized the requirement that an environmental impact report contain "meaningful detail" in its analysis of alternatives. In this situation the DEIR/S states that its analysis of transmission alternatives is cursory because "these projects have only been preliminarily studied by SPPCo for their technical feasibility and estimated cost, . . ." (DEIR/S at B-81.) However, an environmental impact report must provide meaningful detail in its analysis of alternatives. This madate cannot be avoided because the project proponent has conducted only preliminary studies of the alternatives. The state agency or commission responsible for preparation and certification of an environmental impact report has a duty to prepare an analysis which will permit meaningful consideration of project alternatives and perform further studies if necessary.[2]

OC. 31-3

[2] Assuming that the analysis of project alternatives satisfied the requirements of CEQA, the analysis would still be inadequate under NEPA. An environmental impact statement prepared pursuant to NEPA must "devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits." (40 CFR § 1502.14(b).) The analysis of project alternatives contained in the DEIR/S hardly satisfies this requirement. In addition, NEPA expressly imposes on a federal agency the duty to obtain additional information, through original research, if required to prepare an adequate analysis. (40 CFR § 1502.22.)

KRONICK MOSKOVITZ TIEDEMANN & GIRARD

Ms. Judy Halligan/Mr. Peter Humm
June 2, 1995
Page 5

An additional area in which the DEIR/S is inadequate is its discussion of growth inducing impacts. An analysis of such impacts is required by section 21100(a)(4) of CEQA, and it must:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. . . also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in the area is necessarily beneficial, detrimental, or of little significance to the environment.

(CEQA Guidelines § 1526(g).)

The DEIR/S concludes that by providing a means to transmit a substantial amount of additional electrical power into SPPCo's service area, the proposed project could significantly contribute to growth in this area. (DEIR/S at B-4.) However, with respect to the Border Town Substation the DEIR/S states: OC. 31-4

> If expansion does occur at the Border Town Substation, a likely outcome would be that the expanded facility could serve urban growth in the North Valley area. It appears that the action of expanding the Border Town facilities would not stimulate growth, but would accommodate growth planned or projected by the local jurisdictions. Given that no definite plans have been designed for future facility expansion, any further identification of impacts associated with the expansion would be speculative at this time. (DEIR/S at E-5.)

The fact that expanding the Border Town facilities would "accommodate growth planned or projected," rather than stimulate growth, does not eliminate the need for the DEIR/S to assess the growth inducing impacts of the proposed project. While an environmental impact report need not describe in detail each and every conceivable development scenario, it must analyze the impacts in relation to the most probable development patterns. (*Antioch v. Pittsburgh* (1986) 187 Cal.App.3d 1325, 1327.) Because the proposed project "could foster" population growth and the construction of

KRONICK MONKOVITZ TIEDEMANN & GIRARD

Ms. Judy Halligan/Mr. Peter Humm
June 2, 1995
Page 6

additional housing in the North Valleys area, the DEIR/S cannot pretend none will occur; the DEIR/S must assume the general form, location and amount of such development that now seems reasonable to anticipate and evaluate that development. (*Id.*) OC. 31-4

The DEIR/S fails to provide the CPUC, BLM and the public in general with detailed information about the effects of the proposed project for the additional reason that it contains many erroneous statements of fact. As an example, the DEIR/S repeatedly states that the proposed new transmission line "would require" a new substation at Border Town. (DEIR/S at B-2; B-15, D-20. However, a substation at Border Town is not "required." All of the primary and secondary objectives of the proposed project could be achieved through expansion of the existing North Valley Substation to accommodate the facilities planned for Border Town, albeit at a greater cost. OC. 31-5

The DEIR/S also states that the two alternative Border Town Substation sites "are surrounded by commercial and industrial zoning." (DEIR/S at C.9-18.) This statement is patently wrong. Both substation sites at Border Town are in Sierra County, and are surrounded by areas zoned as agricultural open spaces. (Personal communication with Julie Griffith, Planner, Sierra County Planning Department.) Although there are two industrial sites near the Border Town sites, both are located in Washoe County, Nevada. OC. 31-6

The DEIR/S is also factually wrong when it states, "the majority of the Proposed Project (approximately 140 miles) would travel in a general north-south direction through northeastern California, starting a few miles northwest of the City of Alturas to the California-Nevada state line near Border Town, Nevada. From Border Town, the line would travel in a southeasterly direction until it reaches Reno, Nevada." (DEIR/S at B-3.) In fact, the proposed route of the transmission line intersects the California/Nevada border near Honey Lake, more than 30 miles north of Border Town. The transmission line reenters California approximately 11 miles to the south of its first interception with the California/Nevada border, and remains on the east side of Highway 395 until it reaches Border Town. At Border Town the transmission line crosses Highway 395 to the west for only one apparent reason, to enter the proposed Border Town Substation site. OC. 31-7

An alternative route which would have maintained the transmission line in Nevada after the first point at which it intersects the California/Nevada border was not considered because SPPCo had selected a substation site at Border Town to accommodate its long range plans, which include future interties. (Proponent's

KRONICK MONKOVITZ TIEDEMANN & GIRARD

Environmental Assessment.) To adequately inform the CPUC, the BLM and the public in general, the DEIR/S should analyze a route which remains in Nevada at all points south of Honey Lake. OC. 31-7

The DEIR/S is also incomplete in several respects. Principal among these is that it does not analyze how placement of a substation at Border Town will affect existing land uses. This omission is significant given that one of the two "main components" which comprise the analysis of the proposed project's land use impacts is "identification of the potential inconsistencies with federal, state and local policies and regulations." (DEIR/S at C.8-21.) As indicated above, Sierra County, has zoned the area surrounding the Border Town Substation sites as agricultural open space. In addition, the Sierra County general plan has designated the area as agricultural open space. (Personal communication with Julie Griffith, Planner, Sierra County Planning Department.) Within these general plan and zoning designations, public utility facilities may be conditionally permitted uses. However, public utility facilities, particularly a substation, may be incompatible with the zoning classification and the actual historical use of the surrounding area, ranching. This potential incompatibility must be addressed by the DEIR/S, if it is to be certified as adequate. OC. 31-8

The DEIR/S is incomplete for the additional reason that it in some places refers the reader to other sections of the document which are either non-existent or do not contain the analysis described. For instance, on page C.13-68, the reader is referred to section C.13.1.3.15 and section C.13.2.6.16, neither of which exist. The DEIR/S, on page B-20, states "section E-3, . . . discusses the potential for future expansions at the Border Town Substation and the growth-inducement implications." However, when the reader refers to section E-3, it states that the growth inducement implications are not analyzed because "given that no definite plans have been designed for future facility expansion, any further identification of impacts associated with the expansion would be speculative at this time." (DEIR/S at E-5.) The DEIR must be revised to ensure that cross-references within the document are meaningful. OC. 31-9

The DEIR/S also uses confusing terminology. Throughout the document there are references to environmental effects which are "adverse, but not significant." (DEIR/S at C.1-3.) Public Resources Code Section 21068 defines "significant effect on the environment" as "a substantial, or potentially substantial adverse change on the environment." The DEIR/S' use of the "adverse, but not significant" classification of impacts is confusing in light of this definition. OC. 31-10

The DEIR/S in its present form is inadequate. Significant additional analysis must be performed, particularly with respect to project alternatives, if the document is to serve its fundamental purpose, to provide the CPUC, the BLM and the public in general, with detailed information about the effects which the proposed project is likely to have on the environment. Further, if the public is to have confidence in this environmental review document, it must contain facts and independent analysis, not just bare conclusions or opinions based on nothing other than SPPCo's analysis.

The CPUC's and BLM's consideration of these comments are appreciated.

Sincerely,

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD
A Professional Corporation

Thomas W. Birmingham

THOMAS W. BIRMINGHAM
Attorneys for Green Gulch Ranch

TWB:djc
197379.1

cc: Edmund T. Allen, III
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Jan Loverin

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OF COUNSEL:
NANCY MOSS GHUSN

OF COUNSEL:
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Reno, Nevada 89509

Org./Citizen Groups Comment Set 32

June 2, 1995

RECEIVED
JUN 05 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

RE: COMMENTS OF THE BORDERTOWN RESIDENTS ON THE ALTURAS TRANSMISSION LINE DRAFT ENVIRONMENTAL IMPACT REPORT/STATEMENT (DEIR/S)

CPUC APPLICATION NUMBER 93-11-018
BLM CASE NUMBER CACA-31406

I. IDENTIFICATION AND LOCATION OF THE BORDERTOWN RESIDENTS

This letter, as well as any attached exhibits, constitute the written comments of the Bordertown residents on the Alturas Transmission Line Draft Environmental Impact Report/Statement (DEIR/S). The Bordertown residents reside just to the east of the California/Nevada State line and the proposed alternative segment WCFG will traverse directly in from of the Bordertown residents. The exact location of the Bordertown homes and property is more accurately depicted on Exhibit "A" attached hereto. Although the Bordertown residents reside in Washoe County, it has been established on record during the proceedings in Susanville, California, that the Bordertown residents are located within Long Valley which extends across the California/Nevada State line.

OC 32-0

As depicted on Exhibit "A" attached hereto, the WCFG proposed alternative route will place the transmission line directly in front of the Bordertown residents. Specifically, the WCFG route as proposed, would require the placement of at least four (4) if not more towers consisting of an "H" frame tubular construction ranging in height of 70 to 130 feet, equivalent to a building ranging from 7 to 13 stories tall. The following list sets forth the names and addresses of all the Bordertown residents and the approximate location of the proposed WCFG alternative segment to them:

1. Ray and Nancy Gerdes
   300 Gerdes Avenue
   Sparks, Nevada 89433

The Gerdeses own undeveloped acreage in Bordertown, Nevada. The location of their property is approximately 300 feet from the center of the proposed WCFG route and approximately 200 feet or even less from the edge of the WCFG proposed route. Their property is designated as No. 1 on Exhibit "A".

2. Edward, Barbara and Ryan West
   1460 Bordertown Drive
   Reno, Nevada 89506

The center of the proposed WCFG alternative route is approximately 400 feet from the West residence. It is estimated that the center of the WCFG proposed route is less than 300 feet from there property line. The edge of the WCFG proposed route alternative is approximately 200 feet or less from the property line. The West residence is designated as No. 2 on Exhibit "B".

3. Earl and Cynthia Branham
   1400 Bordertown Drive
   Reno, Nevada 89506

The center of the proposed WFCG alternative route is approximately 400 feet from the Branham residence. The Branham property line is approximately 300 feet from the center of the WCFG proposed route and less than 300 feet from the edge of the WCFG proposed route. The Branham residence is designated as No. 3 on Exhibit "A".

4. Connie Van Dyke
   5 Sierra View Road
   Reno, Nevada 89506

Ms. Van Dyke's residence is approximately 500 feet from the center of the WCFG alternative route. Her property line is approximately 300 feet, or less, from the distance of the center of the WCFG route and less than 300 feet from the edge of the WCFG route. The Van Dyke residence is designated as No. 4 on Exhibit "A".

5. Jeff & Terri Bond
   10 Sierra View Road
   Reno, Nevada 89506

The Bond residence is located approximately 900 feet from the center of the WCFG route. Their property line is approximately 600 feet from the edge of the WCFG alternative. The Bond residence is designated as No. 5 on Exhibit "A".

6. Three Rentals: Property owned by Larry Evans

Although Mr. Evans does not reside in Bordertown, he owns three residences which are currently rented. These residences would be located approximately the same distances from the WCFG alternative as the Bond property. The Evans properties are designated as No. 6 on Exhibit "A".

7. Edward & Kathryn Silva
20 Sierra View Road
Reno, Nevada 89506

The Silva residence will be located approximately 800 feet from the center of the WCFG route. The property line is located approximately 600 feet from the center of the WCFG route and approximately 500 feet from the edge of the WCFG route. The Silva residence is designated as No. 7 on Exhibit "A".

8. Chris & Pamela Page
24 Sierra View Road
Reno, Nevada 89506

The distance of the Page residence and property from the WCFG route is essentially the same as the Silva property. The Page residence is designated as No. 8 on Exhibit "A".

9. Leo and Janet Wheatley
28 Sierra View Road
Reno, Nevada 89506

OC. 32-0

The location of the Wheatley residence and property line to the WCFG route is approximately the same as that of the Page property. The Wheatley residence is designated as No. 9 on Exhibit "A".

10. Charles Parrotto
36 Sierra View Road
Reno, Nevada 89506

Mr. Parrotto's residence and property line is approximately the same distance from the WCFG route as the Page Property. The Parotto residence is designated as No. 10 on Exhibit "A".

11. Edward and Patricia Anderson
25 Sierra View Road
Reno, Nevada 89506

The distance of the Anderson residence would be located approximately 600 feet from the center of the WCFG route. Their property line would be approximately 400 feet from the center and 300 feet from the edge of the WCFG route. The Anderson residence is designated as No. 11 on Exhibit "A".

12. W.C. & Jean Wheatley
15 Sierra View Road
Reno, Nevada 89506

The Wheatley residence and property line would be approximately the same distance for the WCFG route as the Anderson residence and property line. This Wheatley residence is designated as No. 12 on Exhibit "A".

As reflected above, it is clearly evident that several of the properties of the Bordertown residents are located within 300 feet or less, and is some cases less than 200 feet, of the proposed WCFG alternative route. In addition, many of the remaining residences are well within 400 feet. It is real apparent that the WCFG route poses significant potential health effects associated with electric and magnetic fields (EMFs). The proposed height and width of the "H" frame tubular towers would also have a significant visual impacts on the Bordertown residents. Moreover, if the WCFG alternative is adopted, the location of the transmission line is likely to substantially reduce the property values of the Bordertown residents. These issues will be addressed in greater detail as set forth below. In order to mitigate the significant potential health effects resulting from the EMFs and the visual impacts, the Bordertown residents are proposing various alternatives that will be discussed in greater detail below which would not increase costs or pose any engineering concerns.

OC. 32-0

II. LACK OF NOTICE TO BORDERTOWN RESIDENTS

In November of 1993, Sierra Pacific Power ("Sierra") filed its application with the CPUC to construct and operate the Alturas Transmission Line. In accordance with the CPUC's procedures, the application proceedings were bifurcated. The need and necessity issues were addressed in hearings in Susanville, California which took place in May of 1995. The environmental concerns were separately addressed in the DEIR/S prepared by the Aspen Group, and a draft was issued on June 21, 1994. Prior to the issuance of draft report, public scoping meetings were conducted in Susanville, Alturas, and Loyalton, California and in Reno/Sparks, Nevada in May of 1994. None of the Bordertown residents attended any of the public scoping hearings nor provided written comments because none of them were aware of the proposed Alturas Transmission Line project. The Bordertown residents only learned of the transmission line by happenstance sometime in either late March or early April second hand from some Long Valley residents who reside in Sierra County. As a result, the comment period for the DEIR/S study was extended by 30 days to June 2, 1995 to provide the Bordertown residents additional time to submit their comments. In addition, the Bordertown residents have participated as a formal party in the hearings in Susanville, California held from May 22, to May, 25, 1995 to address the need and necessity issues. The participation of the Bordertown residents in the Susanville hearings marked the first time the residents participated in the application approval process. This is evidenced by the draft of the DEIR/S study since it does reflect that the CPUC is aware of the close proximity of the WCFG proposed alternative route to the Bordertown residents.

OC. 32-1

III. ELECTRIC AND MAGNETIC FIELD ("EMF") POTENTIAL HEALTH RISK

The draft DEIR/S reflects and refers to numerous EMF studies that have been recently conducted. It is imperative to keep in mind that the studies have only recently been conducted and it may be necessary to study the effects of EMF's on a long term basis. However, it is equally evident that the studies raise sufficient concerns that EMFs could have a potential harmful effect on the health of residents who live within a close proximity of a transmission line such as the magnitude of the proposed Alturas Transmission Line of 345 kv. Although the EMF studies may not be scientifically conclusive at this time, it is real apparent that they raise real and legitimate fears of those residents located in close proximity to transmission lines. In fact, the draft DEIR/S recognizes these concerns as reflected on Page 15 of the Executive Summary:

> In order for the Proposed Project, or any transmission or generation alternative, to improve service reliability into the Reno/Lake Tahoe area, connection to SPPCO's North Valley Road Substation would be required. This need is based on existing limitations of the Tracy-to-North Valley connections and projected load increases in the Reno/Lake Tahoe area. For each Transmission Alternative identified in order to access the North Valley Road Substation, the route would likely need to cross the severely constrained rapidly growing area of the City of Sparks. This growing area is also located within the Truckee Meadows Air Basin, a non-attainment air basin for both State and Federal and ambient air quality standards. This routing could result in significant property ownership constraints and potentially significant land use, visual, and air quality impacts. In addition, given that the alternative would be traversing an urban area, electric and magnetic field (EMF) concerns would be significant.

OC. 32-2

The Executive Summary on page 35 as states as follows:

> While there are no regulations in California or Nevada that regulate EMF's, there are few states that do have regulations that are limiting electric and/or magnetic field exposures at the edge of transmission ROWs. These regulations limit field levels of new lines to the same levels that occur along ROWs of existing lines. With the exception of the residential electric field standard 1 kv/m in Montana, all configurations (except the 345 kV H-frame structure) meet the standard. However, since the proposed project involves passage near very few residential areas, this standard may not applicability to this project.

It is real evident that the EMF concerns are taken into consideration in determining the routing of the transmission line. However, the draft DEIR/S is under the impression that very few residents would be effected and appears to discount the EMF concerns. However, it is interesting to note that Sierra Pacific proposes to use the H frame structure as reflected in its Environmental Assessment Report which do meet standards currently in place. The acknowledgment of the failure of the H Frame structure to meet current standards should raise serious and significant concerns with adopting the WCFG route as proposed.

Although the EMF studies themselves may not necessary be conclusive, the significant concerns have been raised and it would be imprudent to discount such concerns on the basis that these studies are inconclusive. In fact, the easier solution would be to exercise "Prudent

Avoidance" by routing the transmission line to a safer distance from residential areas such as Bordertown. Therefore, as provided below, the Bordertown residents are proposing alternative routings which would mitigate the EMF concerns. Studies have shown that the incidents of childhood leukemia increases where residential neighborhoods are located near voltage lines from anywhere from 345 kv to 700 kv. The incidence of adult brain tumors also increases in residential neighborhoods located near similar transmission lines. There are a number of children who make up the Bordertown residents which would directly expose them to the increased possibility of attracting leukemia. Moreover, it should be noted that the only access road to and from the Bordertown residents is a dirt road that runs parallel and directly next to the transmission line.

OC. 32-2

V. VISUAL IMPACT AND ADVERSE EFFECT ON PROPERTY VALUES OF THE BORDERTOWN RESIDENTS

It is also real apparent that in the draft DEIR/S, another factor taken into serious consideration is the potential visual impacts of the routing of the proposed transmission line. In fact, as reflected on page 9 of the Executive Summary, the BLM recommended alternative segment ESVA to mitigate significant visual impacts in Secret Valley along U.S. 395 in the Tule Patch Rest Stop. In addition, alternative segments S and U where proposed to avoid visual and land use impacts in Lassen and the Red Rocks area.

It is interesting to note that on page 42 of the Executive Summary, the conclusion is reached that segment WCFG from WN05 to WN08 would result in significant, unmitigable visual impacts, but the remainder of alternative segment WCFG would result in adverse but non-significant visual impacts. In fact, the portion of segment WCFG form WN09 to WN10 is the portion of the alternative route which would run directly in front of the homes of the Bordertown residents. All of the homes of the Bordertown currently face west directly looking onto Long Valley located in Sierra County, California. Long Valley is a beautiful pristine valley. Rising above and beyond the Valley of Toiyabe National Forest and the Valley contains the only eastern entrance to Dog Valley and the Toiyabe National Forest recreational facilities. Adopting the WCFG alternative as proposed would provide a significant adverse visual impact on the Bordertown residents. Looking out from their homes, there view would be obstructed by H Frame tubular structures of heights from anywhere to 70 to 130 feet. Moreover, these H Frame tubular tower structures would be only located from a few hundred feet of some of the residents. It is hard to imagine that any residential area or any area along the route could have a greater adverse visual impact than the proposed WCFG route between the points of WN09 and WN10.

OC. 32-3

In addition to the adverse visual impacts noted above, consideration should also be taken into account for the adverse economic impact the proposed WCFG alternative would have on the property of the Bordertown residents. Although as noted above, the EMF studies may be inconclusive, the fact remains that the perceived concerns over EMFs would substantially reduce the property values of the Bordertown residents. Again, adopting the alternatives proposed by the Bordertown residents would mitigate the economic impact on property values.

VI. ALTERNATIVE ROUTES PROPOSED BY THE BORDERTOWN RESIDENTS

Though it would be the preference of the Bordertown residents that the transmission line not be located in Long Valley, the Bordertown residents propose the adoption of the following alternatives which are listed in order as to preference:

1. Existing Segment W Proposal

The first preference of the Bordertown residents is the use of the W segment in lieu of the WCFG segment. This segment would have the greatest mitigation in reducing the EMF concerns as well as the visual impacts and potential reduction in property values. Moreover, it should be noted that this was Sierra Pacific's proposed route. It is the understanding of the Bordertown residents that the WCFG was proposed by the California Department of Fish and Game due to the effects on wildlife. However, it is the understanding of the Bordertown residents that the Long Valley Creek has never contained any fish at least in the Bordertown area. Moreover, the Long Valley Creek branches into a eastern and western fork. The eastern fork does not contain any water flow and the western fork only runs for a minimal period of time, approximately three (3) months per year. This year the western fork of the creek has only more water in it due to the substantial wet winter. Therefore, the impact on wildlife would be minimal or non-existent, or at least no different than the proposed WCFG segment.

During the proceedings in Susanville, it should be noted that Mr. Owens, the routing engineer for Sierra Pacific, testified that crossing any creeks would pose no unique engineering problems or increase construction costs. Although the effect of wildlife should be taken into consideration, it appears that the overall concerns of the Bordertown residents should take precedence.

OC. 32-4

2. Proposal WN07

The second preference of the Bordertown residents is an alternative route which for discussion purposes herein and will be designated as WN07. During the hearings in Susanville California, discussion was had concerning re-routing the proposed transmission line by usage of the combination of WCFG route and the W route. Specifically, at the point of WN07, the transmission route would continue in a westerly direction until it intersected with the W segment route and then continue into the Bordertown Substation. A map designating the proposed route is attached hereto as Exhibit "B". Mr. Owens testified during cross-examination that this alternative route would not pose any unique engineering problems, nor would it increase construction costs. In fact, Mr. Owens testified that each angle point costs between $56,000.00 and $68,000.00. Re-routing the line as proposed would could most likely in fact save construction costs by eliminating angle points. In addition, this route would have a nominal impact on the Long Valley residents but would provide sufficient distance to mitigate the EMF concerns, the visual impact and the potential impact on property values of the Bordertown residents.

3. Alternative WN09 Segment

The third preference of the Bordertown residents would be the adoption of the WN09 segment identified on the map attached hereto as Exhibit "C". This route would again utilize

a combination of the proposed WCFG and the W route. This route would contain a WCFG route from WN05 to WN09. From WN09 the transmission much like the WN07 proposal would traverse in a westerly direction until it intersected with the proposed W segment. From the point where it intersects with the W segment it will continue along the original W segment proposal into the Bordertown Substation. Again, this route would have a nominal or little effect on the Long Valley residents and would substantially mitigate the EMF concerns, visual impact, and property value effects on the Bordertown residents.

OC. 32-4

This proposed alternative was not discussed during the proceedings in Susanville, California. However, based on the previous testimony of Mr. Owens, it is unlikely that this proposed alternative would pose any unique engineering problems or increase any of the construction costs.

VII. COMMENTS OF THE BORDERTOWN RESIDENTS

Enclosed and attached hereto are the individual comments of the Bordertown residents identified as Exhibit "D".

SUMMARY

The Bordertown residents have offered reasonable and viable alternatives to re-direct the routing using the existing W segment or re-direct the routing by using a combination of the W and WCFG segments to substantially mitigate the potential adverse impacts on the Bordertown residents with a nominal or little effect on the Long Valley residents located in Sierra County, California. The alternatives that the Bordertown residents propose also take into consideration the concerns by the California Department of Fish and Gaming. Therefore, there appears no reason why the adoption of any of the proposed alternatives suggested by the Bordertown residents would not be a satisfactory resolution to the potential adverse impact on the Bordertown residents.

Respectfully Submitted this 2nd day of June, 1995.

Steven F. Bus, Esq.

Attorney for the
Bordertown Residents

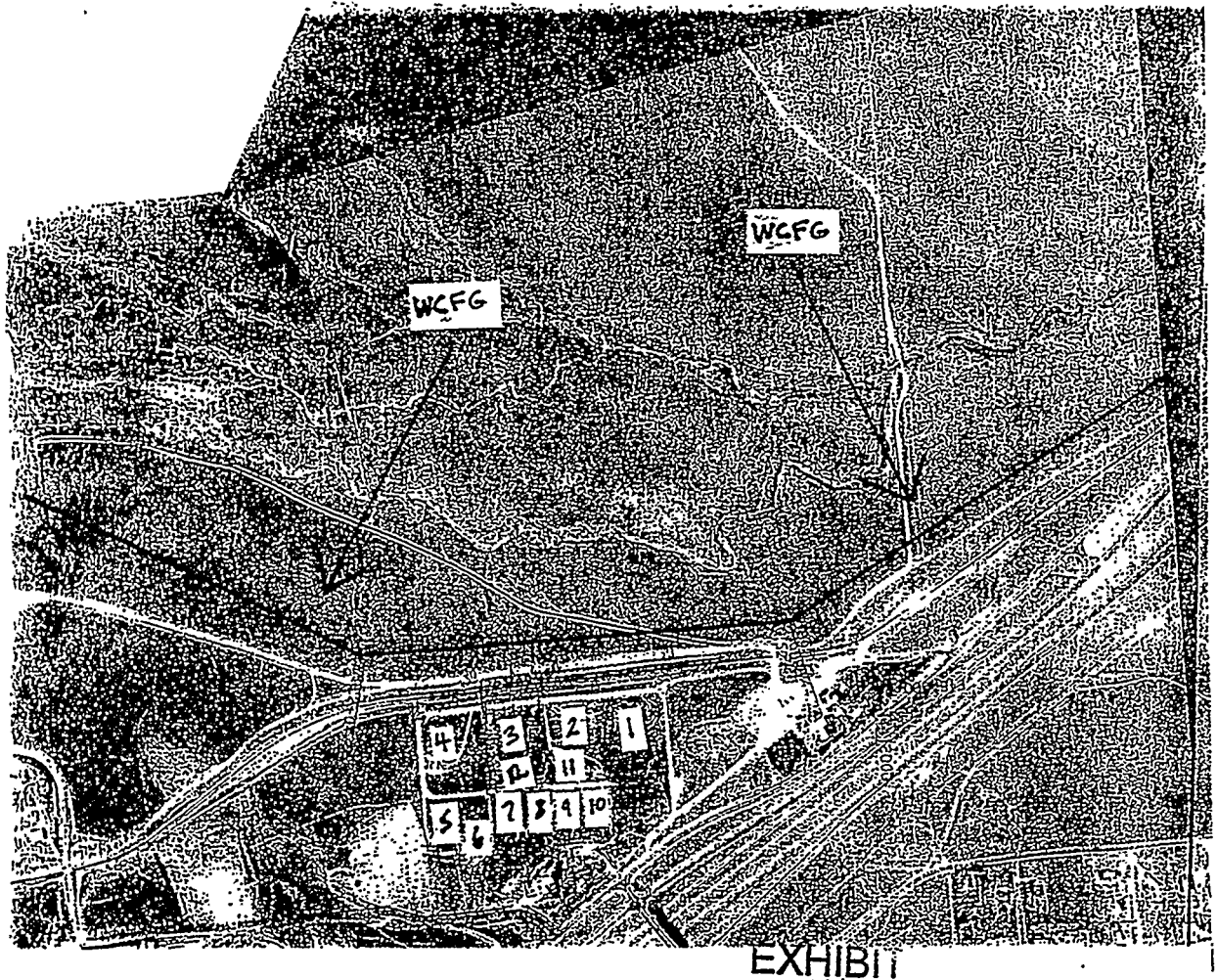
WCFG
WCFG
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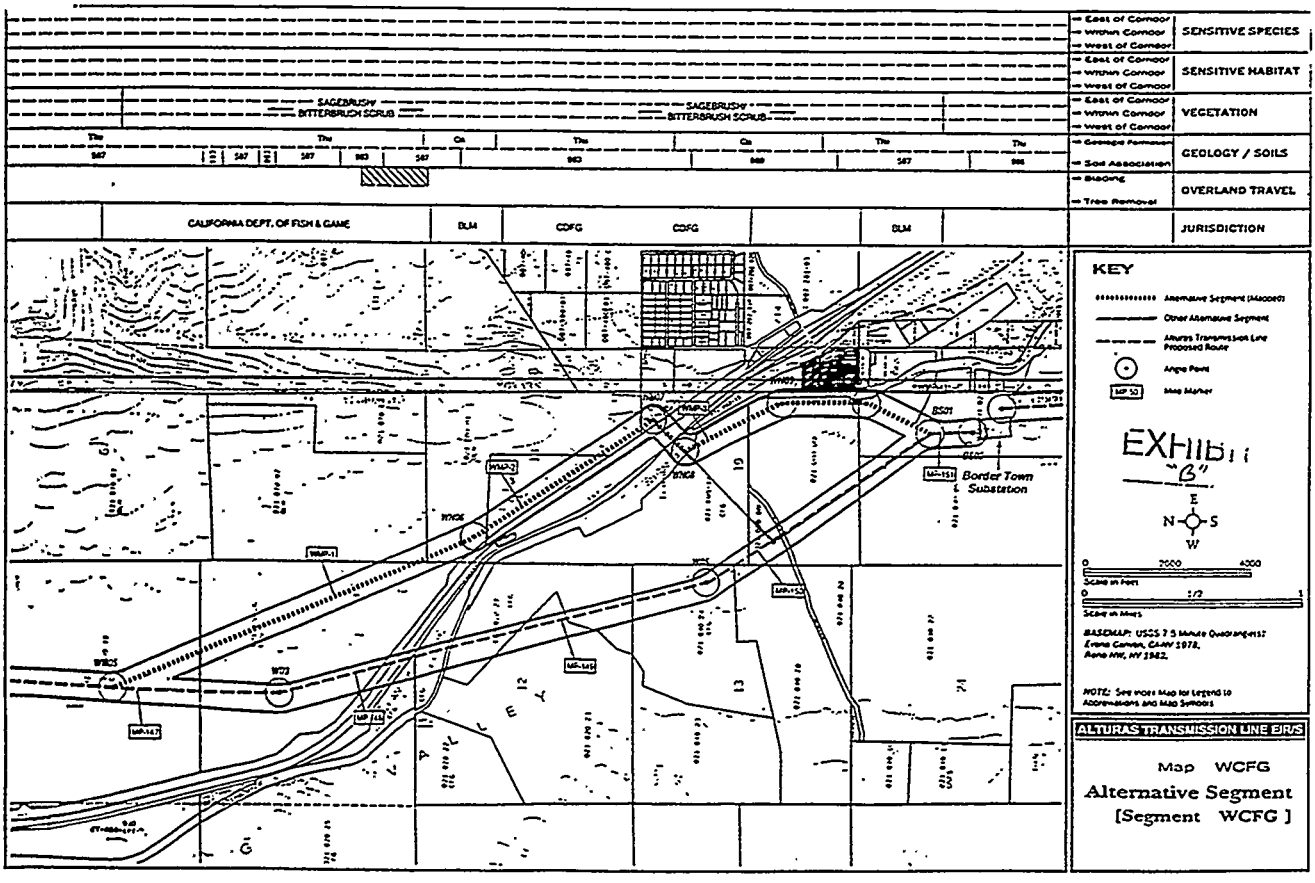
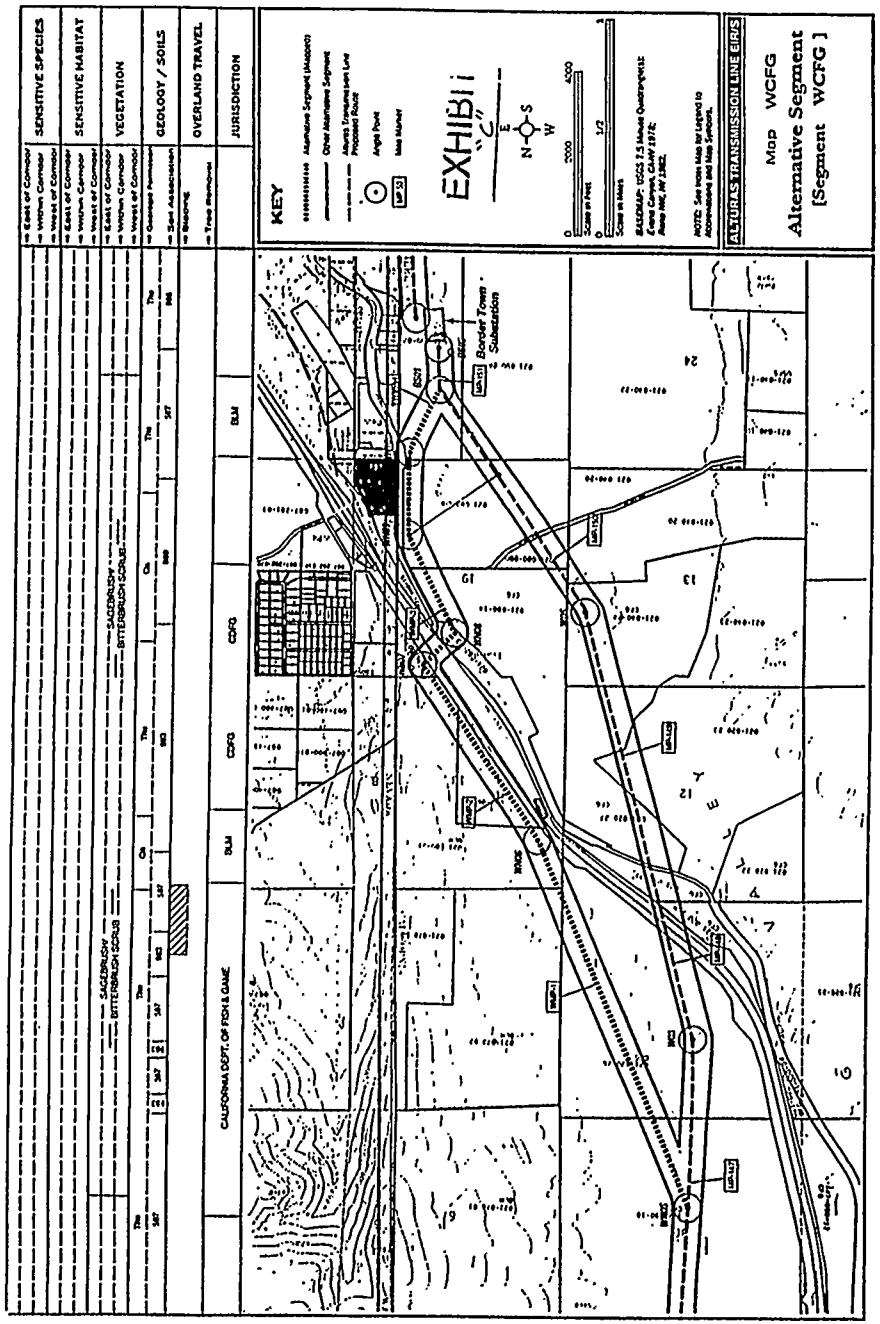
EXHIBIT "A"


East of Corridor
Within Corridor
West of Corridor
SENSITIVE SPECIES
SENSITIVE HABITAT
VEGETATION
SAGEBRUSH
BITTERBRUSH SCRUB
GEOLOGY / SOILS
Soil Association
OVERLAND TRAVEL
Tree Removal
CALIFORNIA DEPT. OF FISH & GAME
BLM
CDFG
JURISDICTION
KEY
Alternative Segment (Alaodes)
Other Alternative Segment
Alturas Transmission Line Proposed Route
Angle Point
Mile Marker
EXHIBIT "B"
Scale in Feet
Scale in Miles
BASEMAP: USGS 7.5 Minute Quadrangles
NOTE: See Index Map for Legend to Abbreviations and Map Symbols
Border Town Substation
ALTURAS TRANSMISSION LINE EIR/S
Map WCFG
Alternative Segment
[Segment WCFG]



Final EIR/S, November 1995

EXHIBIT "D"

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Connie A. VANDYKE (1)

Affiliation: LANDOWNER - SIERRA VIEW RD.

Address: 5 SIERRA VIEW RD.

City: RENO State: NV. ZIP: 89506

Phone: (702) 677-7134 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

As a resident of the Bordertown area, I am outraged that Sierra Pacific Power Company totally disregarded my rights as a landowner. We were also completely "overlooked" by the studies of the E.P.A.! How could we not be noticed during all these studies? We are the most impacted residents along the entire project line.

Not only will our beautiful Valley be seriously scarred, but our land values will suffer tremendously. My home is on a private well. I am told that lines of this magnitude will greatly effect this watertable. Other concerns are that these incredibly high voltage lines will run within 320 feet of Bordertown's large propane tanks as well as within 600 feet of the Coast Gas propane storage plant, both of which are just a few hundred feet of our homes.

Also of concern is health. If the effects on our health is "inconclusive at this time," we are in danger! We were told by SPPCO that many lawsuits had been brought against utility companies across the United States, but none had been won. This was a blatant lie! In 1995, a judge

OC. 32-5

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Connie Van Dyke (2)
Affiliation: landowner
Address: 5 Sierra View Rd.
City: Reno State: NV. ZIP: 89506
Phone: (702) 677-1134 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

in Houston, Texas ruled against Houston Lighting and Power Co, ordering that company to pay 25 million dollars to the plaintiffs. They were also ordered to move the high voltage lines at a cost of 40 million dollars to the utility company.

There are many more concerns that need to be addressed but we have been given only 30 days to voice these concerns and investigate all the true impacts that this substation could have on our lives should it be allowed to be built in our valley.

OC. 32-5

Only a few weeks ago I received legal notification of this project. All other landowners along this project line were notified as much as a year ago!

Another major concern of mine is the fact that BLM land can be traded or sold to powerful companys at the expense of many citizens for the financial gain of its stockholders. BLM land belongs to the public and should be protected for future public use.

Connie Van Dyke

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Edward Anderson
Affiliation: Bordertown Landowner
Address: P.O. Box 60511 25 Sierra View Rd.
City: Reno State: NV ZIP: 89506
Phone: (702) 972-5228 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

OC. 32-6

My first concern is what the health problems may be from the high voltage being so close. There seems to be a real concern that the well water could be contaminated. If so, could it be bad enough to cause health problems.

OC. 32-7

My second concern is property values. We have been told that the value could drop as much as 1/4 and as much as 1/3 and could be hard to sell. I don't think the property owner should have to take the loss.

OC. 32-8

One of the reasons I was interested in my property when I bought it was for the view of the mountains and the valley. The 345KV proposed line would downgrade that view badly.

Edward Anderson

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Kathryn L. Silva - Kathryn L. Silva
Affiliation: Home / Property owner
Address: 20 Sierra View Rd
City: Reno State: NV ZIP: 89506
Phone: (702) 972-5157 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

Health hazard
visual impact
Drop in property values
Failure to notify property owners
possible interference w TV and Radio reception
possible ground water contamination

OC. 32-9

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Edward G. Silva - Edward G. Silva
Affiliation: Home Owner
Address: 20 Sierra View Rd.
City: Reno State: NV ZIP: 89506
Phone: (702) 972-5157 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

Visual Impact
Health Hazard
Drop in property values
Failure to notify property owners.
Possible ground water contamination
Possible satellite interference
Possible radio interference

OC. 32-10

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Cyndee Branham
Affiliation: Bordertown Landowners
Address: 1400 Bordertown Drive
City: Reno State: NV ZIP: 89506
Phone: (702) 677-0953 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

OC. 32-11 1. Due to SPPCO's oversight we were denied participation in the scoping period, public hearings, intervention and our problems weren't addressed in the EIR/S Draft. The later leaving us uninformed on how this project will affect us personally. I would like the opportunity to make comments & additions to the EIR/S when we are finally addressed -- PRIOR TO The FINAL DOCUMENT.

OC. 32-12 2. I didn't feel the alternatives were adequately addressed. Most had the same problems as the purposed route but were dismissed.

OC. 32-13 3. I would like to question the "time frame" this project is said to have. The information we have suggests this project doesn't need to be on-line for several years

OC. 32-14 4. I would like to question the ~~about~~ amount of power that is actually need by SPPCO's service area. Again, the information suggests we only need a fraction of what SPPCO says we need.

OC. 32-15 5. I would like to question the need for the Bordertown Substation. Phase Shifters aren't location specific and the lines are coming in and out at 345 KV. In addition it would be located at least 10-15 miles from the load center.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Cyndee Branham
Affiliation: Bordertown Landowners
Address: 1400 Bordertown Dr.
City: Reno State: NV ZIP: 89506
Phone: (702) 677-0953 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

OC. 32-16 6. I am concern about the health affects on my family ~~healing~~ living within 400' of Center Line. (EMF'S) Inconclusive results after only 15 years of study, but having a rise in childhood leukemia doesn't sound at all comforting when it takes at least 25 years of study for prescription drugs to be safe for the public.

OC. 32-17 7. I would like more information on conductive objects & the affects on small children. For example: how far from Center Line will objects become conducive, what kinds of objects, how much voltage will be conducted and how that will affect a small child -- not a grow man

OC. 32-18 8. I would like more information on how construction & the EMF field will affect the ground water.

OC. 32-19 9. I believe the visual impacts would be severe for this valley and that they were understated in the EIR/S Draft.

OC. 32-20 10. I want more information on mitigation procedures for homeowners affected so severely, to include property values for "view property" but also the sellability of homes so close.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: EDWIN WEST
Affiliation:
Address: 1460 BORDERTOWN, DR.
City: RENO, NV State: NV ZIP: 89506
Phone: (702) 972-8636 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

OC. 32-21

against the altura transmission line for these reasons:
It's too close to our home.
We have a 5-yr old granddaughter who loves to play outside.
There is only one road away from our home.
I have had heart trouble and may need a pacemaker.
It will interfere with our T.V.
It may affect our well water.
It's close to our large propane tank.
We understand it's noisy in damp weather.
We don't like the view.
The line will be close to a large propane distributor.
We believe it's going to affect our property value by around 25%.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: RYAN WEST
Affiliation:
Address: 1460 BORDERTOWN DR.
City: RENO State: NV ZIP: 89506
Phone: (702) 972-8636 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

OC. 32-22

Several reasons I don't want the Alturas Transmission line.
I have a five year old who loves the outside.
It's too close to my home.
There is only one road leaving my home.
It will interfere with my T.V.
It may affect my well water.
It's close to our large propane tank.
I understand it's very noisy in damp weather.
I don't want the terrible view.
The line is going to be close to a large propane distributor.
I understand it will affect my property value.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: BARBARA WEST
Affiliation:
Address: 1460 BORDERTOWN DR.
City: RENO NV. State: NV. ZIP: 89506
Phone: (702) 972 8636 CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

OC. 32-23

Why I don't want the Alturas transmission line.
It's too close to our home.
We have a five year old granddaughter who lives with us permanently, and she loves to play outside.
There is only one road away from our home.
It will interfere with our T.V.
It may affect our well water.
It's close to our large propane tank
We understand its very windy in Lemmi weather.
We don't want the terrible view
The line will be close to a large propane tank
We understand it will affect our property value.

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

Draft EIR/S Comment Sheet

Proposed Alturas Transmission Line

Name: Leo & Janet Wheatley
Affiliation:
Address: 28 Sierra View Rd.
City: Reno State: NV ZIP: 89506
Phone: ( ) CPUC Application No.: 93-11-018 BLM Case No.: CACA-31406

OC. 32-24

We are concerned about:
health problems, short & long term
impact on water source
decrease of property value
providing a corridor for pipelines & other construction
visual impact, loss of serenity & beauty of the valley
noise & interference with TV, radio signals, etc.
impact on recreational use
proximity to a bulk propane plant

Please either deposit this sheet at the sign-in table before you leave today, or fold, seal and mail by May 3, 1995. Insert additional sheets if needed.

RECEIVED JUN 07 1995

May 17, 1995

Org./Citizen Groups
Comment Set 33

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

RE: Alturas Intertie
CPUC #93-11-018
BLM #CACA 31406

Dear Sirs,

The DEIR provided by Aspen Environmental fails to address the cumulative impacts of off site mitigation. Property that would be set aside for a species due to lost habitat resulting from this Project will be changed in it's own way, resulting in a cumulative loss of another type of habitat. You cannot "make up" habitat out of thin air! Lost habitat is lost habitat. Lost habitat in a rural, relatively untouched area is a crime and should not be allowed to happen. I certainly hope the California Department of Fish and Game will not prostitute our resources for their personal gain of department job security and new property. OC: 33-1

Modoc County is the most untouched area of California. Please don't mess it up!

Sincerely,

231 N. Main St.
Alturas, CA. 96101

SPORTS HUT
231 N. MAIN
ALTURAS CA 96101

cc: U.S. Forest Service
U.S. Department of Fish and Game
Bureau of Land Management, Alturas Branch

Org./Citizen Groups Comment Set 34

SAVE LONG VALLEY COALITION
(Non-Profit Organization)

LONG VALLEY IS LOCATED 20 MILES NORTH OF RENO OFF HIGHWAY 395. SIERRA PACIFIC POWER COMPANY, CALIFORNIA PUBLIC UTILITIES COMMISSION, BUREAU OF LAND MANAGEMENT AND CALIFORNIA WILDLIFE FISH AND GAME PLAN TO BRING A 6 ACRE SUBSTATION WITH 345,000 VOLT, 130 FOOT TALL TOWERS TO THIS VALLEY.

THE LINE WILL BE ADJACENT TO SIERRA COUNTY ROAD 570 WHICH IS THE ONLY DIRECT ACCESS FROM THE EAST TO TOIYABE NATIONAL FOREST AND DOG VALLEY.

THIS ACCESS ROAD IS USED BY APPROXIMATELY 35,000 PEOPLE PER YEAR. USUAGE INCLUDES DIRT BIKES, ATV'S, HORSEBACK RIDING, MOUNTAIN BIKE RIDERS, HIKERS, CAMPERS, FISHING, ROCKHOUNDS AND PICNICING.

THE NATURAL INTEGRITY OF THIS VALLEY WILL BE SEVERLY COMPROMISED IF THIS SUBSTATION IS ALLOWED.

WE, THE UNDERSIGNED, OBJECT TO THE BORDERTOWN SUBSTATION AND THE 345,000 VOLT TRANSMISSION LINE IN LONG VALLEY:

OC 34-1

NAME	ADDRESS
Lou Wesner	5515 Kay Drive Windsor CA 95492
Emma Wesner	5515 Kay Kay Dr. Windsor CA 95492
Greg Wesner	" " " " " "
[illegible]	1105 Carol Ln Santa Rosa CA 95404
Maxine Hartwell	1105 Carol Lane Santa Rosa 95404
[illegible]	625 Sawyer Way Sparks NV 89431
Steve Smith	1442 Bubblebee Gulch
[illegible]	4301 Meadowwood Ct CC 89703
[illegible]	2604 Michael Dr.
Claudia [illegible]	4198 King Canyon Rd.
[illegible]	1108 O'Callahan Dr. Sparks NV 89434
D. Eggel	724 Birch St. W.W. Ca. 96137
Jennifer Hutchison	110 Greenwood St WW CA 96137
[illegible]	114 Fir St. WW CA 96137
Irene Wolat	510 Birch St. WW Ca. 96137
Patti Sheehy	125 Fir Westwood CA 96137
Elizabeth L. Myers	3860 Hummingbird Gold Springs NV
Mark Myers	3860 Hummingbird Gold Springs NV
Jerry Langford	49 Bobwhite way Reno, Nev.
Kathy A. Gordon	17210 Waxwing St Reno, Nev
K. Martin	3815 Vacino Ln Reno, Nev
Marilyn Chas	17665 Blackbird Dr Reno NV 89506
Phillip Perry Sonia	6160 Warm Springs Dr. Sun Valley, NV 89433
Kip M. Hirman	2445 Mandan Way, Reno, NV 89506
Gary Feeks	8275 Chippewa Road NV 89506
Jerry Boatz	8140 Seneca Dr. Reno, NV 89504
Michael Gatt	4175 Neil Rd. Apt. C-10 Reno, Nv. 89502
Charles Pannetta	36 Sierra View Rd Bordertown Nv 89506
Jean Westley	15 Sierra View Rd, Reno, NV 89506
W. G. Westley	15 Sierra View Rd. Reno, NV 89506

Becky Masi 18005 Northridge Cold Springs
Kim Martin 3505 Brant St. Reno, NV 89506
R Owen 45 Quaterhorse Cir Reno Nv 89506
Clinton Hibbs 17840 Coldsprings Dr. Reno NV. 89506
Mark Kesner 495 Prairie Dog ct. Cold Springs
James Moore 18990 Mesquite Reno NV 89506
[illegible] 17185 West Opal Ct. Reno, NV 89506
Wayne F. Thomas 3945 Vireo Ct. Reno NV. 89506
[illegible] West 4th St Sun Valley NV 89433
[illegible] 17860 Mockingbird Cold Springs NV 89506
[illegible] 720 F St Sparks, NV 89431
Mike Rollins 17380 Egret Dr Cold Springs NV 89506
[illegible] Potter 1028 Haskell S.F. [illegible] 89507
Marilla Stagaket 3560 Hermisil 89506
[illegible] 3560 Hermisil 89506
Dawn Miller 3420 Brant St Reno NV 89506
[illegible] 3420 Brant St Reno NV 89506
[illegible] 315 Fodrin Way Sparks NV 89431
[illegible] [illegible] Reno NV 89506
[illegible] Murphy 18500 Northridge Ave. Reno NV 89506
[illegible] Walsh [illegible] Reno NV 89506
[illegible] 17745 Peacock Reno NV 89506
[illegible] 3865 Cold Springs Reno 89506
[illegible] 17735 Mockingbird Dr Reno 89506
[illegible] 3975 Sandpiper Dr Reno NV 89506
[illegible] 3975 Sandpiper Dr Reno 89506

Shane Esposito 225 Oregon Blvd Reno NV 89506
Chris Becker 5561 Middle Fork Dr Reno NV 89433
Jay Hoyning 6306 Chelsey Hill Ln Reno NV 89523
Bruce Burke 2243 Centurioright Rd Reno 89511
Colleen Ferguson 2243 Centurioright Rd. Reno 89511
Marilyn Ferguson 30 Mogul Mtn. Circle Reno 89523
[illegible] 50 Bolaus Dr Reno NV 89523
Jim Edwards 13180 Thomas Creek Reno 89511
Richard Howard PO Box 71222 Reno 89570
Dean Kemp 1150 X Cir Sparks
Jarrod Fonte 9937 Porpoise Dr CA 91536
Laurent Ezard 13725 56th Ave S Seattle WA 98168
[illegible] 9195 Freemont Way Reno NV 89506
Rich Frank P.O. Box 50451 Sparks, NV 89435
Terry Hubery 550 Winston Dr. Reno 89512
[illegible] 10506 Cedar Saint Ave Omaha, NE 68134
Don Vergel 7540 Moore Dr Winnemucca Nevada 89445
Debbie Vergel 7540 Moore Dr Winnemucca NV 89445
Dave Gull 760 E Washington St Colton CA 92324
Don Gull 9018 Balboa Bl Northridge, CA 91325
[illegible] 9351 Pollard Rd Fallon NV
[illegible] 02-3240 McGowan Ln Susanville Ca 96130
[illegible] 156 Beckwith St Lemmon Valley NV
Kyle McGlohon 550 Marsh Ave Reno NV 89509
[illegible] 2000 Sagehen W Reno NV 89506
Judie Henderson 1625 Pompe Way Reno 89506

Eileen Fuller 521½ 13th St Sparks NV 89431
[illegible] 521½ 13th St. Sparks NV 89431
[illegible] 3460 Brent St., Reno, Nev 89506
Joel Boudner P.O. Box 124 Sierra City, CA 96125
[illegible] Summell PO Box 1037 Forestville Ca. 95631
Tami Summell 10167 Ranch Rd Auburn, Ca 95602
Brian Summell 10167 Ranch Rd Auburn, Ca 95602
Darlene Coleman P.O. Box 1037 Forestville, CA 95631
Henry Simpson 2315 N. Bellwood Mt. Vista Ca. 95722
Lindy MARTIN 9702 232ND ST E Graham WA 98338
Steve Rowe 33306 177 Pl SE Auburn WA 98092
Claire Rowe 33506 39th Ave SE FEDERAL WAY, WA 98023
[illegible] 3012 NE 111th AVE E Kent WA 98042
Lynne Billin PO BOX 345 Snoqualmie WA 98065
GAIL M. SAXTON 5944 30 THST NW GIG HARBOR WA 98335
Edward Golden 2271 Ethel Dr Rescue, CA 95672
Chris Osuna 5229 Hunter Leigh Pl. Sacramento CA. 95843
Ken Golden 3566 Fur View ct Rescue Ca. 95672
JoAnn Golden 2271 Ethel Dr Rescue CA 95672
[illegible] 7920 Fair Oaks Rd Carmichael, CA 95608
[illegible] Boucher 75 Pinion rd Mark Lewis Hgs CA.
Denise Boucher 146 Hackwood Kirkwood Ca.
Adam Torani 24382 East Bella vista Ca.
ROBERT R. HORTON 2629 N MITRE FRESNO CA.
Doug K. MIGNANO 10129 Harley Leighton Rd. Sp. C-17 Redding, CA. 96003
B. H. SARUS 410 Buckeye Terr Dr Redding CA. 96003
[illegible] McCay 434 50 E St UC NV 89440

EO

COMMENTS FROM ELECTED OFFICIALS

RECEIVED MAY 1 1 1995

Congress of the United States
House of Representatives
Washington, DC 20515

Elected Official Comment Set 1

May 11, 1995

The Honorable Jesse J. Knight, Jr.
Commissioner
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Commissioner Knight:

Last year we wrote to the Commission through Commissioner Shumway to express our strong support for the Alturas Electric Itertie Project being proposed by Sierra Pacific Power Company. At the time, Commissioner Shumway indicated he would keep us informed about the progress on the permitting process for the line. Since Commissioner Shumway has left the CPUC, we want to make it clear that we still support the Project's construction in California.

Our continuing interest in the project is the result of our review of the intertie proposal and the conclusion that it provides significant benefits to northeastern California. In addition to significant tax benefits to the state and local governments along the proposed California route, the line will provide important economic benefits for the region in the form of access to lower cost energy supplies generated in the Northwest and possible access to fiber optic telecommunications services. EO. 1-1

The line will benefit more than 40,000 direct California customers of Sierra Pacific in the region. The intertie also will allow transmission access to more than 9,200 Lassen Municipal Utility District (LMUD) customers, 7,400 Truckee-Donner Public Utility District customers and 5,500 customers of the Plumas-Sierra Rural Electric Cooperative. Without construction of this line, the region would be economically disadvantaged. If the line is constructed using the so-called "Nevada route," both LMUD and Plumas-Sierra will be denied the economic benefits the transmission line will provide.

The Honorable Jesse J. Knight, Jr.
May 11, 1995
Page 2

We will rely on your office to keep us informed of progress on this important project.

Sincerely,

WALLY HERGER
Member of Congress

JOHN DOOLITTLE
Member of Congress

cc: Richard J. Careaga, ALJ, CPUC
Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

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PA

COMMENTS FROM PUBLIC AGENCIES

United States Department of Agriculture

Natural Resources Conservation Service

5301 Longley Lane
Bldg. F, Suite 201
Reno, NV 89511

"Commitment to Quality"

March 8, 1995

Vida Strong
Aspen Environmental Group
30423 Canwood Street
Suite 218
Agoura Hills, CA 91301

Public Agency Comment Set 1

Dear Ms. Strong:

I am sending you this copy of the *Evans Creek Watershed Plan and Environmental Assessment, August, 1994* for consideration in your planning of the electric transmission line from Alturas to Reno.

Specifically, your proposed route appears to be in the vicinity of the pool area for our flood control dam and the site for clay materials which we need for construction of the dam (see map inside back cover of report). This is the only suitable clay material within an economical distance of the damsite. This may or may not be a conflict, but should be considered. PA. 1-1

I hope this information is helpful. I am looking forward to receiving the executive summary and maps of your project. For additional information, please contact me at (702) 784-5863.

Sincerely,

James D. Louthan

JAMES D. LOUTHAN
Program Planning Coordinator

Enclosure

cc: John Capurro, Resource Area Conservationist, NRCS, Reno, NV

The NRCS in Nevada will be the recognized leader in the conservation of natural resources by conforming to customer expectations through quality service, improved communication, and teamwork.

County of Modoc
Road Department and
Public Works Department
202 W. 4th Street
Alturas, California 96101
(916) 233-6403 office
(916) 233-3132 FAX

John G. Pedersen
Road Commissioner/Director
Michael L. Macdonald
Deputy Road Commissioner
Richard R. Hironymous
Deputy Director Public Works
Michael Kip Lybarger
County Surveyor

March 30, 1995

Public Agency Comment Set 2

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

RE: CUPC Application#93-11-018
US BLM Application CACA-31406

Dear Mrs.Halligan and Mr. Humm:

Enclosed is a copy of the Modoc County Road Departments comments made to the Modoc County Planning Department for the Sierra Pacific Power Company Alturas Transmission Line Project.

If you have any questions please call Michael Macdonald at (916) 233-6411.

Sincerely,

Michael L. Macdonald
Deputy Road commissioner

Enclosures

KP MLM:sdm

County of Modoc
Road Department and
Public Works Department
202 W. 4th Street
Alturas, California 96101
(916) 233-6403 office
(916) 233-3132 FAX

John G. Pedersen
Road Commissioner/Director
Michael L. Macdonald
Deputy Road Commissioner
Richard R. Hironymous
Deputy Director Public Works
Michael Kip Lybarger
County Surveyor

March 29, 1995

Modoc County Planning Commission
202 West Fourth Street
Alturas CA 96101

Attention: Scott Kessler

The Modoc County Road Department has completed the review of the draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) on the Alturas Transmission Line Project proposed by Sierra Pacific Power Company.

On the basis of the information provided by the Planning Department the following comments are offered for inclusion.

1. Table C.12-1, Roadways Potentially Affected by Proposed Transmission Line, on page C.12-2 should include County Road # 138 on the list. This road is an extension of Fourth Street in the City of Alturas and begins at the city limits and runs to the end (0.42miles) and accesses the Staging Area. PA. 2-1

2. Section C.12-1, Applicable Regulations, Plans, and Standards, states that it is necessary for the applicant and/or construction contractor to obtain encroachment permits or similar agreements from the agency affected, for roads that will be crossed by the transmission line as well as any parallel roads for which construction activities would occur within or require the use of road right of ways. This procedure is acceptable and shall be accomplished well in advance of the start of construction. Permanent access off County Roads to be used for future maintenance will also require an encroachment permit. PA. 2-2

3. Section C.12.2-1, Definition and Use of Significance Criteria, the eleventh (11th) bullet states "An increase in roadway wear in the vicinity of the construction zone would occur as a result of heavy truck or construction equipment movements, resulting in noticeable pavement or roadway surface deterioration". The potential for this condition to occur is real. Many of the County Roads were not designed to accommodate heavy truck traffic. The condition is listed as a significant impact but is not addressed in the PA. 2-3

Mitigating Measures. Request that Sierra Pacific proposes a method of mitigating this impact. PA. 2-3

4. On page C.12-13, Mitigation Measure T-2, the second sentence states, "Detours including alternate lane routing, shall be coordinated at least 72-hours in advance of construction and shall be approved by the appropriate county sheriff, state highway patrols, and state transportation agencies." Include local transportation agencies (City and County). PA. 2-4

5. The section covering, Increased Traffic Volumes, on page C.12-15 has County Road # 73 listed as the primary access route to the Alturas Substation Devils Garden site. This road has a history of wash boarding under heavy loads, which will require frequent watering and blading. Sierra Pacific will need to mitigate this condition. PA. 2-5

To facilitate appropriate staff scheduling for permitting, a timeline of project milestone events is requested. A final draft EIR/EIS is requested prior to adoption.

If you have any questions regarding the above comments, please call Mike Macdonald at 916-233-6411.

Sincerely,

John G. Pedersen
Public Works Director/ Road Commissioner

cc: Julie Halligan/Peter Humm, CPUC/BLM

JGP.MLM:mlm

-2-

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
P.O. BOX 496073
REDDING, CA 96049 6073
TDD (916) 225 3464
TELEPHONE: (916) 225 3426

IGR/CEQA Review
Alturas 345 KV
Transmission Line EIR/EIS
Mod-299/Las-395-Var
SCH No. 94042001

April 4, 1995

Public Agency Comment Set 3

Ms. Julie Halligan, Alturas Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear Ms. Halligan:

Caltrans District 2 has reviewed the Environmental Impact Report prepared for the Alturas Transmission Line project. From this report it appears that the transmission line will cross Caltrans right-of-way at five locations within our district. One of these locations is in Modoc County on State Route 299, another is in Sierra County on State Route 395, and three locations occur along Route 395 in Lassen County.

PA. 3-1 Caltrans Environmental Office has completed a 2090 informal consultation with the Department of Fish and Game (DF&G) concerning greater sandhill crane nesting adjacent to Route 395 in Lassen County at Post Mile (PM) 125.0. We have agreed to a construction window between PM 124.5 and 125.5. Your crossing (MP 54.8) may be close to where the cranes are nesting. If this is not addressed in the DF&G response to this document, please contact DF&G for the precise location of the nesting area in relation to the proposed transmission lines.

PA. 3-2 Additionally, the Loyalton-Truckee deer herd has a major migration route which crosses State Route 395 in Lassen County below Hallelujah Junction. Caltrans constructed four deer underpasses when the highway was improved to four lanes. The transmission line in that area is approximately one-half to one mile east of the highway. There is no mention in the document text or map exhibits of this migration route. Again, please contact DF&G for further information.

Please be aware that additional environmental information may be required through our encroachment permit process, including copies of other State and Federal agency permits. Other restrictions may apply with regard to acceptable construction methods and traffic control within the State highway right-of-way. We encourage the project proponent to contact the Chief of our Permits Office, Ms. Lynn King, for specific information regarding encroachment permit applications, restrictions, and time frames for permit review. This should assist the applicant in further project planning, and facilitate the expeditious review of the actual permit applications. Ms. King can be reached at 916-225-3314.

Thank you for providing this document for our review. If you have any questions with regard to these comments, please contact me at 916-225-3089.

Sincerely,

Vicki Sue Compton

VICKI SUE COMPTON
Local Development Review Unit
District 2

STATE OF CALIFORNIA - CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY PETE WILSON, *Governor*

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD - LAHONTAN REGION
2092 LAKE TAHOE BOULEVARD
SOUTH LAKE TAHOE, CALIFORNIA 96150
(916) 542-5400 FAX (916) 544-2271

April 13, 1995

Public Agency Comment Set 4

Julie Halligan
California Public Utilities Commission
c/o Aspen Environmental Group
30423 Canwood Street, suite 218
Agoura Hills, CA 96118

Dear Ms. Halligan:

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT FOR THE ALTURAS TRANSMISSION LINE PROJECT, LASSEN COUNTY, CPUC APPLICATION NO. 93-11-018, BLM APPLICATION NO. CACA-31406, SCH# 94042001

The Lahontan Regional Water Quality Control Board (Regional Board) has received a request for comments on the draft environmental impact report/statement (DEIR) for the above referenced project. Thank you for giving us this opportunity to comment on the project proposal.

The Regional Board is a responsible agency under the California Environmental Quality Act. The Regional Board will consider issuing a National Pollution Discharge Elimination System (NPDES) Individual Stormwater Permit for Construction Activities and a waiver of certification under Section 401 of the Clean Water Act.

Project Description

We understand that the project consists of constructing an overhead electric power transmission line from Alturas, California to Reno, Nevada. The proposed transmission line route is approximately 164 miles long. Approximately 100 miles of the transmission line is proposed to be constructed in the Lahontan Region, all of which is located in Lassen and Sierra Counties. The transmission line basically parallels Highway 395 from the Modoc/Lassen County border south to east of Herlong. From this point, the transmission line enters Nevada and then re-enters California southeast of Doyle. The transmission line then follows Highway 395 south and re-enters Nevada near Bordertown. The proposed transmission line will be suspended from 70- to 130-foot structures spaced about every 1,200 feet. Approximately 730 structures will be required. The proposed project will require construction of two new substations in California, one northwest of Alturas and one in Sierra County. The proposed project spans several perennial streams and many intermittent watercourses in the Lahontan Region. Numerous wetlands are associated with the streams and watercourses.

Water Quality Concerns

Potential environmental impacts on water quality due to building and operating the project include soil erosion, loss of native vegetation, increased surface runoff due to impermeable or compacted surfaces, access roads, alteration of existing watercourses, wetlands and ground water, and the discharge of petroleum products and other chemicals to surface or ground waters. Regional Board staff have the following concerns about potential impacts on water quality from the proposed project.

Watercourse and Drainage Protection

1. Subsection C.7.2.2.1, *Impacts on Surface Water*, refers to crossing wetlands along project segments A, L, W, and X. However, a recent wetlands delineation for the Tuscarora pipeline indicates that there are several jurisdictional wetlands in the project right of way which do not correspond to the above-referenced segments. Considering this inconsistency and the potential for significant impact to environmentally sensitive areas, we feel that this document is incomplete without a comprehensive wetlands delineation based on the legal definition of this term (33 CFR 328.3) and the Army Corps of Engineers' 1987 Wetland Delineation Manual. The Final Environmental Impact Report (FEIR) should include a disclosure on the amount of disturbance to waters of the State and a wetlands restoration plan for those wetland areas which cannot be avoided. PA. 4-1

2. Page C.7-3 states that the project crosses seven designated 100-year floodplains. Six of the seven designated 100-year floodplains are within the Lahontan region. An alteration of floodplain topography or vegetative cover warrants consideration because of possible indirect impacts including removal of special aquatic habitats and stream erosion. Mitigation measure G-11 must be applied to disturbance in the designated 100-year floodplains with respect to restoration of topography and vegetation to pre-construction conditions. PA. 4-2

3. Page C.7-8 states that a General Construction Activity Storm Water Permit would be required from the California Regional Water Quality Control Board (Regional Board) under National Pollution Discharge Elimination System (NPDES) regulations. The State Water Resources Control Board is responsible for the administration of the General Construction Activity Storm Water Permit under NPDES regulations. However, it may be necessary for the Regional Board to issue an individual NPDES depending on the extent of disturbance in wetlands. In either case, the Regional Board will be responsible for reviewing the Storm Water Pollution Prevention Plan. PA. 4-3

4. Page C.7-16 refers to cumulative impacts with respect to the Tuscarora Pipeline. However, no mention is made of the effect of construction activities on newly restored areas where the right of way for the two projects coincide. This comment applies to both wetland and staging area restoration. The FEIR should address any agreements which have been made with the Tuscarora Corporation with respect to mutual success criteria for restoration efforts. PA. 4-4

Alturas DEIR/EIS comments - 3 -

Monitoring

The DEIR does not state how often restored areas will be inspected/evaluated or what success criteria will be used. Success of restoration should be evaluated at least once in the spring and once in the fall until pre-construction conditions are met. A discussion of performance goals and success criteria (such as vegetative coverage) for restoration efforts and the measures to be taken if goals are not met should be addressed in the FEIR. PA: 4-5

Thank you again for allowing Regional Board staff to review the proposed Alturas Transmission Line project. Staff is looking forward to working with Sierra Pacific Power Company representatives to properly permit the project. Please send a written copy of the agency's Notice of Determination to Lahontan Regional Board, 2092 Lake Tahoe Blvd., South Lake Tahoe, CA 96150, Attention John L. Short. If you have any questions regarding these comments or the permitting process, please contact me at (916) 542-5436 or Chris Adair, Water Resource Control Engineer at (916) 542-5433.

Sincerely,

John Short

John Short, P.E.
Chief, Regulation and Enforcement Unit

cc: Regional Board Members
Robert Sorvaag, Lassen County Planning
Sierra County Planning
Bill Campbell, Division of Water Quality, State Water Resources Control Board
George Day, Central Valley Regional Water Quality Control Board, Redding
Bob Junnell, Army Corps of Engineers, Sacramento
California Department of Fish and Game, Redding
Frank Hall and Paul Chapell, California Department of Fish and Game, Wendel
Office of the Secretary, Federal Energy Regulatory Commission
Michael Chiriatti, State Clearinghouse

CWA/dm20/alturas.eir

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
555 Capitol Mall, Suite 235, Sacramento, CA 95814 (916) 445-3846

CUSTOMER SERVICE SURVEY

Our goal is to provide the public with the best possible service. Recognizing that sometimes we succeed and at times we will fall short, we want to know how well you feel we are doing. Please take a few minutes to answer the questions below, fold the sheet as indicated, and send your comments directly to me. Your comments will help us serve you and others better. Thank you.
— James M. Strock, Secretary for Environmental Protection

Which office did you contact?

- ☐ Office of the Cal/EPA Secretary (Sacramento)
- ☐ Air Resources Board
  - ☐ Headquarters (Sacramento)
  - ☐ El Monte Laboratory
- ☐ Department of Toxic Substances Control
  - ☐ Headquarters (Sacramento)
  - ☐ Berkeley, Region 2 Office
  - ☐ Clovis Satellite Office
  - ☐ Glendale, Region 3 Office
  - ☐ Long Beach, Region 4 Office
  - ☐ Sacramento, Region 1 Office
- ☐ Department of Pesticide Regulation
  - ☐ Headquarters (Sacramento)
  - ☐ Anaheim District Office
  - ☐ Berkeley District Office
  - ☐ Fresno District Office
  - ☐ Sacramento District Office
- ☐ Integrated Waste Management Board
  - ☐ Headquarters (Sacramento)
  - ☐ Fullerton
  - ☐ Redlands
  - ☐ Valencia
- ☐ Office of Environmental Health Hazard Assessment
  - ☐ Headquarters (Sacramento)
  - ☐ Berkeley
- ☐ State Water Resources Control Board (Sacramento)
- ☐ Regional Water Quality Control Board
  - ☐ Fresno
  - ☐ Los Angeles
  - ☐ Oakland
  - ☐ Palm Desert
  - ☐ Redding
  - ☐ Riverside
  - ☐ Sacramento
  - ☐ San Diego
  - ☐ San Luis Obispo
  - ☐ Santa Rosa
  - ☐ South Lake Tahoe
  - ☐ Victorville

	No Opinion	Strongly Agree	Agree	Disagree	Strongly Disagree
Staff was courteous.					
Staff was professional.					
Staff was knowledgeable.					
Your questions were clearly answered.					
You were helped in a timely manner.					
You were referred to the correct party for further information.					
Complete information was provided.					

Are there any staff persons you would like to commend? _____

Do you have any comments or suggestions on how we can improve our service to the public:

If you would like to speak to a manager directly, please provide your name, organization, and telephone number:

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SIERRA COUNTY

Department of Planning and Building Inspection
P.O. Box 530
Downieville, California 95936
916-289-3251
Fax 916-289-3620

Tim H. Beals
Director

April 19, 1995

Public Agency Comment Set 5

Ms. Julie Halligan
California Public Utility Commission
505 Van Ness Avenue, Area 3-B
San Francisco, CA 94102

Dear Ms. Halligan:

Enclosed is a certified copy of Sierra County Resolution No. 95-081, Directions For Formal Comment on Proposed Alturas Intertie EIR/EIS. Please note Section 5 on Page 2 which requests a 30-day extension from the California Public Utilities Commission within which to submit the County's formal written comments on the draft EIR/EIS. Please respond as soon as possible if this extension is approved or not.

Thank you.

Sincerely,

SIERRA COUNTY
PLANNING DEPARTMENT

Tim H. Beals

Tim H. Beals
Director

THB:jc:4/16

RECEIVED APR 19 1995

BOARD OF SUPERVISORS, COUNTY OF SIERRA, STATE OF CALIFORNIA

DIRECTIONS FOR FORMAL)
COMMENT ON PROPOSED)
ALTURAS INTERTIE EIR/EIS) RESOLUTION NO. 95-081

FACTUAL BACKGROUND

A. Pursuant to public notice on March 28, 1995, the Sierra County Board of Supervisors met in joint session with the Sierra County Planning Commission for the purpose of conducting a public hearing on the Alturas Intertie Environmental Impact Report/Environmental Impact Statement ("EIR/EIS").

B. Based upon public testimony and documents received for the record, the Board of Supervisors makes the following Preliminary Findings:

1. There is a demonstrated need for additional electrical power for the region anticipated to be served by the proposed Alturas Intertie and, consequently, the Board does not oppose the Alturas Intertie project.

2. There is strong public opposition to the portion of the proposed power line route through Long Valley in Sierra County and the proposed location of the "Bordertown" Substation, also in Sierra County.

3. The EIR/EIS fails to assess alternatives to the location of the proposed substation. PA. 5-1

4. The EIR/EIS fails to adequately evaluate alternatives to the transmission route. PA. 5-2

5. The EIR/EIS is defective because it fails to evaluate and provide a rational basis for non-selection of several environmentally beneficial alternative routes other than through Long Valley including: PA. 5-3

   a. A route within an existing transmission corridor within the state of Nevada ("the Nevada Alternative")
   b. A route east of the Peterson Range.

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

1. The County of Sierra does not object to the overall Alturas Intertie goals of providing more reliable and economically beneficial sources of power.

1

Resolution No. 95-081

2. The County of Sierra opposes that portion of the proposed transmission route through Long Valley (west of the Peterson Range in the Highway 395 corridor) and objects to the failure of the EIR/EIS to analysis alternative routes and to provide a rational basis for not selecting less environmentally sensitive alternative routes. (PA. 5-4)

3. The County of Sierra opposes the present siting of the proposed Bordertown transmission substation and objects to the failure of the EIR/EIS to identify any alternatives to the proposed "Bordertown substation"; does not define the substation; nor does the document identify cumulative and/or growth-inducing impacts potentially resulting from the construction of the substation. (PA. 5-5)

4. The Board of Supervisors directs preparation of formal comments to the Draft EIR/EIS.

5. The Sierra County Board of Supervisors hereby requests a 30-day extension from the California Public Utilities Commission within which to submit the County's formal written comments on the draft EIR/EIS (through June 2, 1995).

ADOPTED by the Board of Supervisors of the County of Sierra on the 4th day of April, 1995, by the following vote:

AYES: Supervisors McIntosh, Luchessi, Bowling, Whitley
NOES: Supervisor McCaffrey
ABSTAIN: None
ABSENT: None

COUNTY OF SIERRA

J. McCaffrey

JEROME MC CAFFREY
CHAIRMAN, BOARD OF SUPERVISORS

ATTEST:

Mary J. Jungi

MARY J. JUNGI
CLERK OF THE BOARD

APPROVED AS TO FORM:

WILLIAM W. PANGMAN
COUNTY COUNSEL

THE FOREGOING INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE. APR 18 1995
ATTEST: Mary J. Jungi
COUNTY CLERK AND EX-OFFICIO CLERK OF THE BOARD OF SUPERVISORS IN AND FOR SIERRA CO., CALIFORNIA
BY DEPUTY

L148SC26.RES 44951141

2

BOARD OF SUPERVISORS, COUNTY OF SIERRA, STATE OF CALIFORNIA

IN THE MATTER OF)
THE ALTURAS INTERTIE)
PROPOSED PROJECT)

RESOLUTION 95-026

WHEREAS, Sierra Pacific Power Company submitted to the California Public Utilities Commission a document entitled Alturas 345 KV Transmission Line Project - Proponents Environmental Assessment - October 1993; and

WHEREAS, this submittal, in part, became the basis for the California PUC Scope of EIR/EIS in it's evaluation of impacts associated with the proposed transmission line project; and

WHEREAS, the preferred route as contained in the "Proponents Environmental Assessment" is in Long Valley, Sierra County which is an environmentally sensitive, scenic area of Sierra County with an established residential area; and

WHEREAS, there exists an existing transmission line and/or corridor further east of Long Valley and within the State of Nevada that is the most likely, environmentally appropriate location for this proposed 345 KV line.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF SIERRA resolves and declares that the current, preferred location of the proposed electric transmission corridor/line as represented in Sierra Pacific Power Company's document entitled "Alturas 345 KV Transmission Line Project-Proponents Environmental Assessment" is strongly opposed and the State of California, Public Utility Commission is strongly urged to evaluate alternative routes, especially an alignment which is a current and approved transmission corridor which is predominantly within the State of Nevada and outside of Long Valley, Sierra County, California. (PA. 5-6)

ADOPTED by the Board of Supervisors of the County of Sierra on the 7th day of February, 1995 by the following vote:

AYES: Supervisors McIntosh, Luchessi, McCaffrey, Bowling, Whitley
NOES: None
ABSTAIN: None
ABSENT: None

J. McCaffrey

JEROME MC CAFFREY, CHAIRMAN
BOARD OF SUPERVISORS

ATTEST:

Mary J. Jungi

MARY J. JUNGI
CLERK TO THE BOARD

APPROVED AS TO FORM:

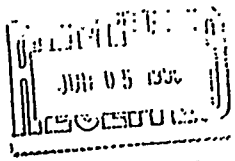
WILLIAM W. PANGMAN
COUNTY COUNSEL

THE FOREGOING INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE. MAR 31 1995
ATTEST: Mary J. Jungi
COUNTY CLERK AND EX-OFFICIO CLERK OF THE BOARD OF SUPERVISORS IN AND FOR SIERRA CO., CALIFORNIA
BY

C:\WP51\DATA\FORMS\ALTURAS.RES

SIERRA COUNTY

Department of Planning and Building Inspection
P.O. Box 530
Downieville, California 95936
916-289-3251
Fax 916-289-3620



Tim H. Beals
Director

June 1, 1995

ASPEN Environmental Group
30423 Canwood Street
Suite 218
Agoura Hills, CA 91301

Attn: Ms. Julie Halligan-CPUC
Mr. Peter Humm-BLM

RE: CPUC Application 93-11-018
BLM Application CACA-31406

Dear Ms. Halligan and Mr. Humm:

The Sierra County Board of Supervisors offers the following comments regarding the Sierra Pacific Power Company Alturas Transmission Line Project-Draft Environmental Impact Report/Environmental Impact Statement dated March 1995 (hereinafter referred to as "DEIR/EIS").

Sierra Pacific Power Company is proposing to construct and operate a 164 mile long, 345kv electric power transmission line from Alturas to Reno. The components of the proposed project which directly affect Sierra County include a segment of the transmission line corridor and a substation, both of which are proposed to be located in Long Valley, Sierra County.

The Sierra County Board of Supervisors opposes the Alturas Transmission Project to the extent that the project proposes to locate facilities within Long Valley in eastern Sierra County. This position is confirmed in Board of Supervisors Resolution 95-128 adopted May 16, 1995. The Board feels strongly that alternative transmission line and substation locations exist that would maintain the overall project as feasible while eliminating significant adverse impacts to Sierra County.

Sierra County is a sparsely populated rural California County which proudly protects its resource industries including agriculture, recreation, mineral extraction, and timber. The County has a very effective land use program which has been in place since 1970 and very specific land use and community plans have been adopted which have established community goals and future land use patterns. The proposed Alturas Transmission project is inconsistent with the County General Plan, zoning regulations, and the community goals and objectives stated for the Long Valley portion of Sierra County.

The County is in the process of updating its general plan and during the course of this process, the County received a specific request from Sierra Pacific Power Company to amend its general plan to allow a substation designation to be applied to property in Long Valley (see exhibit one attached hereto). This request was rejected by the County for numerous reasons which will be described in the following paragraphs and which are the foundation for the County's opposition to the proposed Alturas Transmission project.

The Long Valley portion of Sierra County is an extremely unique region offering very pristine conditions, open space and pastoral views in the agricultural valley nestled between the Sierra range to the west and the Pederson Range to the east. There exists a striking resemblance between Long Valley and the northern portions of Owens Valley located in the southern Sierra region. There also exists a true concern that Long Valley will become to Sierra Pacific Power Company what Owens Valley has become to the Los Angeles Department of Water and Power. Sierra County has maintained a consistent land use plan for Long Valley, encouraging agricultural and open space uses as well as recreational uses. The County and the State of California maintain a long-standing relationship which has resulted in the State acquisition of wildlife management areas in Long Valley for the protection of wetlands, deer migration corridors, and critical meadow-fawning areas in the valley floor. The visual impacts, growth inducement, and cumulative effects resulting from the proposed Alturas Transmission project will be significant and the DEIR/EIS fails to evaluate these impacts.

The Sierra County Board of Supervisors has taken four (4) actions related to this project. These actions were the result of many public meeting-discussions which occurred before the County Planning Commission and the Board of Supervisors where project impacts were discussed and possible mitigation was suggested. Representatives of Sierra Pacific Power Company were present for most if not all of these meetings and unfortunately the company did nothing to effectuate a change in the project to accommodate the County concerns. The Company asserted it was powerless to do so in light of the fact that the DEIR/EIS process was underway and not under the Company's control. The County actions were as follows:

1) County Resolution 95-026 adopted February 7, 1995 (attached hereto as exhibit two) opposes the Long Valley segment of the proposed Alturas Transmission project.

2) County Resolution 95-081 adopted April 4, 1995 (attached hereto as exhibit three) opposes the proposed transmission corridor

Ms Halligan, Mr. Humm
June 1, 1995
Page Three

and substation site in Long Valley and further identifies that there exists a failure to adequately identify and analyze alternatives which would lessen environmental effects. The position further expresses concern over growth inducement and cumulative issues.

3) County Resolution 95-128 adopted May 16, 1995 (attached hereto as exhibit four) which opposes the proposed Alturas Transmission project as such project proposes facilities within the Long Valley area.

4) County Resolution 95-133 adopted May 31, 1995 which authorizes and approves the filing of comments on the DEIR/EIS consistent with prior resolutions of the Board of Supervisors.

County Resolutions 95-026 and 95-081 were entered into the CPUC/BLM hearing record created during the April 19, 1995 public hearing held in Loyalton. These two resolutions as well as Resolution 95- were discussed before the administrative law Judge during the hearings conducted in Susanville, California in the matter of Sierra Pacific Power Company's application for a certificate of public convenience and necessity (CPUC Application 93-11-018).

The Board of Supervisors in its review of the DEIR/EIS finds that there exist key areas of the document which are inadequate, lacking in information and analysis, and containing flaws which do not adequately identify impacts resulting from the proposed project. These key areas include:

1) The proposed project is inconsistent with the County General Plan and zoning ordinances. The General Forest and Agricultural designations applicable to the Long Valley area are not compatible for transmission corridors. Further, the site of the substation which was the specific request of Sierra Pacific Power Company to be designated an alternative land use was found to be incompatible with the General Plan and was rejected. The document fails to recognize the County land use plans, their respective designations, and relative issues of compatibility with the proposed project. PA. 5-7

2) The proposed project will significantly affect the land use goals of the County relative to Long Valley. The existing mix of agricultural uses, wildlife management uses, large lot residential uses, and the existence of proposed, major recreational opportunities have not been adequately evaluated and the resultant impacts to these uses from the proposed Alturas project are not adequately stated. The visual and aesthetic impacts alone are significant and adverse. PA. 5-8

Ms. Halligan, Mr. Humm
June 1, 1995
Page Four

3) The alternatives in the DEIR/EIS regarding transmission are only minor variations of the same route or alternative. This level of alternative review does not satisfy the NEPA and CEQA obligation to consider a full range of feasible alternatives.

For example, there exists a "Nevada Alternative" which would occupy an existing transmission corridor located within the State of Nevada; would eliminate the Long Valley transmission segment; and which has superior qualities (less environmentally sensitive, existing corridor, etc). The "Nevada Alternative" is even recommended by the State Department of Fish and Game (see letter dated August 29, 1994 attached hereto as exhibit 5). On page B-83 and 84 of the DEIR/EIS it is mentioned that the 230 mile "Nevada Route" may have the potential environmental advantages of passing through areas that may be less sensitive than that of the proposed Long Valley route. A stated negative to the "Nevada Alternative" is the fact that the route is subject to existing land use constraints within the City of Sparks and the City of Reno. Why then can one alternative be discounted due to land use constraints in Nevada (which are highly questionable) and then the very same land use constraints identified in Long Valley and administered by Sierra County are ignored or discounted? On Page C14-4 a few more tenuous arguments are put forth against the "Nevada Alternative" yet there is no supporting data. This puts under question the validity of discounting this alternative. PA. 5-9

All comments directed towards the several alternative routes are subject to question based on the paragraphs found on Page D-13 of the DEIR/EIS. It states in part "This evaluation was conducted to provide information on the possible options available to SPPCo in the event that the "no" project alternative is deemed preferable. Since these alternatives have only been preliminary studies by SPPCo, no site-specific information is available. Therefore, the evaluation of these alternatives in section C-14 is limited to qualitative assessment."

Finally, the quality of the discussion of alternatives in the DEIR/EIS can best be described by referring to the prepared direct testimony of Mr. Roger Olack, Project Manager for the Alturas Intertie Project for Sierra Pacific Power Company. The direct testimony is that which was offered before the CPUC in the hearings to determine public need and convenience for the proposed Alturas Project. Portions of Mr. Olack's direct testimony are attached hereto as exhibit six. It indicates that a study commissioned by SPPCo by RMI Consultants to produce constraints and a siting study for inclusion in the applicants PEA (Preliminary Environmental Assessment which ultimately was used by CPUC as an initial study) PA. 5-10

Ms. Halligan, Mr. Humm
June 1, 1995
Page Five

and which addresses powerline siting was "based entirely upon existing information"(Page 1 of Olack direct testimony lines 37-45). Further, Olack's direct testimony on Page 2, lines 42-45 and Page 3, lines 1-8 attached hereto as exhibit 7 qualify the development of alternatives. The direct testimony states " Sierra's preferred alternative and the seven other alternatives were designated in the PEA to satisfy a portion of the permitting requirements of the CPUC. The PEA was not intended to portray all of the comprehensive studies required for compliance with NEPA and CEQA". Therefore, how can the CPUC rely on the PEA as an initial study and thus allow it to become the basis for the discussion of alternatives in the DEIR/EIS when by Sierra's own admission it is clear that the study or analysis of alternatives was severely limited to existing information and was only submitted to satisfy CPUC application requirements. The discussion of transmission alternatives is very weak; directed only at minor variations of the preferred route; and offers no basis for not considering other feasible routes, outside of Long Valley as is best represented by the discounting of the "Nevada Alternative". PA. 5-10

4) The DEIR/EIS on pages A-28 offers a viable alternative to satisfy the primary goal of the project-that being reliability enhancement. The identified alternative would be construction or upgrading of additional transmission lines. The DEIR/EIS states " A 120 KV line from east Tracy Substation to Silver Lake Substation would alleviate overload contingency and cost 9 million dollars. A 345 KV line from East Tracy to Silver Lake would also solve the problem for 24 million dollars. These lines would also satisfy the need for additional service into North Valley. However these transmission facility additions would not increase the import capacity of the SPPCo system, nor would they provide additional access to the Pacific Northwest power market." Sierra County and Long Valley should not be required to accept the preferred project in Long Valley and accept its associated significant, environmental impacts simply because SPPCo wishes to improve its economic well-being by discounting or avoiding consideration of more feasible alternatives. PA. 5-11

5) The DEIR/EIS on Page C 14-3 presents an additional alternative involving Tracy-Silver Lake and collectively with Midpoint-Carlin-Valmy/Burns-Oreana alternatives.On Page C 14-4 additional statements are offered which satisfy primary project objectives. Then on page C 14-10 extremely vague and weak arguments are offered to discount and eliminate another very feasible alternative from being considered which would avoid the Long Valley area of Sierra County.The CPUC and BLM should not accept this argument and should cause a complete re-evaluation of these transmission alternatives. PA. 5-12

Ms. Halligan, Mr. Humm
June 1, 1995
Page Six

6) The DEIR/EIS offers no alternatives to the Bordertown substation site in Long Valley. The proposed Hilltop substation analyzed four alternatives yet no alternative sites were even considered for the Bordertown substation. It is important to understand that SPPCo acquired a 176 acre parcel in 1990 (three years prior to filing the PEA and application for Public Convenience and Necessity) and when it was discovered in 1994 that the parcel was part of a residential subdivision containing strict Covenants, Conditions, and Restrictions (recorded in Sierra County) the applicant quickly initiated negotiations with BLM to consider a contiguous parcel to the North. This BLM parcel is now the preferred Bordertown substation site. The appearance as well as the complete lack of alternatives to the Bordertown substation indicates that the entire project may have been designed around constructing the Bordertown substation and bringing transmission corridors into this site. This could explain the resistance to considering any other transmission or substation alternative by SPPCo. However, the CPUC and BLM as co-lead agencies under CEQA and NEPA, respectively must consider a full range of feasible alternatives to the project. Where, then is the full range of feasible alternatives to the Bordertown substation? Where is the alternative that suggests no substation at Long Valley? Where is the alternative to expand the existing North Valley substation to serve in place of the Bordertown substation? PA. 5-13

7. Further concern exists with the DEIR/EIS over potential cumulative impacts and growth inducement when one separates the two, key project goals: 1) reliability enhancement; and, 2) expanding import and export capability. Service reliability enhancement may be gained with less expensive and less environmentally sensitive alternatives. California users only represent 8% of the SPPCo system. The proposed project appears to be more of a project to import/export, which presents significant cumulative effects and potential growth inducing impacts. This is evidenced by the potential of linking onto the proposed Alturas Project by LMUD in Lassen County and Plumas Sierra Rural Electric Cooperative. Further potential is evidenced by exhibits 8 and 9 attached hereto which confirms the discussions between SPPCo and TANC (Transmission Agency of Northern California) regarding connections and a possible trans-Sierra Corridor. These contacts and possible others when combined with the intent of SPPCo to access Pacific Northwest power supplies indicate clear cumulative PA. 5-14

Ms. Halligan, Mr. Humm
June 1, 1995
Page Seven

impacts through future wheeling of power and access to the marketplace.

This failure to account for the logical expansion of the project in the DEIR/EIS is a strong weakness and it is the County's position that the project is not adequately or accurately portrayed. The Alturas Project will be the springboard to a larger project which has the potential for an expanded use or uses. The proposed project will become a magnet for future links or powerlines and thus there exists a cumulative effect which is required to be considered. PA. 5-14

8) The discussion in the DEIR/EIS on alternatives needs significant re-evaluation and analysis. While specific references have been outlined above, it is the County's position that there is no credible analysis of the Nevada Transmission Alternative or the Bordertown substation. Section 15126 of the CEQA guidelines clearly specifies that there exists a two-pronged analysis regarding alternatives and the relative focus of alternatives is to identify and analyze alternatives which meet the basic objectives of the proposed project and which avoid environmental impacts of the project. This means, for this proposed project, that the DEIR/EIS is not adequate in its assessment and identification of alternatives in that there exists no thorough and/or equal weight analysis of alignments and substation alternatives. Further, it is the County's position that feasible alternatives exist that both meet the objectives of the project and avoid the significant environmental impacts identified if the project were to occur as proposed in Long Valley, Sierra County. PA. 5-15

In summary, the Board of Supervisors appreciates the opportunity to participate in the review of the DEIR/EIS and further appreciates the time extension granted by CPUC and BLM. The County of Sierra continues to offer its desire to meet with representatives of SPPCo, CPUC and BLM to attempt to resolve many, if not all, of the identified concerns outlined in this letter. While the County understands and supports the need for greater service reliability within the SPPCo service area, it cannot support the significant environmental impacts and land use incompatibilities which will result from the proposed project if such is located within Long Valley, Sierra County.

Ms. Halligan, Mr. Humm
June 1, 1995
Page Eight

Thank you and if you have further questions please do not hesitate to contact me.

Sincerely,

SIERRA COUNTY
PLANNING DEPARTMENT

Tim H. Beals
Planning Director

THB:jc:6/8

Sierra Pacific Power Company
Your Energy People

November 15, 1993

RECEIVED
NOV 15 1993
SIERRA COUNTY PLANNING DEPT

Sierra County Planning Commission
Mike Miller, Chairman
c/o Sierra County Planning Department
Post Office Box 530
Downieville, CA 95936

Dear Mr. Miller:

Re: Draft Sierra County General Plan

Sierra Pacific Power Company (Sierra Pacific) hereby formally submits written comments regarding the Draft Sierra County General Plan. It is our understanding that the public comment period runs through November 15, 1993. Sierra Pacific requests that our comments be addressed at this draft stage. These comments provide new information and address our concerns with Sierra Counties goals, policies and implementation measures in some of the elements of the draft plan.

The following are Sierra Pacific's comments, issues and concerns:

A) Section 4. Circulation Element

- On page 4-33 "Pipelines and Transmission Lines", the second paragraph states that Sierra Pacific and the Sacramento Municipal Utility District (SMUD) "...are constructing a 345kV electric transmission line intertie between their respective operating areas..." This paragraph needs to be modified to reflect that the project was studied but never constructed. Sierra Pacific's Electric Resource Plan filed with the Public Service Commission of Nevada (PSCN) on July 1, 1992, does not include this project in our "preferred plan" to meet our customer's need through 2011.

- Sierra Pacific's Electric Resource Plan filed July 1, 1992 with the PSCN and re-filed by PSCN order on April 1, 1993, states that the Alturas-Valley Road 345kV transmission project is integral to our plans to meet our customers needs. Some discussion in this section is needed regarding this project as several alternatives cross the far northeast corner of Sierra County. Sierra Pacific proposes to construct a 345,000 volt electric transmission line running approximately 160 miles from Reno, Nevada northwest to Alturas, California to connect to existing Bonneville Power Administration's (BPA) facilities. The proposed Project is being constructed to increase the reliable capacity of Sierra's electric

6100 Neil Road P.O. Box 10100 Reno, Nevada 89520-0026 Telephone 702/689-4011

EXHIBIT 1

system, supply emergency protection for the Reno/Lake Tahoe customer load center, connect Sierra to a new market for low cost electricity, and to have capacity available on the line for other electric utilities and independent power producers, allowing them to transport power to their systems or to their customers.

- On September 20, 1993, Sierra Pacific transmitted to the Sierra County Planning Department copies of the pertinent documents pertaining to our Electric Resource Plan. Since the transmittal of these documents, the Public Service Commission of Nevada on October 25, 1993, issued a final order approving the Alturas 345kV Transmission Line Project within the Plan.

- On November 3, 1993, Sierra Pacific Power Company filed with the California Public Utilities Commission an Application for a Certificate of Convenience and Public Necessity which includes the Application, the Proponent's Environmental Assessment (Volume 1) and the Appendices (Volume 2) for the Alturas 345kV Transmission Line. A copy of this filing has been sent to the Sierra County Court Clerk.

B) Section 7. Noise Element

- On page 7-12 "Sierra Pacific Power (SPP) Substations: Loyalton Area", the fifth sentence need to be clarified and should read; "The sound power level...was measured to be approximately 69 to 73 dB at about 5 feet from the transformers."

- On page 7-4 Sierra Pacific disagrees with the definition of terms. The following corrections are offered:

  1) "Transportation noise levels are commonly expressed in terms of decibel level ((A) weighted) average...."
  2) ....this measurement is abbreviated: Ldn (dB(A))
  3) Noise contours (Ldn dB(A))

- On page 7-26 "Figure 7-7" should be "Table 7-7". The (A) weight average needs to be included on "Table 7-7" and "Table 7-8". Light Commercial, Light Industrial and Commercial land uses need to be referenced in "Table 7-7" and "Table 7-8".

- On page 7-28, Policy number 7. "Noise Mitigation Required" the first referenced Table should be "Table 7-9" not "Table 7-7". "Table 7-9" the Noise Level Description should reflect the (A) weighted average i.e.:

Mike Miller
November 15, 1993
Page 3

dB(A). Footnotes to this table should read: 1) In rural/isolated areas an adjustment of plus +5 dB(A) should be applied to the L_{eq} Noise Levels in Table 7-9; 2) Adjustments for duration should be:

a) L_{50} 30 minutes/hr. -Base
b) L_{25} 15 minutes/hr. +5 dB(A)
c) $L_{8.3}$ 5 minutes/hr. +10 dB(A)

- On page 7-29 Policy numbers 8 and 9 need to reference "Table 7-9" not "Table 7-7".

C) Section 15, Energy Element

- On page 15-17 the paragraph Transmission Lines should be rewritten as follows: As described previously, the existing electrical transmission system in Sierra County does not have adequate reliable capacity. Transmission lines are sometimes the source of controversy - visual impacts are often the greatest source of concern in rural areas, and other considerations, such as health effects from exposure to electromagnetic fields, come into consideration in more urban areas even though several comprehensive scientific reviews (including California Department of Health Services) of the published literature typically conclude that there is insufficient evidence to conclude that exposure to power frequency electromagnetic fields are a demonstrable health hazard. Due to potential visual concerns, transmission line routes should avoid densely populated areas, if possible.

- On page 15-35, Goals, Policies and Implementation Measures, Standards for Site Location; 1j. "....the proposed route shall meet the requirements for transmission lines that are set forth in the Energy Elements." In reviewing the Energy Elements, Sierra Pacific was unable to find any reference to requirements for transmission lines. The only reference is found on page 15-17 which addresses only perceptions. Therefore, the last portion of 1j. should be removed.

- On page 15-52, Policy #25 Transmission Line Approval, Sierra Pacific Power Company is an advocate of working with Sierra County, as well as other California Counties, with regards to routing of major transmission lines in order to find an acceptable alignment. Sierra Pacific views this as an informal and necessary process in obtaining Sierra County input prior to making application to the CPUC and other federal agencies. Sierra County's involvement is through CEQA process, of which the California Public Utilities Commission is the lead agency and

Mike Miller
November 15, 1993
Page 4

where applicable the NEPA process, of which a federal agency is the lead agency. Therefore, Sierra Pacific does not concur with the formal preliminary approval process proposed in item 25.

- On page 15-53; 15-54 and 15-55 Policy #26 - Transmission Line Design and Siting, it would appear that Sierra County is attempting to design and site transmission lines. Sierra Pacific finds that this section goes beyond just performance standards and steps in areas of expertise that is beyond the County's capabilities.

The following are rewrites of this section:

26. "The Zoning Ordinance . . . . subject to these general performance standards. . . . . in cases where the County . . . . permitting agency adopt similar general performance standards."

26a. Sierra Pacific feels the intent of this issue can be better served by the following performance standards:
"Mitigation measures for erosion control and soil stabilization shall be implemented and continued throughout the life of the project."

26b. This section presents an absolute which is not realistic. Visual concerns potentially can be mitigated through structure configurations, color, etc. Therefore, the "shall" should become "should."

26c. "Proposed transmission line projects will coordinate with wildlife management agencies regarding raptor nesting and raptor use areas."

26d. Refer to 26b.: "shall" should become "should."

26e. This section is again an absolute and therefore unrealistic. This section is also open to broad interpretation and doesn't take into account mitigation measures. Therefore, the following rewrite is offered:
"Transmission line projects should avoid crossing parks and designated recreation areas or wildlife refuges."

26g. 1) This section gets into specific design. Not all transmission lines use "towers"; there are two wood pole "H" frame structures or single wood pole structures, in which cases these structures can't be spaced at 1/4 mile intervals for design reasons. Therefore, the last sentence of this section should be removed.

Mike Miller
November 15, 1993
Page 5

In conclusion, Sierra Pacific requests that a transportation/utility corridor be established in the northeast corner of Sierra County. This transportation/utility corridor should be identified in the General Plan for Sierra County in order to accommodate Sierra Pacific's proposed Alturas 345kV transmission line.

If further clarification on our comments is needed or you have any questions or concerns, please feel free to call me collect at (702) 689-4747.

Sincerely,

Stephen P. Younkin
Project Manager, R/W & Permitting

SY:cb
wp.sy-30

cc: Roger Olack
Rich Leathers
Steve Siegel
Carl Barnett
Jack Byrom

DRAFT GENERAL PLAN REVISION REQUEST

NAME Sierra Pacific Power Co.

ADDRESS P.O. Box 10100 Reno, NV 89520-0400
Attn: Stephen Younkin, Proj. Mgr. R/W & Permitting

Policy/Text Change Request (Please include page number) _____
See letter dated 11/15/93

Land Use Designation Change Request: Existing OS-20

Draft General Plan _____ Your Proposal _____

Assessor Parcel Number 021-100-12 (attach map)

Parcel Size 176.36 ac. Property Owner Sierra Pacific Power Co.

Your relationship to Property: Public agency _____

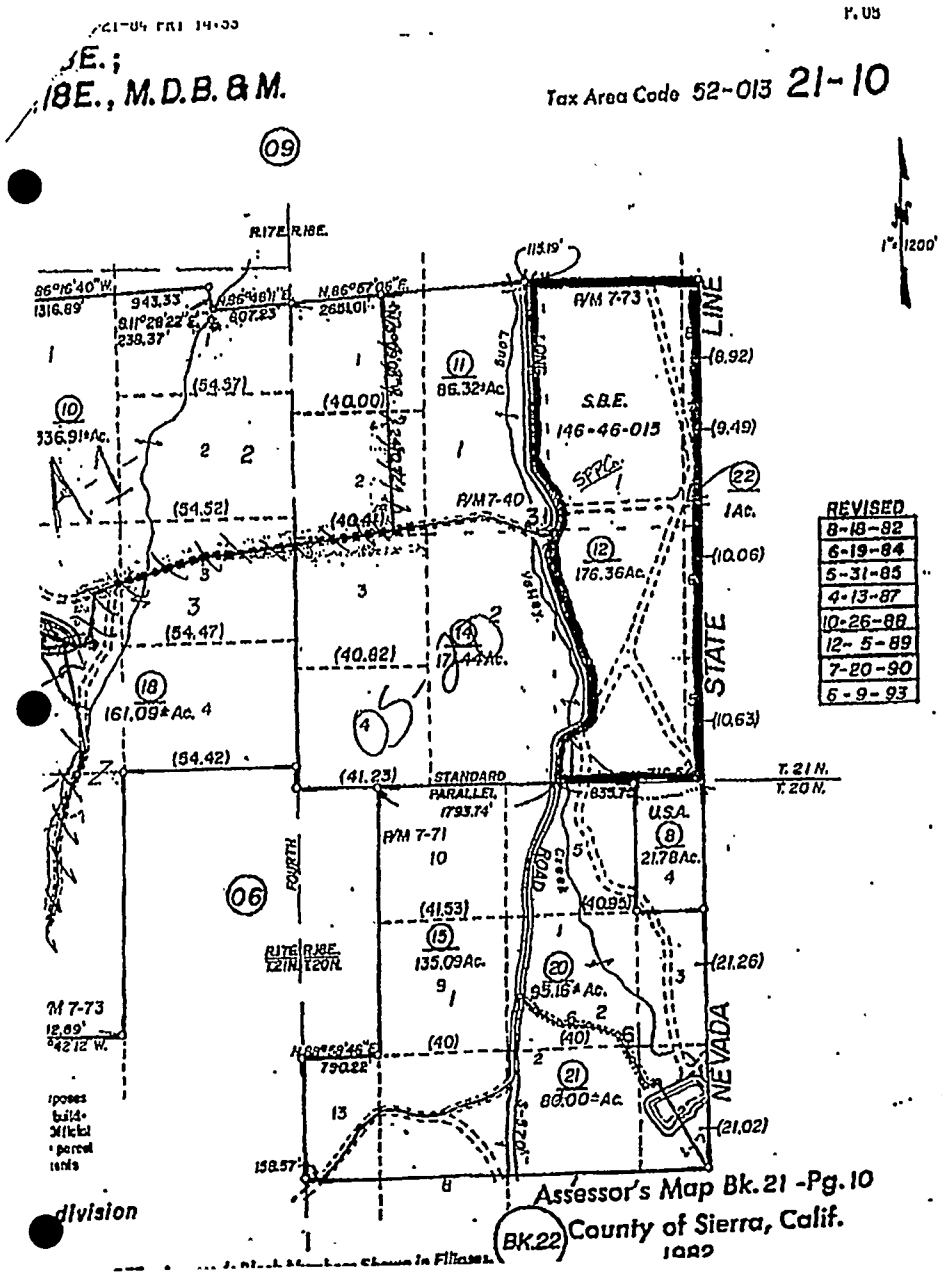
Owner X Interested Resident _____

Other (explain) _____

*Please attach copy of proposed Land Use Diagram from Draft General Plan locating this site _____

Discussion of your request: Parcel to be designated for Public Facility (ie: Electric Substation

RECEIVED
NOV 15 1993
SIERRA COUNTY PLANNING DEPT



BOARD OF SUPERVISORS, COUNTY OF SIERRA, STATE OF CALIFORNIA

IN THE MATTER OF)
THE ALTURAS INTERTIE) RESOLUTION 95-026
PROPOSED PROJECT)

WHEREAS, Sierra Pacific Power Company submitted to the California Public Utilities Commission a document entitled Alturas 345 KV Transmission Line Project - Proponents Environmental Assessment - October 1993; and

WHEREAS, this submittal, in part, became the basis for the California PUC Scope of EIR/EIS in it's evaluation of impacts associated with the proposed transmission line project; and

WHEREAS, the preferred route as contained in the "Proponents Environmental Assessment" is in Long Valley, Sierra County which is an environmentally sensitive, scenic area of Sierra County with an established residential area; and

WHEREAS, there exists an existing transmission line and/or corridor further east of Long Valley and within the State of Nevada that is the most likely, environmentally appropriate location for this proposed 345 KV line.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF SIERRA resolves and declares that the current, preferred location of the proposed electric transmission corridor/line as represented in Sierra Pacific Power Company's document entitled "Alturas 345 KV Transmission Line Project-Proponents Environmental Assessment" is strongly opposed and the State of California, Public Utility Commission is strongly urged to evaluate alternative routes, especially an alignment which is a current and approved transmission corridor which is predominantly within the State of Nevada and outside of Long Valley, Sierra County, California.

ADOPTED by the Board of Supervisors of the County of Sierra on the 7th day of February, 1995 by the following vote:

AYES: Supervisors McIntosh, Luchessi, McCaffrey, Bowling, Whitley
NOES: None
ABSTAIN: None
ABSENT: None

J. McCaffrey
JEROME MC CAFFREY, CHAIRMAN
BOARD OF SUPERVISORS

ATTEST:

Mary J. Jungi
MARY J. JUNGI
CLERK TO THE BOARD

APPROVED AS TO FORM:

Will. W. Pangman
WILLIAM W. PANGMAN
COUNTY COUNSEL

THE FOREGOING INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE
MAR 04 1995
Mary J. Jungi
COUNTY CLERK AND EX-OFFICIO CLERK OF THE BOARD OF SUPERVISORS IN AND FOR SIERRA COUNTY, CALIFORNIA
BY: Debbie Melson DEPUTY

C:\WP51\DATA\FORMS\ALTURAS.RES

EXHIBIT 2

BOARD OF SUPERVISORS, COUNTY OF SIERRA, STATE OF CALIFORNIA

DIRECTIONS FOR FORMAL)
COMMENT ON PROPOSED)
ALTURAS INTERTIE EIR/EIS) RESOLUTION NO. 95-081

FACTUAL BACKGROUND

A. Pursuant to public notice on March 28, 1995, the Sierra County Board of Supervisors met in joint session with the Sierra County Planning Commission for the purpose of conducting a public hearing on the Alturas Intertie Environmental Impact Report/Environmental Impact Statement ("EIR/EIS").

B. Based upon public testimony and documents received for the record, the Board of Supervisors makes the following Preliminary Findings:

1. There is a demonstrated need for additional electrical power for the region anticipated to be served by the proposed Alturas Intertie and, consequently, the Board does not oppose the Alturas Intertie project.

2. There is strong public opposition to the portion of the proposed power line route through Long Valley in Sierra County and the proposed location of the "Bordertown" Substation, also in Sierra County.

3. The EIR/EIS fails to assess alternatives to the location of the proposed substation.

4. The EIR/EIS fails to adequately evaluate alternatives to the transmission route.

5. The EIR/EIS is defective because it fails to evaluate and provide a rational basis for non-selection of several environmentally beneficial alternative routes other than through Long Valley including:

a. A route within an existing transmission corridor within the state of Nevada ("the Nevada Alternative")
b. A route east of the Peterson Range.

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

1. The County of Sierra does not object to the overall Alturas Intertie goals of providing more reliable and economically beneficial sources of power.

EXHIBIT 3

Resolution No. 95-081

2. The County of Sierra opposes that portion of the proposed transmission route through Long Valley (west of the Peterson Range in the Highway 395 corridor) and objects to the failure of the EIR/EIS to analysis alternative routes and to provide a rational basis for not selecting less environmentally sensitive alternative routes.

3. The County of Sierra opposes the present siting of the proposed Bordertown transmission substation and objects to the failure of the EIR/EIS to identify any alternatives to the proposed "Bordertown substation"; does not define the substation; nor does the document identify cumulative and/or growth-inducing impacts potentially resulting from the construction of the substation.

4. The Board of Supervisors directs preparation of formal comments to the Draft EIR/EIS.

5. The Sierra County Board of Supervisors hereby requests a 30-day extension from the California Public Utilities Commission within which to submit the County's formal written comments on the draft EIR/EIS (through June 2, 1995).

ADOPTED by the Board of Supervisors of the County of Sierra on the 4th day of April, 1995, by the following vote:

AYES: Supervisors McIntosh, Luchessi, Bowling, Whitley
NOES: Supervisor McCaffrey
ABSTAIN: None
ABSENT: None

COUNTY OF SIERRA

JEROME MC CAFFREY
CHAIRMAN, BOARD OF SUPERVISORS

ATTEST:

MARY J. JUNGI
CLERK OF THE BOARD

APPROVED AS TO FORM:

WILLIAM W. PANGMAN
COUNTY COUNSEL

L148SC28.RES 44951141

THE FOREGOING INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE. MAY 04 1995
ATTEST: Mary J. Jungi
COUNTY CLERK AND EX-OFFICIO CLERK OF THE BOARD OF SUPERVISORS IN AND FOR SIERRA CO. CALIFORNIA
BY Shirley Melton DEPUTY

2

BOARD OF SUPERVISORS, COUNTY OF SIERRA, STATE OF CALIFORNIA

IN OPPOSITION TO THE ALTURAS INTERTIE TRANSMISSION ROUTE AND SUBSTATION IN SIERRA COUNTY	))))	RESOLUTION NO. 95-128

FACTUAL BACKGROUND

A. After numerous hearings, discussions and document review pertaining to the Sierra Pacific Power Company's Alturas Transmission Line Project ("Alturas Intertie"), the Sierra County Planning Commission has recommended to the Sierra County Board of Supervisors that the Board oppose both the location of the proposed Bordertown Substation and the proposed transmission line route through Sierra County to Long Valley, California.

B. After numerous hearings and public testimony before the Board of Supervisors on the Alturas Intertie Project and review of the Alturas Intertie Draft EIS/EIR, the Board takes the formal position set forth below.

NOW, THEREFORE, BE IT RESOLVED AS FOLLOWS:

OPERATIVE PROVISIONS

1. The Sierra County Board of Supervisors strongly opposes the proposed location of the "Alturas Intertie Bordertown Substation" in the County of Sierra.

2. The Board of Supervisors strongly opposes the proposed routing of the Alturas Intertie transmission line through the County of Sierra and Long Valley, California.

ADOPTED by the Board of Supervisors of the County of Sierra on the 16th day of May, 1995, by the following vote:

AYES: Supervisors McIntosh, Luchessi, Bowling, and Whitley
NOES: Supervisor McCaffrey
ABSTAIN: None
ABSENT: None

COUNTY OF SIERRA

Jerome McCaffrey
JEROME MC CAFFREY
CHAIRMAN, BOARD OF SUPERVISORS

ATTEST:

Mary J. Jungi
MARY J. JUNGI
CLERK OF THE BOARD

APPROVED AS TO FORM:

William W. Pangman
WILLIAM W. PANGMAN
COUNTY COUNSEL

L148SC79 RES 62951110

EXHIBIT 4

DEPARTMENT OF FISH AND GAME
601 LOCUST STREET
REDDING, CA 96001
(916) 225-2300

August 29, 1994

GM

Exhibit 2

Mr. William D. Bixby
Administrative Officer
Lassen County Administration Building
707 Nevada Street
Susanville, California 96130

Dear Mr. Bixby:

Sierra Pacific Power Company
Proposed 345 kv Transmission Line

Thank you for your letter dated August 24, 1994, which included a copy of the Lassen County Board of Supervisors' Resolution No. 94-102 supporting Sierra Pacific Power Company's (Sierra Pacific) development of a 345 kv transmission line near Honey Lake Valley. You were correct in your assumption that the Department of Fish and Game (Department) was not aware of any discussions between Lassen Municipal Utility District (LMUD) and Sierra Pacific for this transmission line to provide power to the citizens of Lassen County.

In their "Proponent's Environmental Assessment", Sierra Pacific states that the purpose of their project is to connect the Reno/Lake Tahoe area with the northern California transmission system near Alturas, California. Sierra Pacific also states in Attachment 1, Application No. 93-11-018, Section 8, of their "Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity, Supplemental Information" that "as the project is currently designed, no service drops or substation taps are planned (sic) to be part of the proposed project." Section 8 does go on to state that such occurrences are possible but very expensive and that "substations can be added after the project is constructed. Assuming that this possibility occurs, the area it would most likely serve at would be the Susanville area". When questioned by Department staff as to the possibility of power being provided to the Susanville area, Sierra Pacific informed the Department that no points of service were currently anticipated beyond the stated project purpose.

Although the current application to the California Public Utilities Commission (CPUC) does not include service to Susanville, it is my understanding that Sierra Pacific may now wish to include the ability to provide power to LMUD as part of their proposed Alturas 345 kv transmission line project. Representatives of the company indicated at an August 23, 1994, meeting held by the CPUC and the US Bureau of Land Management (BLM), to discuss the Nevada alternative, that they may wish to make an amendment to their original application to address such a purpose. The CPUC at that time stated that further discussion of a Nevada alternative would depend upon the outcome of an August 23, 1994, meeting in Reno and the proper filing of amendment additions to Sierra Pacific's original application.

EXHIBIT 5

Mr. William D. Bixby
August 29, 1994
Page Two

Please be assured that the Department in no way opposes LMUD's ability to acquire a cheaper and more reliable electrical power source from Sierra Pacific. As we have with the Tuscarora Gas Transmission Company project, we will base our biological review and comments on what we determine is best for the environmental resources in accordance with the stated purpose of the project. We must assume that the company's stated purpose is accurate. If Sierra Pacific chooses not to amend the project to include the ability to provide service to Susanville, we will request continued consideration of the Nevada alternative to determine if the environmental effects would be greater, less or equal to the environmental effects of Sierra Pacific's preferred California route. However, if one of the purposes of the project as stated in the application to CPUC is to provide power to Susanville, we would concur that a Nevada route would no longer be a viable project alternative.

If you have any additional questions or desire any additional information, please contact Natural Heritage Supervisor Mr. Jim Nelson at (916) 225-2315.

Sincerely,

Richard L. Elliott

Richard L. Elliott
Regional Manager

cc: See attached list

THE PROPOSED ALTURAS TRANSMISSION LINE PROJECT EIR/S PUBLIC SCOPING MEETING HANDOUT

exhibit 3

INTRODUCTION

Sierra Pacific Power Company (SPPCo) has proposed the construction and operation of a 345,000 volt (345 kV) overhead electric power transmission line from Alturas, California to Reno, Nevada. In their consideration of SPPCo's applications for the proposed project, the California Public Utilities Commission (CPUC) and the U.S. Bureau of Land Management (BLM) are preparing an Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA), and an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA). The joint CEQA/NEPA document will be referred to as the EIR/S and will assess the potential environmental impacts of the proposed project and alternatives. The CPUC has contracted with an independent consulting firm, Aspen Environmental Group (Aspen), to prepare the EIR/S under the direction of CPUC and BLM.

MEETING AGENDA

1.	Welcome & Introductions	CPUC/BLM
2.	Environmental Review Process & Purpose of Scoping	CPUC/BLM Aspen
3.	Description of Proposed Project and Potential Environmental Review	Aspen
4.	Public Comments & Questions	Moderated by CPUC/BLM
5.	Future Opportunities for Public Involvement	Aspen
6.	Closing Comments	CPUC/BLM

PURPOSE OF SCOPING

The EIR/S on the proposed Alturas Transmission Line Project will focus on significant environmental effects. The process of determining the focus and content of the EIR/S is known as scoping. Scoping helps to identify the range of actions, alternatives, environmental effects, and mitigation measures to be analyzed in depth, and eliminates from detailed study those issues that are not pertinent to the final decision on the proposed project. Scoping is also an effective way to bring together and address the concerns of the public, affected agencies, and other interested parties. Significant issues may be identified through public and agency comments.

Scoping, however, is not conducted to resolve differences concerning the merits of the project or to anticipate the ultimate decision on the proposal. Rather, the purpose of scoping is to help ensure that a comprehensive and focused EIR/S will be prepared that provides a firm basis for the decisionmaking process.

Comments on the environmental issues that you feel should be addressed in the EIR/S may be given verbally at any of the scheduled scoping meetings listed in this handout by using the pink *Speaker Registration Card* insert. For your convenience, a separate *EIR/S Environmental Issues Questionnaire* is provided for submission of written comments. Written comments must be submitted at the scoping meetings or mailed. The deadline for written comments is May 27, 1994. All correspondence should be addressed to:

Julie Halligan (CPUC)/Peter Humm(BLM)
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

PUBLIC SCOPING MEETINGS

- Susanville — May 17, 1994 6 p.m.
  Monticola Club
  140 S. Lassen St.
- Alturas — May 18, 1994 6 p.m.
  Modoc Middle School
  906 W. 4th Street
- Reno/Sparks — May 19, 1994 6 p.m.
  Best Western McCarran Inn
  55 E. Nugget, Sparks
- Loyalton — May 25, 1994 6 p.m.
  The Social Hall
  County Road A-24

HANDOUT CONTENTS

EIR/S Task Flow	2
Potential Environmental Issues	3
Project Description	3
Future Opportunities for Public Involvement	4
Lead Agencies' Parallel Decisionmaking Process	4
Project Study Area Map	Insert
CPUC's Decisionmaking Process	Insert
BLM's Decisionmaking Process	Insert
Mailing List Registration Form (Blue Card)	Insert
Speaker Registration Card (Pink Card)	Insert
Environmental Issues Questionnaire (White Sheet)	Insert

exhibit 4

State of California

Public Utilities Commission
San Francisco

M E M O R A N D U M

Date : November 17, 1994

To : Thomas Krauel
Neighbors Opposed to Power Encroachment
P.O. Box 321
Alturas CA 96101

From : Julie Halligan
Alturas EIR/S Project Manager
Commission Advisory and Compliance Division

Subject : The Alturas Transmission Line Project EIR/S Documents You Requested

Enclosed please find a copy of Aspen Environmental Group's Proposal for the Preparation of an EIR/S for the Alturas Transmission Line Project as you requested in your letter dated October 18, 1994.

You may reproduce this document, however, the document must be returned to the CPUC at your own expense[1] no later than December 14, 1994:

If the document is not received by December 14, 1994, you will be billed a replacement charge of $0.25 per page.

Notes from the August 22-23, 1994 Agency scoping meetings conducted by the California Public Utilities Commission and the Bureau of Land Management are not available for public release. The Agency scoping meetings were working sessions and any notes taken by the Agencies or by the EIR/S contractor were taken for purposes of internal discussion and analysis only.

Please call me at 415/703-2776 if you have any further questions.

cc: Peter Humm, BLM

1 Return address: Julie Halligan, CACD Environmental and Energy Advisory Branch, 505 Van Ness Ave., Rm 3207, San Francisco CA 94102

Alturas Transmission Line EIR/S

CPUC Application No. 93-018-11,
U.S. BLM Application for Right-of-Way Grant, Case # CACA-31406

exhibit 5

PUBLIC NOTICE

As you may know, Sierra Pacific Power Company (SPPCo.) has submitted applications for construction and operation of a 345 kilovolt (kV) transmission line from Alturas in Modoc County, through Lassen and Sierra Counties, to the Reno area (Washoe County) in Nevada. The California Public Utilities Commission (CPUC), the State Lead Agency under the California Environmental Quality Act (CEQA), and the U.S. Bureau of Land Management (BLM), the Federal Lead Agency under the National Environmental Policy Act (NEPA), are preparing an Environmental Impact Report/Statement (EIR/S) on this proposed project. The Draft EIR/S is currently scheduled for release in late February, 1995.

SPPCo has recently submitted an Amendment to its Application for a Certificate of Public Convenience and Necessity to the CPUC for the construction of the Alturas Transmission Line Project. This Amendment states that the Alturas Transmission Line "adds the potential for providing future cost-effective, reliable electric service to the Lassen community to the general Project objective of providing such services to other potential users." Furthermore, SPPCo states in the Amendment that it is likely to execute a conditional Letter of Understanding (LOU) with Lassen Municipal Utility District (LMUD) for this purpose in the near future. Such future service to LMUD customers would be provided by a lateral line which has not yet been designed or sited. This lateral line would tie into the Alturas Transmission Line in eastern Lassen County, probably somewhere in the Wendel area, no earlier than year 2004.

The Alturas Transmission Line EIR/S in its analysis of the Proposed Project will include analysis of the potential LMUD connection. The assessment in this EIR/S would not preclude more detailed environmental consideration of such a connection in the future when specific plans and routing proposals become available.

If you have any comments, or need information you may write or call:

Julie Halligan
Alturas EIR/S Project Manager
CPUC
505 Van Ness Avenue, Room 3207
San Francisco, CA 94102
(415) 703-2776

Peter Humm
Alturas EIR/S Project Manager
U.S. BLM, Susanville District
705 Hall Street
Susanville, CA 96130
(916) 257-0456

Alturas Intertie

FILED

APR 3 1995

MARY J. JUNGI, COUNTY CLERK
BY: Mary J. Jungi DEPUTY CLERK

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.	Application 93-11-018 (U 903 E)

PREPARED DIRECT TESTIMONY OF
SIERRA PACIFIC POWER COMPANY

KATHLEEN M. DRAKULICH
Counsel for SIERRA PACIFIC POWER COMPANY
6100 Neil Road
Reno, Nevada 89520
(702) 689-4208

PREPARED DIRECT TESTIMONY
OF
ROGER T. OLACK

DOCKET NO. 93-11-018

Q. 1 Please state your name, occupation, and business address.

A. 1 My name is Roger T. Olack. I am the Project Manager for the Alturas Intertie Project for Sierra Pacific Power Company (Sierra), and my business address is 6100 Neil Road, Reno, Nevada 89511.

Q. 2 Does the attached exhibit entitled "Qualifications of Witness, Roger T. Olack," accurately summarize your background, education, and experience?

A. 2 Yes.

Q. 3 What is the purpose of your testimony?

A. 3 My testimony will cover the route selection process, the engineering and design information for the proposed project, the proposed low-cost measures to reduce the levels of electromagnetic fields, and the project implementation schedule.

Q. 4 In determining the location for a transmission project such as the Alturas Intertie, what is the first step?

A. 4 After a conceptual location is provided by Sierra's Resource Planning Group, the initial step is a routing study to determine the overall constructability of such a project.

Q. 5 Will you please describe Sierra Pacific's approach to this routing process for the Alturas Project?

A. 5 Starting in early 1993, Sierra retained the consulting firm of Resource Management International (RMI) to produce a constraints and siting study for the Alturas Transmission Line Project (project). The study was to address the constraints to powerline siting, permitting, and construction. The study was approximately 40-miles wide and 150-miles long covering approximately 6,000 square miles between Reno, Nevada, and Alturas, California. The study of constraints was based entirely on existing information. Constraints were placed in one of three categories: exclusionary, for all practical purposes, the area should not be crossed

EXHIBIT 6

(i.e., U.S. Bureau of Land Management (BLM) Wilderness Study A[illegible] significant, if it can reasonably be avoided, the area should not [illegible] crossed (i.e., wetlands); non-significant, while there will be site-speci[illegible] concerns, the area can be crossed (i.e., grazing lands). This study resulted in a network of 34 study segments totaling approximately 475 miles. As a follow up to the constraint study, in mid-1993, BioSystems Analysis, an environmental consulting firm, was hired to conduct a biological field reconnaissance survey over the 34 study segments identified by RMI. BioSystems conducted studies for a list of plant and animal species and habitats of concern generated jointly by the California Department of Fish and Game, the BLM, and the U.S. Forest Service (USFS). At the same time, PAR Environmental Services conducted a literature search of the study segments for known historical and archaeological resources. The study area was a one-mile corridor along the designated centerlines in the study segments. In a parallel effort, engineering and land-use review by Sierra was also occurring along the proposed study segments to analyze terrain features, road access, potential visual impacts, soil conditions, and existing land usage (i.e., agricultural, etc.). These studies were incorporated into a Geographic Information System (GIS) which would allow the layering of the information collected so that the different aspects of the project could be looked at either in total or as individual components of the routing analysis. Additionally, with respect to routing, input was solicited from federal agencies that would be involved (BLM, USFS, and Army Corps of Engineers) as well as city and county agencies in Modoc, Lassen, Sierra, and Washoe counties.

Q. 6 What was done with the results of these studies?

A. 6 An interdisciplinary team from Sierra, including specialists in the areas of environmental issues, engineering, land use, and permitting, reviewed the above-referenced study segments with regard to eight specific criteria. These criteria were biologic resources, cultural resources, engineering, constructability, land use, permitting, cost, and commonality with another linear project proposed for this area, the Tuscarora Gas Pipeline Project. This review resulted in the development of eight alternative routes between Alturas, California, and Reno, Nevada, which ranged from 160 to 170 miles.

Q. 7 Please describe how these routes were formally proposed.

A. 7 The alternative routes were submitted by Sierra to the California Public Utilities Commission (CPUC) in November 1993 as part of Sierra's Proponent's Environmental Assessment (PEA), along with an Application for a Certificate of Public Convenience and Necessity (CPCN). Sierra's

Sierra Pacific Power Company P.O. Box 10100

Alturas Intervenor

FILED

APR 3 1995

MARY J. JUNGI, COUNTY CLERK
BY: Mary J. Jungi DEPUTY CLERK

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.	Application 93-11-018 (U 903 E)

PREPARED DIRECT TESTIMONY OF
SIERRA PACIFIC POWER COMPANY

KATHLEEN M. DRAKULICH
Counsel for SIERRA PACIFIC POWER COMPANY
6100 Neil Road
Reno, Nevada 89520
(702) 689-4208

EXHIBIT 7

PREPARED DIRECT TESTIMONY
OF
ROGER T. OLACK

DOCKET NO. 93-11-018

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A. 7 The alternative routes were submitted by Sierra to the California Publi Utilities Commission (CPUC) in November 1993 as part of Sierra' Proponent's Environmental Assessment (PEA), along with an Applicatio for a Certificate of Public Convenience and Necessity (CPCN). Sierra'

preferred alternative and the seven other alternatives were designated in the PEA to satisfy a portion of the permitting requirements of the CPUC. The PEA was not intended to portray all of the comprehensive studies required for compliance with the National Environmental Policy Act (NEPA) or the California State Environmental Quality Act (CEQA). These eight routes were designated for detailed study in a joint Environmental Impact Report and Environmental Impact Statement, the preparation of which was to be directed by CPUC and the BLM.

Q. 8 Was this the end of Sierra's involvement in the routing process?

A. 8 No. In January 1994, prior to the CPUC's acceptance of Sierra's application, Sierra conducted a series of nine meetings in Modoc, Lassen, Sierra, and Washoe counties with the general public, as well as business and community leaders, to determine any concerns that the public might have with any of the routes submitted in the PEA. Meetings with individual parties, either residential or business landowners, as well as meetings with individual agency contacts were also conducted.

Q. 9 What was the result of this outreach program?

A. 9 On a larger scale, Sierra's preferred location for the Hilltop Substation at Alturas was changed at the request of residential homeowners and local government officials, and Sierra's preferred location for the Bordertown Substation was moved approximately one-half mile north of its initial location due to the concerns of an adjacent landowner. Also, numerous other changes and additions were made to the routing matrix in an attempt to address concerns of the respective agencies and members of the public.

Q. 10 Did this complete the routing process?

A. 10 Once the CPUC accepted the Proponent's Environmental Assessment in February 1994 and hired the Aspen Environmental Group as their environmental contractor, additional scoping meetings were held with both the general public and the agencies, and additional changes to the routing were suggested for detailed study in the environmental process.

Q. 11 What is the status of the routing today?

A. 11 At this time, the CPUC and the BLM, along with their environmental contractor, the Aspen Environmental Group, have taken all the study information collected to date and have developed what is known as the "Environmentally Superior Alternative" in the Draft Environmental Impact Report/ Statement (DEIR/S). A series of public hearings will be

Tile

ALTURAS
INTERTIE PROJECT
Sierra Pacific Power Company
Your Energy People

August 22, 1994

RECEIVED
BY
SEP 6 1994
PLANNING & BUILDING DEPARTMENT
SIERRA COUNTY

Mr. Don Bowling
Chairman
Sierra County Board of Supervisors
P.O. Drawer D
Downieville, CA 95936

Re: Transmission Agency of Northern California Transmission

Dear Mr. Bowling:

Sierra Pacific Power Company has become aware of a potential misunderstanding regarding discussions of a trans-Sierra transmission line involving the Transmission Agency of Northern California. This letter is to inform the Sierra County Board of Supervisors of our intentions in this matter.

Sierra Pacific would like to make it clear that there are no plans to interconnect a trans-Sierra transmission line with the Alturas Intertie Project. The Alturas Intertie stands alone as a solution to meet the needs of northern California and Nevada customers.

The Transmission Agency of Northern California approached Sierra Pacific to inform us of their preliminary work investigating transmission alternatives to meet their customers' needs. They asked for our input concerning potential line routes. Alternatives included a transmission line crossing the Sierras as well as others that would result in transmission lines located only in central and southern California. We informed them of environmental concerns which have been raised, but did not express a desire for them to cross the Sierras and interconnect with the Alturas line.

The Transmission Agency of Northern California is performing preliminary planning work, which is being encouraged by state and federal regulatory agencies. We plan to continue to observe these planning efforts; however, Sierra Pacific is not inviting the Transmission Agency of Northern California to cross the Sierras nor are we inviting them to interconnect with the Alturas Intertie.

EXHIBIT 8

6100 Neil Road, P.O. Box 10100, Reno, Nevada 89520-0400 Telephone 702/689-3891

Mr. Don Bowling
August 22, 1994
Page 2

In closing, Sierra Pacific hopes that the preceding information provides insight into our plans and relieves concerns that our future transmission projects are destined to be located in Sierra County.

Very truly yours,

Stephen P. Younkin
Project Manager, R/W & Permitting

SY/tc
sy0826a

cc: Duane Nelson
Roger Olack
Tim Beals - Sierra County

TRANSMISSION AGENCY OF NORTHERN CALIFORNIA
P.O. Box 15129, Sacramento, CA 95851-0129 (916) 852-1673

August 25, 1994

RECEIVED
BY
AUG 31 1994
PUBLIC WORKS
SIERRA COUNTY

Mr. Tim H. Beals
Director
Sierra County Public Works Department
P. O. Box 98
Downieville, CA 95936

Dear Mr. Beals:

On July 11, 1994, staff of the Transmission Agency of Northern California (TANC) met with you and Julie Griffith of the Sierra County Public Works Department to discuss a preliminary study on the feasibility of a transmission line across the northern Sierra Nevada between Lake Tahoe and Redding, California. The intent of the meeting was to discuss some very preliminary investigations into transmission paths to Southern Nevada. Following that meeting, an article appeared in *The Mountain Messenger* that included information on TANC's study. Unfortunately, the article was incorrect with respect to a number of significant issues that we believe need to be corrected for the record.

Following are our comments on the article, entitled "More Power Lines Proposed Through County" printed in *The Mountain Messenger* on July 21, 1994.

- The study is not limited to Sierra County; it includes review of corridor opportunities as far north as Redding, California and as far south as Bakersfield, California.
- There is no intent to connect the possible transmission line to Sierra Pacific Power Company's Alturas Project.
- Potential transmission corridors are being evaluated in both northern and southern California to access possible interconnection points in southern Nevada. Various constraints and opportunities exist for all corridors. At this time, it is uncertain where, if at all, a transmission line might be constructed since project feasibility evaluations have not yet been completed. In addition to environmental considerations, economic and engineering design considerations will also affect the feasibility of alternative corridors.
- The height of transmission towers for a 500-kV line typically ranges from 80 to 120 feet. The reference to tower heights of 120 feet is somewhat misleading. The taller towers are generally only used when the terrain necessitates a longer span (e.g., river crossings) or special clearance requirements.

EXHIBIT 9

A Public Entity whose Members include:
Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Modesto Irrigation District, Palo Alto, Plumas-Sierra Rural Electric Cooperative, Redding, Roseville, Sacramento Municipal Utility District, Santa Clara, Turlock Irrigation District, Ukiah

Mr. Tim H. Beals
August 25, 1994
Page Two

- The article refers to a four-mile wide swath through Comptonville, Pike, Alleghany, Sierra City, Bassetts, and Beckwourth. While potential transmission corridors are studied at these widths, the actual right of way necessary for a 500-kV line is typically 200 feet wide or less, and transmission lines are typically routed to avoid population centers.

- Again, TANC is only conducting preliminary investigations into many different routes. No specific route has been identified.

We hope that this information assists with your understanding of TANC's preliminary investigations.

Sincerely,

Chris Kiriakou

Chris Kiriakou, Chairman
TANC Planning and Environmental Committee

cc: Sierra County Board of Supervisors

RECEIVED APR 24 1995

The City of Sparks

PLANNING DEPARTMENT

April 20, 1995

Ms. Julie Halligan/Mr. Peter Humm
California Public Utility Commission/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Public Agency Comment Set 6

Dear Ms. Halligan and Mr. Humm:

This letter is to reconfirm the City of Sparks support for the environmentally superior route for the electric transmission line and opposition to the alternative that routes through Spanish Springs Valley and Sparks, i.e., the Nevada route. Attached is the City's letter dated August 22, 1994. The information provided within it is still appropriate. In addition we would add the following comments:

> While the Nevada route proposal uses existing corridors through the built portions of Sparks, this corridor will need to be widened. A conservative estimate of existing houses that would be within any widened project is sixty-four homes. These homes are in the Satellite Hills subdivisions and the newly constructed Vintage Hill subdivision. That number of homes does not address homes what would abut this expanded area or any homes in Spanish Springs area.
>
> This new line is intended to provide continuous service to the region if an incident should occur with the existing line, currently running through Sparks. If both lines use the same corridor through Sparks the potential for disruption of service in both lines, for the entire region, could increase.
>
> The environmentally preferred alternative is supported by the Lassen Municipal Utility district and the Lassen County Board of Supervisors, as they will also benefit from that line.

PA. 6-1

These comments as well as our previous comments reinforce the concerns we have with the alternative through Sparks.

Sincerely,

Margaret Powell, AICP
Acting Community Development Director

City Hall: 431 Prater Way, P.O. Box 857, Sparks, Nevada 89432-0857, (702) 356-2338, FAX (702) 353-2489

The City of Sparks

PLANNING DEPARTMENT

August 22, 1994

Ms. Julie Halligan (CPUC)
Mr. Peter Humm (BLM)
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Ms. Halligan
Mr. Humm:

This input is related to the proposed alternate route for the EIR/S on the 345 KV Alturas Transmission Line Project proposed by Sierra Pacific Power Company. First, let me vehemently voice my objection to the amount of time that this office has had to absorb, understand and comment upon a project of this magnitude. From the time of our first formal notification received in our office on August 15, 1994 to the time of the upcoming meeting of Tuesday, August 23, 1994 is only 6 working days. City Staff has diligently set to become educated on this process but since we have had no previous involvement in this proposed alignment we are uninformed about the various aspects of this project. Suffice it to say that we request a minimum of 30 days past the initial meeting to involve elected and appointed officials, concerned citizens living along the proposed corridor and environmental groups in this decision.

Our first observation is that environmental considerations of the alternate route outlined in the conceptual draft of 8-5-94 under that section never once mentions the City of Sparks, a municipality of 58,000 residents and 17 square miles as being in the corridor route. The corridor route as best we can surmise since the maps are woefully inadequate would require additional right of way to the existing corridor and this additional 100 feet would require the acquisition/demolition of existing housing. Third, there are a number of public recreational facilities within the City in the form of a 13 acre park (Pah Rah) and in the form of a regional park facility (Section 235) which would be adversely affected by this additional corridor. There as a school in the form of Jerry Whitehead Elementary School that is adjoining the corridor as well. The Nevada corridor outside of Sparks has significant Native American archeological and cultural resources that must be documented. Beyond this there is an alternative within the Nevada corridor that would have less of an impact on populated areas that should be considered as a 2nd alternative.

City Hall: 431 Prater Way, P.O. Box 857, Sparks, Nevada 89432-0857, (702) 353-2310

Page 2

The City conservatively estimates that 1,500 - 2,000 homes would be physically or visually affected by this installation totalling between 4,000 - 5,000 residents. In fact, new housing is going up in close proximity to the corridor that would be demolished.

This corridor must be compared to the Truckee Meadows Regional Plan in terms of its affects on those relevant plan policies relating to open space, animal habitat preservation, etc.

In terms of socio-economics the acquisition of housing along the corridor is certainly in the tens of millions of dollars if it runs into hundreds of homes. This impact must be programmed into overall costs of this project.

In your scoping letter relative to visual resources somehow the 58,000 Sparks residents are not part of the inventory of affected parties and yet every citizen would be affected.

In conclusion, the Nevada Route Alternative grossly mischaracterizes the Sparks environment through which this corridor would pass as "offering less potential for conflict with existing and planned land uses". Certainly I am not aware of any communication from Aspen Environmental Group that would have given real land use substance to such a statement.

For the record, I am submitting the adopted Master Plan for Growth Management, the Spanish Springs Sphere of Influence Plan or other pertinent land use documents.

I urge first that this alternative be modified or dropped and that the City has at least 30 days to compose a credible response to this issue.

Respectfully submitted,

Greg Evangelatos, A.I.C.P.
Community Development Director

RECEIVED

The City of Sparks

Office of the
CITY CLERK

May 16, 1995

Ms. Julie Halligan
Mr. Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, California 91301

Reference: Alturas Transmission Line

Dear Ms. Halligan and Mr. Humm:

On May 15, 1995, the Sparks City Council unanimously passed Resolution No. 2340 in opposition to the Nevada Alternate Route for the Alturas Transmission Line Project. The CPUC Application Number is 93-11-018 and the BLM Case Number is CACA-31406.

Enclosed is a photocopy of the Resolution to be included for consideration in the Final Environmental Impact Report/Statement.

Very truly yours,

Deborine J. Peebles
City Clerk and
Clerk of the City Council

bc

Enclosure (1)

Copy:

City Attorney w/copy
Agenda Item 3
File - Res. No. 2340

City Hall: 431 Prater Way, P.O. Box 857, Sparks, Nevada 89432-0857, (702) 353-2350, FAX (702) 353-CITY

3(a)
5-15-95

RESOLUTION NO. 2340 INTRODUCED BY COUNCIL

RESOLUTION IN OPPOSITION TO THE NEVADA ALTERNATE ROUTE FOR THE ALTURAS TRANSMISSION LINE PROJECT.

WHEREAS, Sierra Pacific Power Company is proposing to construct a 345,000 volt (345 kV) overhead electric power transmission line from the vicinity of Alturas, California, to Reno, Nevada, and

WHEREAS, two routes for the proposed line are under consideration for approval by the California Public Utilities Commission and the United States Bureau of Land Management, and

WHEREAS, the Environmentally Superior Route generally parallels U.S. 395 while avoiding environmentally sensitive areas and minimizing costs to electric consumers, and

WHEREAS, the Nevada Alternate Route passes through remote and pristine recreation and wilderness areas of Northern Washoe County, proceeds through the Truckee River Canyon from Wadsworth, passes through recently developed residential areas in Northeast Sparks and has a higher construction cost estimated at TWENTY MILLION DOLLARS ($20,000,000.00) which will be borne by electric consumers.

NOW, THEREFORE, IT IS HEREBY RESOLVED that the City Council of the City of Sparks opposes construction of the Alturas Transmission Line Project along the Nevada Alternate Route for the following reasons:

1. The Environmentally Superior Route will lower the cost to utility rate payers, minimize environmental damage and visual blight and is supported by the Lassen Municipal Utility District and the Lassen County Board of Supervisors.

2. The Nevada Alternate Route will increase the cost to utility rate payers, severely damage pristine recreation and wilderness areas and cause visual blight, both in remote areas and in populated areas.

3. The Nevada Alternate Route will require the widening of an existing electric power transmission corridor in Northeast Sparks which could necessitate the acquisition and destruction of at least sixty-four (64) homes in the Vintage Hills and Satellite Hills Subdivisions.

CITY OF SPARKS
OFFICE OF THE CITY CLERK
MAY 11 1995

3(a)
5-15-95

4. The visual impact of the additional electric power transmission line in Sparks and through the hills north of Sparks will diminish property values of homes near the line and recreational usefulness of undeveloped land.

5. By placing two electric power transmission lines in the same corridor in Sparks, the Nevada Alternate Route poses a danger of disruption of continuous service which is required in the Truckee Meadows should an incident occur.

PASSED AND ADOPTED this 15th day of May, 1995, by the following vote of the City Council:

AYES: Mayer, Walker, Armstrong, Cook Henderson, Zive

NAYS: None

ABSTAIN: None

ABSENT: None

APPROVED this 15th day of May, 1995, by:

BRUCE H. BRESLOW, Mayor

ATTEST:

DEBORINE J. PEEBLES, City Clerk

APPROVED AS TO FORM:

STEVEN P. ELLIOTT, City Attorney

The City of Sparks

CITY OF SPARKS
OFFICE OF THE CITY CLERK
MAY 11 1995

3(2)
5-15-9

The City of Sparks

RECEIVED MAY 30 1995

Office of the
CITY CLERK

May 26, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Re: Opposition to the Nevada Alternate Route Proposed for the Alturas 345kv Transmission Line

Dear Ms. Halligan and Mr. Humm:

In response to a request from the Sparks City Council, please enter the enclosed items in opposition to the Nevada Alternate Route Proposed for the Alturas 345kv Transmission Line:

1) A video tape of the Public Hearing held May 15, 1995 to receive public comment and approve Resolution No. 2340 in opposition to the Nevada alternate route proposed for the Alturas 345kv transmission line. The tape is entitled "Sparks City Council Power-Lines Section 5/15/95".

2) Resolution No. 2340, unanimously approved by the Sparks City Council on May 15, 1995, a "RESOLUTION IN OPPOSITION TO THE NEVADA ALTERNATE ROUTE FOR THE ALTURAS TRANSMISSION LINE PROJECT".

3) Unofficial minutes of the Special Meeting of the Sparks City Council held May 15, 1995, a Public Hearing to receive public comment and approve Resolution No. 2340 in opposition to the Nevada alternate route proposed for the Alturas 345kv transmission line.

PA. 6-2

Very truly yours,

Deborine J. Peebles
City Clerk and
Clerk of the City Council

Enclosures: (3)

City Hall: 431 Prater Way, P.O. Box 857, Sparks, Nevada 89432-0857, (702) 353-2350, FAX (702) 353-CITY

RESOLUTION NO. 2340 INTRODUCED BY COUNCIL

RESOLUTION IN OPPOSITION TO THE NEVADA ALTERNATE ROUTE FOR THE ALTURAS TRANSMISSION LINE PROJECT.

WHEREAS, Sierra Pacific Power Company is proposing to construct a 345,000 volt (345 kV) overhead electric power transmission line from the vicinity of Alturas, California, to Reno, Nevada, and

WHEREAS, two routes for the proposed line are under consideration for approval by the California Public Utilities Commission and the United States Bureau of Land Management, and

WHEREAS, the Environmentally Superior Route generally parallels U.S. 395 while avoiding environmentally sensitive areas and minimizing costs to electric consumers, and

WHEREAS, the Nevada Alternate Route passes through remote and pristine recreation and wilderness areas of Northern Washoe County, proceeds through the Truckee River Canyon from Wadsworth, passes through recently developed residential areas in Northeast Sparks and has a higher construction cost estimated at TWENTY MILLION DOLLARS ($20,000,000.00) which will be borne by electric consumers.

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2. The Nevada Alternate Route will increase the cost to utility rate payers, severely damage pristine recreation and wilderness areas and cause visual blight, both in remote areas and in populated areas.

3. The Nevada Alternate Route will require the widening of an existing electric power transmission corridor in Northeast Sparks which could necessitate the acquisition and destruction of at least sixty-four (64) homes in the Vintage Hills and Satellite Hills Subdivisions.

Page 1 of 2 Pages

CITY OF SPARKS
OFFICE OF THE CITY CLERK
MAY 11 1995

3(2)
5-15-95

4. The visual impact of the additional electric power transmission line in Sparks and through the hills north of Sparks will diminish property values of homes near the line and recreational usefulness of undeveloped land.

5. By placing two electric power transmission lines in the same corridor in Sparks, the Nevada Alternate Route poses a danger of disruption of continuous service which is required in the Truckee Meadows should an incident occur.

PASSED AND ADOPTED this 15th day of May, 1995, by the following vote of the City Council:

AYES: Mayer, Walker, Arrstrong, Cook Henderson, Zive

NAYS: None

ABSTAIN: None

ABSENT: None

APPROVED this 15th day of May, 1995, by:

BRUCE H. BRESLOW, Mayor

ATTEST:

DEBORINE J. PEEBLES, City Clerk

APPROVED AS TO FORM:

STEVEN P. ELLIOTT, City Attorney

Page 2 of 2 Pages

CITY OF SPARKS
OFFICE OF THE CITY CLERK

MAY 1 1 1995

1

SPECIAL MEETING OF THE SPARKS CITY COUNCIL
MAY 15, 1995 4:15 P.M.

1. Call to Order

Tape 1, 2820
The special meeting of the Sparks City Council was called to order by Mayor Bruce Breslow at 4:18 p.m. in the Council Chambers of the Legislative Building, 745 Fourth Street, Sparks, Nevada.

2. Roll Call

Tape 1, 2850
Mayor Bruce Breslow, City Clerk Deborine Peebles, Council Members John Mayer, Ernest Walker, Tony Armstrong, Cindy Cook Henderson, Phil Zive, City Attorney Steve Elliott, City Manager Terry Reynolds, PRESENT.

Staff present: Stan Sherer, Jonnie Pullman, Brian Doran, Penny Harrison, Sue Utterback, Bill Isaeff, Terri Thomas, Shaun Carey, Rob Pyzel, Glen Godfrey, Sandy Landeck, Margaret Powell, Ron Irwin, Dale Richardson, John Gonzales, John Dotson, Barbara Clauson and Loretta Hadlock.

3. Approve Resolution No. 2340 - In Opposition to the Nevada Alternate Route Proposed for the Alturas 345kv Transmission Line

Tape 1, 2880
Mayor Breslow explained he had testified at a public hearing held by a California judge seeking comment on the Alturas power line and he had some concerns with the alternate route proposed to go through Sparks, specifically through Spanish Springs, around Wingfield Springs, through Satellite Hills and Vintage Hills. He voiced concern that residents of Vintage Hills and Satellite Hills subdivisions were never notified and had not had the opportunity to attend the public hearing and he was one voice from Sparks against the 150 who wanted the route to go somewhere else and that somewhere else is Sparks. He pointed out that the power lines are ugly, they do not serve aesthetic purposes anywhere and no one wants them anywhere near their property and if those people are successful in their lobbying efforts to reopen the alternative, which would go through Sparks, he wanted to get some public comments on the record. He explained that the time frame to receive public comment had been extended and he was requesting the City Clerk to submit this special City Council meeting to the court as public record.

Mike Reed, Director, Governmental Affairs, Sierra Pacific Power Company (SPPCO), along with Roger Olack, Project Manager, Alturas Intertie Project, SPPCO, and Jim Roulias, Director, Major Mining Accounts, SPPCO, presented information on the routes they are looking at, how the Sparks route was inserted into the process, what the public hearing process is going to be, and information on what the Council and City could do to protect its residents.

Mr. Olack stated he wanted to make it very clear that SPPCO has never proposed nor supported nor do they want a route through Sparks for this project. He said the message to CPUC and the BLM has been very clear and very consistent over the past two years that

2

the people in the City of Sparks do not want this power line in their city. He pointed out that in the Draft Environmental Impact Statement (DEIS), the CPUC, BLM and their environmental contractor, Aspen Environmental, agreed there is a route designated as the "environmentally superior route" and that route does not go through Sparks. He explained the reason the alternate route was proposed is due to a comment made at a public meeting early in the scoping process whereby the people in California said it serves Nevada, put it in Nevada along existing lines in Nevada.

The SPPCO engineer said that after looking at that routing, and working with Sparks' planners and staff, it became apparent and is well documented that the impacts to the City of Sparks were so significant that they ruled out that option for further study. He said the issue continues to be raised by a few people unwilling to accept the designated environmentally superior route and the compromises proposed to address their concerns of routing and relocating of facilities.

Using a map which designated the "environmentally superior route" and what has been designated as the Nevada alternate (the route through Sparks), Mr. Olack explained the alternate Alturas intertie project as a 165-mile, 345 kilovolt electric transmission line to bring power from the tap of the Bonneville Power Administration into Reno; that it was recognized in the resource planning process in the Nevada Public Service Commission (PSC) in October, 1993 as the most cost efficient transmission option that SPPCO could construct to serve its customers. He noted issues of liability for the electric system, capacity of the electric system, and economy of the electric system.

He pointed out the "environmentally superior route" designated in the DEIS is roughly 85% in California and 15% in Nevada. He explained the line goes east of Alturas, parallel to 1,000-volt Los Angeles Department of Water and Power line for approximately 200 miles, comes back in about 30 miles along the existing transmission lines and goes through a section of Sparks on its way into the North Valley Road Substation. He said this routing was suggested in May, 1994 in a series of scoping meetings. He pointed out one of the critical features why they don't want to parallel the line through Sparks is because they want to come into Reno from a western direction. In that way, he said they can have two pipelines into the city and if anything happens to one, they have the other as redundancy and therein lies the reliability issue.

Asked when they would run out of power and what would happen if they don't build this to the capacity for power, Mr. Olack said they would immediately look at other alternatives through the resource planning process as well as considering how the load is building and

3

how they might serve that load. He said their forecast right now is that the line needs to be in service by the winter peak of 1996. He stated he did not have a number that would translate into dollars but it is their goal to stabilize rates in every way possible. He said they import about 50% of their power and this will give them another market from which to import power and stabilize rates.

Mr. Reed pointed out that this would give them the ability to obtain more power out of the northwest which is less expensive than what they can generate. He said their expectations are that the line will pay for itself in bulk power transactions. There may be some initial impact but in the long haul he said, but it should stabilize and reduce the rates. He informed Council that the PSC had approved a rate freeze through 1997 and they were requesting, in their discussions with Washington Water Power, that the freeze go through the year 2000. He pointed out that they could buy power in the northwest for 2 cents per kilowatt versus their ability to generate it and got 4 or 4-1/2 cents or more.

As to placing the line underground, Mr. Reed said that they had considered that option but undergrounding would create a weak link in the system. He noted that undergrounding a 345kv line is being done but there are a lot of maintenance issues with the line as well as the cost factor. He said the cost basis is about 12 to 1 and this type of line would cost roughly about $350,000 per mile aboveground and below ground it would cost about $4.5 million. He explained that to build an underground line they would need an pressurized oil filled pipe, the oil needs to be cooled and they would need an oil tank and substations at both ends where it goes underground and then comes back up. He noted significant maintenance issues and the possibility of potential oil leaks and other environmental issues.

Asked the total cost of the line, Mr. Olack stated the total cost of the project is $120 million dollars with the line costing half that amount. He noted substations are involved as well as rival opposition. He pointed out that if the alternate line went through Sparks, the project would cost an additional $20 million, not including the purchase of the 64 homes at $12 million. He further explained the $20 million was based purely on the 70 additional miles which would have to be traversed (roughly $300,000 per mile).

Discussion ensued on how SPPCO would acquire the 64 homes in Vintage Hills and Satellite Hills and if that would be initial buyout or eminent domain. Mr. Olack said their modus operandi as far as purchasing any property is to negotiate rather than to condemn. He said the result of the process from California and ultimately Nevada is a "Certificate of Public Convenience and Necessity" which dictates that the benefits to the many outweigh the benefits

to the few along the route. He said that is not the way they prefer to do business. He advised that along the "environmentally superior route" there were no homes affected to the extent they are in Sparks.

Asked if underground lines would have the same effect with EMFs below as they do above, Mr. Roulias explained if two transmission lines are relatively close together in the same corridor, the effect can be additive as far as EMFs are concerned and are directly proportional to the distance from the source. As you get away form the source they decrease very rapidly. He pointed out that depending on how the phases are arranged, it can also create a cancellation effect but most generally it will be additive. He advised that the main advantage with undergrounding is that the phases can be placed close together and would result in a net cancellation effect but that earth does not eliminate or insulate EMFs, there is still permeation of fields from the transmission line.

Mr. Olack said they anticipated a decision from the CPUC in October, 1995 and they would commence construction on substation portions late this year. He noted that construction of the transmission line portion would not commence until March, 1996 to be in service by the end of 1996.

Asked if Sparks had the legal ability to deny the permitting process (building and structure permits) to allow SPPCO to go through Sparks, City Attorney Steve Elliott responded that City staff could attempt to do so. He advised that the power company has certain rights under statute to condemn land and pursue their mission and the city would probably end up in litigation which would only delay the issue.

Council Members questioned whether Washoe County or the State of Nevada had expressed any opposition or taken a stand on the alternate route. Mr. Olack explained that in developing the alternate route in August, 1994, the CPC and the BLM had what they called "agency scoping needs" and at that time representatives from all the various Nevada agencies came forward and provided comment on the route. Representing Sparks, then Community Development Director Greg Evangelatos came forward on August 22, 1994, and made it very clear, along with a number of other Nevada agencies, that they did not favor this route. He said they also pointed out the route was 70 miles longer and 70 miles more of environmental impacts. As to the preferred route, he said there are some visual concerns being expressed and suggested by the open space planning groups in Washoe County and they are providing those comments to the CPUC and BLM.

Asked to described the route as it enters Nevada, Mr. Olack explained that from the Bordertown substation they are proposing to traverse the northeastern shoulder of Peavine,

about 1/2 mile back from any of the areas along there (Horizon Hills) and routing further in from other areas to get away from residents of concern in the Hoag Road area, then come into an existing corridor which currently contains a 120kv line, a 60kv line, a 24-line distribution line and gasline. He noted that was at the request of the City of Reno to keep the line on the north side of that corridor and come into North Valley Road Substation from that direction.

Asked if they had to do battle with anyone in the Black Springs area, Mr. Olack said there are people in Horizon Hills who are specifically concerned. Council Members noted phone calls from residents in those areas that the line is within 120 feet of their homes and asked if the plans had been changed since the residents had examined them. Mr. Olack stated they had not and since the meeting, SPPCO had contacted those residents and provided them with maps to ensure they knew where the line was located. He said the closest structure was an apartment house located between Bordertown and Reno and it was 265 feet away from the line.

Asked which 64 homes in Vintage Hills or Satellite Hills Subdivisions would be affected by the alternate route, Acting Community Development Director Margaret Powell said the homes most affected are along the last street in the Vintage Hills Subdivision, Calle Myriam, and homes along Satellite Hills Drive and Calle Court. She said there are various widths of additional easement space which would be required for an additional line and some homes would be affected by the EMFs but nothing has been defined as to the exact location of the homes.

Mr. Roulias told Council they did not know how they would handle purchase or condemnation of the homes as they have not done extensive studies on the alternate route. He noted they would have to purchase and demolish any homes located right underneath the line. He pointed out that this was complicated as they get into the effect on property values but all of the studies have indicated that over time there is no impact on property values.

Asked about noise produced by the lines, Mr. Roulias confirmed there is noise, both from the electrical hum as well as from wind effects on the lines. He said that is one of the reasons they establish a corridor as wide as it is. He noted other contributing factors are the type of terrain and the prevailing wind direction.

Mayor Breslow announced this was the time set for the public hearing and asked if there was anyone who wished to speak in favor of or in opposition to this matter.

David Mar, 894 Calle Myriam, speaking in opposition, explained that his home would be affected by the alternate route and it would

6

probably be condemned and sold. He said it had taken him and his wife four years to find something they liked, that they had spent a lot of time and effort in making this an ideal home for them to raise their family and they did not want to go through the strenuous process of looking for another home to fit their needs. He told the Council he felt the line was inappropriate and it would be smarter and more cost efficient to keep the route as it was and not go the alternate route, especially if the line is going to cost an additional $30 million. In answer to a question about visual impaction, Mr. Har said stated the view would be ugly and he probably would not appreciate it but his property was close enough to the line that he won't be allowed to make that choice. He said one of the things he liked about his home was the scenic view and he felt that would obstruct it. He reiterated that he did not want to move.

James W. Stover, 886 Calle Myriam, speaking in opposition, told Council his home was one of those most affected as his back yard was adjacent to the existing power line and it would probably be purchased and destroyed. He said he chose to live in Sparks for two reasons: the right house and the good government. He advised Council when he bought his home he had purchased upgrades worth $20,000 and had spent another $20,000 since then on capital improvements. He said it was not the cost as much as the effort to make his home the way he wanted it. He explained he was retired and on a fixed income, that it had taken him four years to locate the right house and he would not be able to recover the additional $40,000 he had invested. He said he was 63 years old and did not want to spend another 3 or 4 years finding another house, if he could find one as good as the one he has right now.

Tape 3, 0001
Christopher French, 950 Calle Myriam, spoke in opposition, stating his back yard fence is 220 feet from the base of the existing power poles and that the County line is approximately 100 yards from his property. He told Council Mr. Har had expressed some of his concerns but he questioned what would happen if the answer was not to someone's satisfaction and the alternate route is used and they jump across the line 100 yards into the County. He also noted a problem with timely notification to area residents to present comment. He said his concern was in not knowing these matters as well as the financial situation which had been exposed.

Lori Burke, 4850 Mason Road, Reno, spoke in opposition, telling the Council her involvement has superseded the fact the line runs near her home. She advised that she had been involved in fighting the Alturas power line for a year and a half and she has evaluated the power line both in the short-term and the long-term instances. She noted

7

people in Alturas do not want to look at it or live next to it and they are not receiving the power and people in Reno feel the say way. She pointed out that if the line goes through Sun Valley, it will affect low income housing. She said Sun Valley already has a transmission line running through it and it has caused an immense amount of economic damage. She stated there are laws to prohibit running of these types of lines and dumping these kinds of corridors on low income people. She said there is no way that anybody in any urban or any rural residential area should have to try to cope with a 325kv power line, they are too big, too ugly, too dangerous and you don't send your kids out to play underneath the power lines. She advised that these lines are not compatible with this kind of life, they have no interest in pushing it onto anyone but between Sparks and Sun Valley more people would be affected. She said the effects are the same on Alturas, Susanville, Bordertown or other residents located close to the transmission line and they are looking for an alternative compatible to meeting SPPCO's goals. What their plan it doesn't do, she said, is provide some of the long-term benefits that SPPCO is seeking to achieve with the power line.

Asked if any homes would have to be removed in her proposal, Ms. Burke pointed to the map and specified an area where one or two might have to be removed. She pointed out that this kind of power is very desirable to the mining industry and there is a big push to provide big transmission service. She said they would not be looking at the big picture if they think Washington Water Power and SPPCO combined are not going to try to utilize these transmission lines through our area. She advised that this is the way that Sierra Pacific is getting a foot in the door, that they are doing several things that are a compromise to reliability and to concerns about EMFs and they are not using reliable criteria in Sparks.

Asked who she was representing, Mr. Burke clarified she represented Friends of Peavine and NOPE (Neighbors Opposing Power Encroachment) in Alturas, California, and the people in the Bordertown area who are concerned about the substation.

Fran Valentine, 481 Pine Meadows Drive, No. B, and 970 Vintage Hills Drive, spoke in opposition, presenting pictures to the Council of her Vintage Hills home. She expressed concern with notification of the hearing, stating she did not know about it until a few days previous and concern that she not know if the route would have an effect on the property she was purchasing. She said one of the reasons she chose the Vintage Hills lot was because of the beautiful view all the way around, that the purchase was an investment for her and her husband who will be retiring in 3 to 4 years and they did not want to see 345 volts of whatever flying through the air

in such a small community. She advised that a 120 volt power line is rather large and she could not envision something that big and that black going across the sky and carrying that much power, especially in such a small community. She stated she totally objected to this taking place, that big business has a way of getting their way simply because little people either don't know they can be heard or don't take the opportunity to be heard. She told Council it was a bad mistake, that there are just too many alternatives and too much land out there that wouldn't affect communities that are already built. She said the $12 million was not compensation enough to the people as it could not pay for upgrades and improvements. She said for $12 million they could run it underground or just not run it at all.

Lea McMullen, 950 Vintage Hills Boulevard, speaking in opposition, adamantly objecting to the alternate route. She told the Council she and her family have made a large investment of money, blood, sweat, tears and improvements to their home and they did not feel any amount of money could compensate for that investment. She said this is not a tent you put up and take down later and they had no idea when they bought that house that any kind of thing like this would happen, that they are flabbergasted and appalled. She said she would not want her family, friends, neighbors or enemies living under or near something like this and she did not want it in her back yard. Even though my house probably will not be condemned, she said it would be condemned to her because she will not live next to a power line like that, that she feels it is wrong and she objects, adamantly.

Chris Koehler, 1654 Golddust Drive, speaking in opposition, stated he was not sure he was directly affected by this but he knew he was indirectly affected. He said he spent 5 years looking for the house he is now living in and he and his family spent four long grueling months, every day, watching the progress of the house being built. He said they are able to live with the power lines running through there now but this other power line coming in with its new towers and lines is ugly, it is going to affect them and their view and make the neighborhood ugly and possibly reduce property values He stated is was really against the alternate route going through Sparks.

Robert Brown, 926 Calle Myriam, spoke in opposition, stating he had moved from southwest Reno to Sparks and as a new resident he could have chosen to live anywhere in the City but he liked the family atmosphere and Sparks and chose to live in Vintage Hills subdivision. He thanked the Council for bringing this to their attention and the Mayor for attending a meeting no one knew about. He told the Council his home backs up to the existing power line and he was aware of that when he purchased his home but he would not

have purchased the home had he known that additional power lines might go in. He said he was not going to testify but the Council had asked for redundant testimony, he does object to the route and he thanked the Council for bringing it to their attention.

William Eck, 836 Calle Myriam, spoke in opposition, stating he was probably the newest arrival there and he reiterated what had been said. He thanked Council Member Phil Zive for bringing this to their attention and noted that they were all very concerned. He said they all had spent a lot of money and all had looked a long time to find the home they each wanted. He told the Council he backed up to the power line and chose it that way but if the other power line had been there they may not have bought that property. He said they certainly do not want to see another power line there.

Peggy Row, 982 Calle Myriam, spoke in opposition, addressing the noise emitting from the existing power line, stating she could not imagine what noise from a second, larger line might be. She said even though her house might not be affected, she did not want to lose her neighbors. She explained they had bought their property because it is surrounded by County easements and they would not be bumped up against other developments or subdivisions. She noted they had a great community with hardworking people and it would be a real waste to put this kind of ugly addition into Sparks when they have all made such an effort to makes Sparks beautiful and desirable.

Peggy Lear Bowen, 527 Thoma Street, Reno, President of Friends of Rancho San Rafael Park, spoke in opposition, and addressed the quality of life in the Truckee Meadows and the North Valleys. She said they knew this power line had been proposed for several years, that it started east of Sparks and came though the center of Reno and now they have switched to the east side of Peavine and it takes them through Bordertown, Anderson Acres, Raleigh Heights, Horizon Hills and down into what she had hoped to be a new 158+ acre addition to Rancho San Rafael Park. She stated that the line is nothing more than an attempt to raise profits for stockholders, that they are talking about 345,000 volts, and it is not good for anything living. She informed Council she had attended the Susanville public hearing and had made an environmental impact statement for the record. She noted she had been unable to attend the Reno meeting due to surgery and felt the cause, the heart and good of the community as a whole had been lost. She said they need to do this as a community, Reno, Sparks, Truckee Meadows and the North Valleys together or we won't make it at all. She explained that this is a farce and the suggestion that Reno is in great need of power is a joke but that is what they are trying to sell to the powers that be who decide where this line is to go. She said they are using

1983 maps to the neutral observers who were suggesting which power line to follow.

Asked if she had testified before the PSC when the project was approved, Ms. Bowen said she had but it was not a proper public hearing as such in the State of Nevada because California was handling it. She pointed out that Nevada's environmental impact laws have not been put to the test in this.

Ms. Bowen noted the concept had been approved by the commission, not the route. She said she had not participated because they had not bee notified. She said the important thing to note here is we need to tell SPPCO that the line does not have to be 345,0000 volts, it can be broken down, it can be taken across other corridors and it can be taken straight to Tracy without disrupting the people who live in our communities. She commented that SPPCO is looking at its profit margins and what it comes down to is they want to put in a 20-acre power substation at Bordertown to freewheel power across the western United States. The bottom line, she said, is they need to have a community of our size to justify the line in order for the merger between Washington Power and Sierra Pacific Power to go through. She stated that the people who have the biggest increased need for power is not Truckee Meadows, it is the mining communities at Carlin and Elko and that's what got this whole line started. Ms. Bowen reported that the reason the line is coming in our direction is because the people in Susanville made a request that if the merger went through between Washington Water Power and SPPCO, they would like to have some of that cheaper hydroelectric power and their City Council endorsed it.

Ms. Bowen pointed to a conflict in dates for the workshop meeting scheduled for May 22, 1995, noting there is an official court hearing taking place in Susanville that week to decide whether or not this power line is coming or not. She said intervenors are to make presentations and there will be legal testimony in regard to that. She suggested Sparks have representatives there as intervenors to state how this line would impact Nevada, especially as no entity in this whole area has met to say how this will affect our communities environmentally or any other way.

As to the conflict in meetings, Mayor Breslow suggested it would behoove her to contact Washoe County Commission Chairman Jim Shaw, as the Commission had set the May 22nd meeting. Ms. Bowen noted it was important that they work as a team or they were going to have this shoved down our throats. She advised Council that they keep moving the route where the line is to go, depending on who complains the most. In closing Ms. Bowen stated the we all live here because we like the quality of life and that means we do not want the effects of the electromagnetic fields and we do not want that

type of visionary pollution hanging over our parks, towns and communities.

Leeann Stover, 086 Calle Myriam, spoke in opposition, stating she was not as eloquent or well versed, but they have a wonderful home and wonderful neighbors. She said she did not know what the impact would be but there are a lot of children and it was hard enough on the older people to move but it was worse with children. She said she would go back to using candles and kerosene lanterns if that was necessary. She said she could live with the power lines which were present when they bought their property but she could not imagine a Frankenstein tinkertoy. She pleased with the Council to keep it away from Sparks.

Steve Elliott, a resident of Golddust Drive, Satellite Hills Subdivision, stated he had reviewed materials on the alternate route when he was drafting the proposed resolution under consideration. He said it appears that the route has not been thoroughly studied by the power company as they have indicated, but they do know the 345kv line is not going to be placed on top of the existing 125kv line but it would require another line that would parallel the existing line. He pointed out they did not know if the line was going to be on the south side or north side of the line as it passes through Satellite Hills and Vintage Hills. He noted if the line is on the south side it would have the greatest impact on Vintage Hills and Calle Myriam on the north side and the homes would probably be condemned because the power company would have to line their corridor in that area. If the line goes on the north side, Golddust Drive, many homes on that street would probably be condemned to widen the line to the north side. Homes to the immediate north of the corridor in Satellite Hills and the west side of Vista would also have to be condemned. He explained that Golddust Drive sits above Vista and all those homes have views looking across the Truckee Meadows to Mt. Rose and they look across the existing power line now. He advised that their view would be substantially impacted by another huge power line going through there. He also noted the issue of the crackling of the lines, especially during rain or now or lighting and that when you have very high power lines and high humidity, the lines really do make a lot of noise. He said even if the corridor wouldn't be widened to take somebody's home, their impact would visually add to the sound and it would be immense. He said he certainly would hope that the line would go through an area that's not already as highly developed as it is in Satellite Hills and Vintage Hills.

Bob Meyer, 958 Calle Myriam, spoke in opposition, stating he also backed up to the fence line. He noted SPPCO representatives have given them a date to complete the project by the end of 1996 and he wanted to know when this would be resolved. He said he wanted to know if they should continue to improve their

additional 300 feet of setback on each side of the line is needed for the public health and safety of future uses, it should be addressed and justified in Section C.10. PA. 8-11

C.8-61. The EIR/S incorrectly states that the Tuscarora project will pass through the Long Valley area along with the SPPC project, thereby contributing to cumulative impacts. The proposed Tuscarora project leaves Lassen County and California east of Herlong. PA. 8-12

C.9-11. The EIR/S states, "The only known locations where significant construction noise will be generated are the angle points and new access roads..." Staging areas are not identified as significant noise sites, which they undoubtedly will be, especially with the use of helicopters. What will the noise contours be around the staging areas? PA. 8-13

C.9-13. Noise impacts from helicopters are not discussed in Section C.9. More information is needed about helicopter use and flight patterns to consider the need to mitigate noise impacts to residences in Wendel and other areas along the route and near the staging areas. PA 8-14

Part F. In the proposed Mitigation Monitoring Compliance and Reporting Plan, the County is identified or suggested in the EIR/S as a responsible or participating agency for the following mitigation measures:

Measures G-2, G-3, G-4. Review potential of fault displacement collapsing transmission line structures.

Measures G-7, G-8. Review structure designs for landslide/slope instability.

Measure G-10. Review Emergency Preparedness Plan regarding potential impacts of major volcanic eruptions on the project.

Measure G-13. Review designs regarding corrosion of structural steel or concrete from corrosive soils. PA. 8-15

Measure G-14. Review plans and geotechnical reports regarding potential damage to structures from expansive soils.

Measure L-13. As discussed above (Page C.8-49) the EIR/S states the County should establish a 300-foot setback for any future occupied structures along the right-of-way.

Measure L-14. Participate in coordination meetings and memorandums relating to the project and to proposed projects adjacent to or near the transmission line to coordinate construction activities and mitigate

3

cumulative impacts.

Measures N-1, N-2, N-3. Related to noise impacts on sensitive receptors. The County would help monitor complaints.

Measure P-3. Review Fire Prevention and Suppression Plan.

Measures T-1, T-2, T-3, T-4, T-5, T-12. County Sheriff and Road Department to review Transportation Management Plan regarding road blockages, increased accident risks, restricted access for emergency responses. Will also review Emergency Response Plan to address disruptions to roads in case of major accident. PA. 8-15

Measures V-1, V-2, V-3. The County would help monitor construction material storage and cutting of access roads to minimize visual impacts.

Although these mitigation measures refer to County participation, the active role of the County on any formal project mitigation monitoring team is unclear. On the other hand, if the County has no permitting discretion or conditional approval over the project, how will it be compensated for its participation in the mitigation monitoring program for this project?

4

WASHOE COUNTY
"To Protect and To Serve"

DEPARTMENT OF COMPREHENSIVE PLANNING

1001 E. NINTH STREET
POST OFFICE BOX 11130
RENO, NEVADA 89520-0027
PHONE: (702) 328-3600
FAX #: (702) 328-3648

RECEIVED

Public Agency Comment Set 9

April 12, 1995

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

SUBJECT: Sierra Pacific Power Company Alturas Transmission Line Project
Draft Environmental Impact Report/Environmental Impact Statement
CPUC Application No. 93-11-018
U.S. BLM Case # CACA-31406

Dear Ms. Halligan/Mr. Humm:

Washoe County and the City of Reno are jointly sponsoring the design and construction of a flood detention facility in the Evans Creek watershed, which is immediately north of the Ranch San Rafael Regional Park and flows through the University of Nevada, Reno campus and the City of Reno before reaching the Truckee River. The construction of this facility will prevent flood damages in a 100 year flood that are estimated to be over $4,000,000 and therefore is of major importance to the community.

The design and construction of this facility is being performed for the community by the U.S.D.A. Natural Resources Conservation Service. The dam is currently being designed as an earth filled structure (rolled concrete is being investigated as an alternative) and the nearest borrow site for the clay core of the earth filled structure is located on Washoe County Assessor Parcel No. 003-020-10, which is designated as segment X, MP-163 in the DEIR/EIS.

PA. 9-1

This property is owned by the Federal Government and is under the jurisdiction of the U.S. Forest Service. Washoe County and the City of Reno, through the Washoe County Parks Department, has initiated the process of trading for the U.S. Forest Service property, with the intent of removing the necessary clay material for the dam, reclaiming the borrow site and haul road to the dam site, and then incorporating the property into the Rancho San Rafael Regional Park.

The value of this property in terms of inclusion into the Ranch San Rafael Regional Park is dictated by its open vistas and solitude for hiking and bike riding purposes. Adding an additional power line through the property would be intrusive, and could jeopardize the parks department's desire for the property. For this reason, Washoe County would strongly suggest that appropriate mitigation for construction of this power line should include the placing of the existing powerlines underground through this last segment.

Thank you for the opportunity to comment on this project, and if there are any questions, or further information needed, please do not hesitate to call my office (702-328-3631)

Sincerely,

Leonard E. Crowe, Jr.
Acting Flood Control Manager

cc: Evans Creek (Block N) Steering Committee
Washoe County Parks Department

WASHOE COUNTY IS AN EQUAL OPPORTUNITY EMPLOYER

WASHOE COUNTY

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1001 E. NINTH STREET
POST OFFICE BOX 11130
RENO, NEVADA 89520-0027
PHONE: (702) 328-3600
FAX #: (702) 328-3648

DEPARTMENT OF COMPREHENSIVE PLANNING

April 21, 1995

Julie Halligan, CPUC/Peter Humm, BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Subject: CPUC Application # (93-11-018) BLM Case # (CACA-31408)

Dear Ms. Halligan/Mr. Humm:

This letter contains comments on the Draft Environmental Impact Report/Statement (DEIR/S) for the proposed Alturas Transmission Line Project. My position is Open Space Planner with the Washoe County Department of Comprehensive Planning. I am the staff member that stewards the Washoe County Regional Open Space Plan and my comments on the proposed project are made in this capacity. The Department of Comprehensive Planning was made aware of the proposed project early in this process. At that time, I reviewed the information available and the list of issues and concerns that were to be covered in the forthcoming DEIR/S. I felt that this list was comprehensive enough to address the questions and concerns that the Department of Comprehensive Planning would have with the proposed project. Your offices have not received any previous comments from me because I felt it was appropriate to wait until the DEIR/S was released enabling me to utilize this information in performing a complete review.

BACKGROUND

The Washoe County Regional Open Space Program is a cooperative effort between the three local governments of Reno, Sparks and Washoe County to preserve our area's abundant natural, cultural, recreational and scenic resources. A Regional Open Space Plan (ROSP), adopted in 1994, depicts the areas in the southern portion of the County where these valuable resources are located. The ROSP outlines the different methods available for protecting the desired resources when they are located on private land and describes the steps that should be taken to coordinate with federal land management agencies such as the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS) for protection of the desired resources on public lands.

A public funding source that will allow for implementation of the ROSP does not exist. Given the existing political and economic realities of our community, a ballot issue to publicly fund open space acquisition has a questionable chance of succeeding. The absence of a dedicated funding source for the acquisition of private land places an added emphasis on retaining the integrity of the natural resources found on the existing public lands in southern Washoe County, such as Peavine Mountain. **Existing public lands could very well end up comprising the majority of our community's open space system for the future. Peavine Mountain is a very important piece of this system for many reasons.**

PEAVINE MOUNTAIN'S NATURAL RESOURCES

Proposed transmission line routes (X & Y) from Bordertown (CA-NV border) to the City of Reno, lying along the Northern and Eastern flanks of Peavine Mountain, are located on land designated as open space in the ROSP. The reason for Peavine Mountain being designated as open space is due to the existence of a number of significant natural resources, such as:

- Potential wetlands
- Streams and riparian corridors
- Sensitive species habitat (Webber's Ivesia)
- Significant wildlife habitat and migration corridors (mule deer, black bear & mountain lion)
- Visually important ridgelines, canyons, hills and mountains

The mapping of natural resources, prepared for the ROSP, was used in analyzing the impacts of the proposed transmission line route in Washoe County. The proposed route crosses a total of 17 "Intermittent Streams of Regional Significance" (see enclosure 1). The proposed route crosses a total of 7 separate ridgelines and 11 individual canyons (see enclosure 2). The proposed route crosses a total of 3 proposed multi-use recreational trails; 1 heavily used existing trail (Keystone Canyon); and a proposed future trail head facility above the Horizon Hills area (see enclosure 3). PA. 9-2

Potential impacts on stream channels and their associated riparian habitat, sensitive species habitat, wetland areas and significant wildlife habitat may possibly be avoided with careful planning and placement of tower structures and access roads along the proposed route. The natural resource category listed above, that could not be effectively protected or mitigated, is: "Visually important ridgelines, canyons, hills and mountains". Visual degradation would occur on the ridgelines and above the canyons of the Northern flank of Peavine Mountain if the project is approved.

RECREATIONAL IMPACTS

The proposed project is not compatible with the recreational land use found in the northern portion of Rancho San Rafael Regional Park and the adjacent Keystone Canyon area. Rancho San Rafael boundaries are not properly recognized in the DEIR/S and the proposed projects impacts on the park are not adequately addressed. Construction of a major power transmission corridor through Rancho San Rafael Park could set a precedent for other existing and future parks and for preservation of open space. As referred to earlier in this letter, the proposed project corridor could also negatively impact future recreational trail use on Peavine and a proposed trailhead facility in the Horizon Hills area. PA. 9-3

NORTH VALLEYS AREA PLAN

Section C.8 (page 19-20) of the DEIR/S lists and gives a brief description of the different Washoe County documents that are pertinent to the transmission line project. The North Valleys Area Plan is a part of the Washoe County Comprehensive Plan and specifically addresses the area where the transmission line project is proposed. The DEIR/S does not adequately address the emphasis that is placed on the preservation of natural resources and visual qualities of Peavine Mountain by the North Valleys Area Plan. These policies (see enclosure 4) impart a sense of just how important a natural feature Peavine Mountain is to the citizens of the North Valleys and should be included in the text of the DEIR/S. PA. 9-4

Proposed Alturas Intertie Project
April 21, 1995
Page 3

The North Valleys Area Plan also includes Policy NV.2.1 (see enclosure 4) directing Washoe County to work with the appropriate agencies to develop a land use management plan for Peavine Mountain. The alignment of the proposed project falls within the designated boundary for the management plan. Although the management plan has not been completed, this policy deserves to be included in the DEIR/S to underscore the importance of Peavine Mountain as a natural feature to the citizens living in the North Valleys.

As stated in section C (pages 13-43) of the DEIR/S, the portion of U.S. 395 from Cold Springs to Panther Valley is designated as a scenic corridor. The undisturbed condition of Peavine Mountain is certainly a major component of this scenic designation, and major power transmission lines are, typically, not considered compatible with such corridors. PA. 9-4

CONCLUSION

The adoption of the Washoe County Regional Open Space Plan makes it very clear that the public lands surrounding the urbanizing portion of southern Washoe County have taken on added importance. The preservation of the natural resources on these public lands is formally recognized as being an extremely important component in maintaining our areas quality of life. For the reasons stated in this review, Washoe County would strongly suggest that appropriate mitigation for construction of this power transmission line should include the under grounding of all existing power lines (segments X and Y) that either parallel or intersect the proposed project. PA. 9-5

Thank you for the opportunity to comment on this proposed project. If there are any questions, or further information needed, please do not hesitate to contact me at (702) 328-3617.

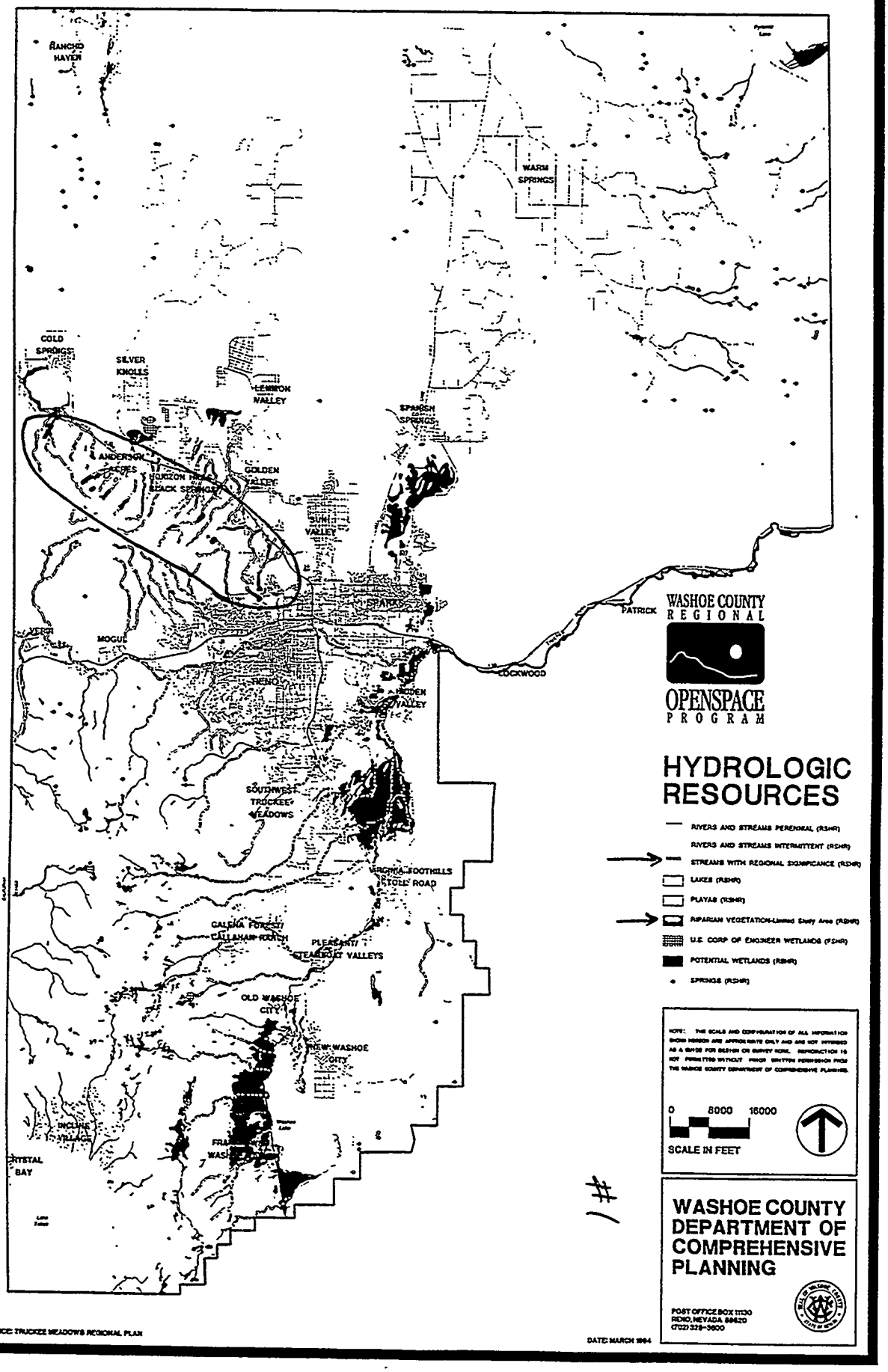
Sincerely,

Bill Whitney

Bill Whitney
Open Space Planner

WHW

cc: Joanne Bond, County Commissioner
Bill Van Bruggen, U.S. Forest Service
505-08.01



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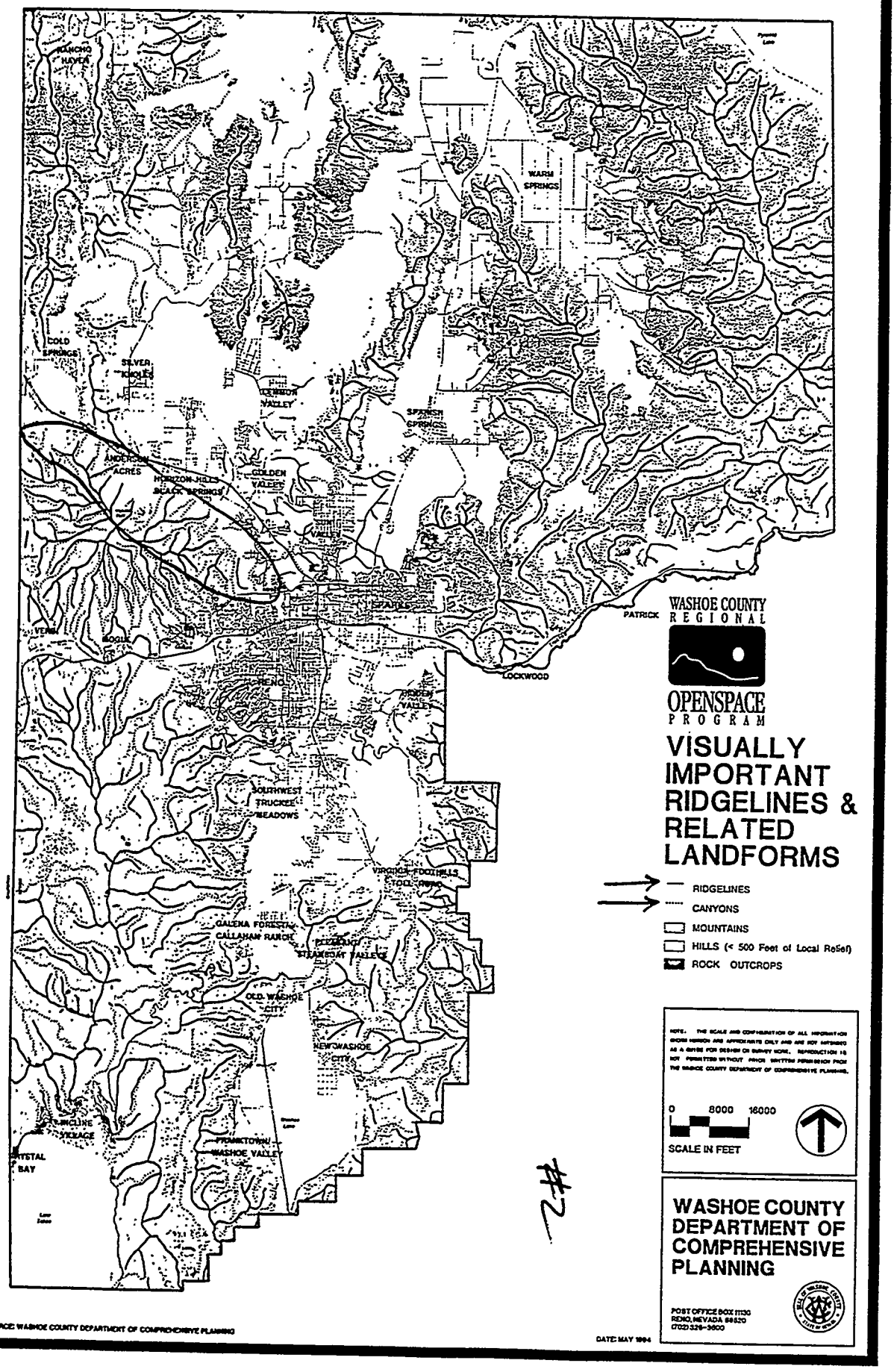
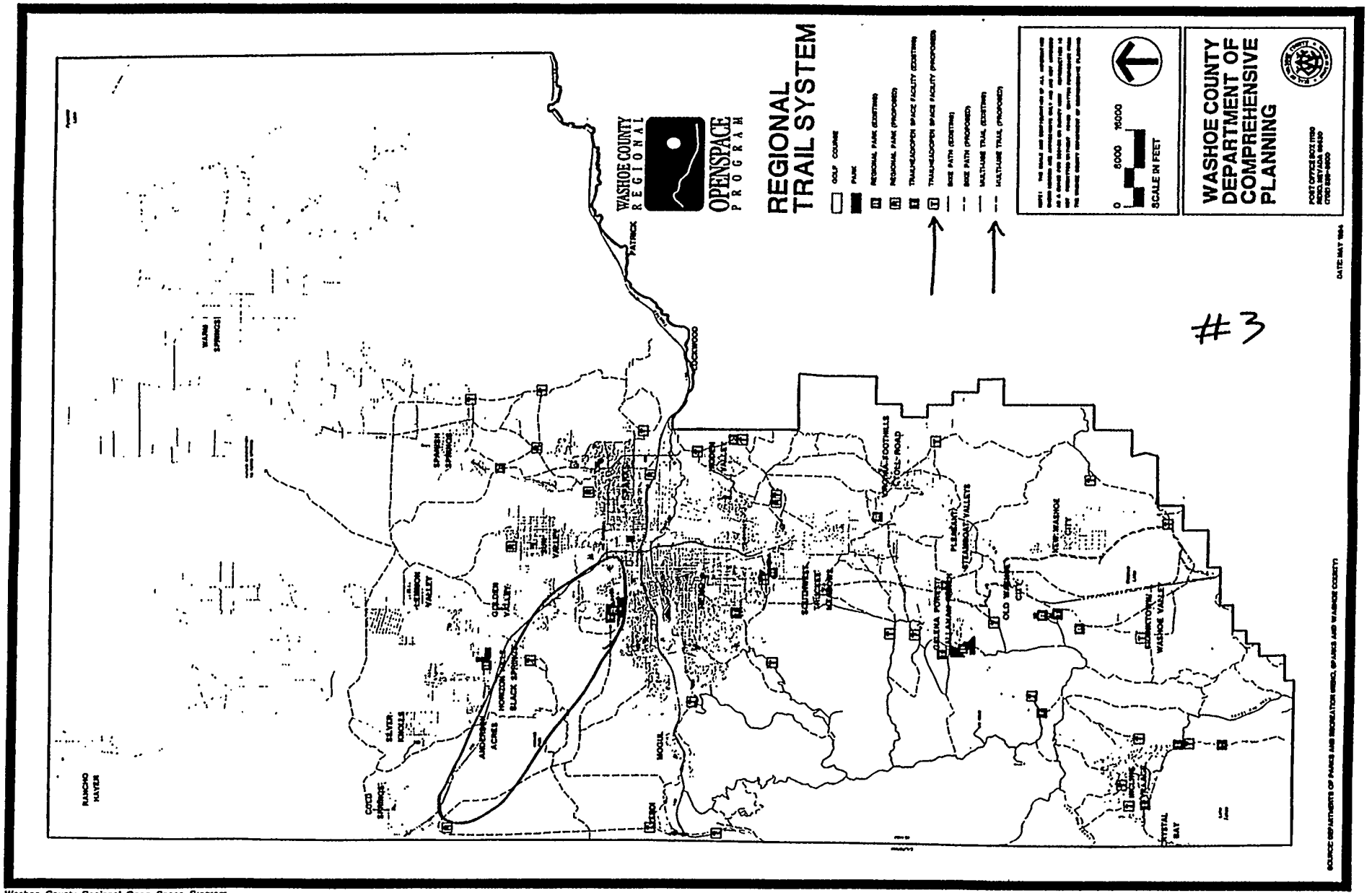
PART G. COMMENTS


WASHOE COUNTY
REGIONAL
OPENSPACE
PROGRAM
VISUALLY IMPORTANT RIDGELINES & RELATED LANDFORMS
RIDGELINES
CANYONS
MOUNTAINS
HILLS (< 500 Feet of Local Relief)
ROCK OUTCROPS
0 8000 16000
SCALE IN FEET
WASHOE COUNTY DEPARTMENT OF COMPREHENSIVE PLANNING
POST OFFICE BOX 11130
RENO, NEVADA 89520
(702) 328-3600
SOURCE: WASHOE COUNTY DEPARTMENT OF COMPREHENSIVE PLANNING
DATE: MAY 1994
RANCHO HAVEN
COLD SPRINGS
SILVER KNOLLS
LEMMON VALLEY
WARM SPRINGS
SPANISH SPRINGS
ANDERSON ACRES
HORIZON HILLS
BLACK SPRINGS
GOLDEN VALLEY
NORTH VALLEY
SPARKS
PATRICK
LOCKWOOD
VERDI
MOGUL
RENO
PROCTOR VALLEY
SOUTHWEST TRUCKEE MEADOWS
VIRGINIA FOOTHILLS
GALENA FORESTA
CALLAHAN RANCH
PEAVINE
STEAMBOAT VALLEY
OLD WASHOE CITY
NEW WASHOE CITY
INCLINE VILLAGE
CRYSTAL BAY
PLUMB TOWN
WASHOE VALLEY
#2


WASHOE COUNTY
REGIONAL
OPENSPACE
PROGRAM
REGIONAL
TRAIL SYSTEM
GOLF COURSE
PARK
REGIONAL PARK (EXISTING)
REGIONAL PARK (PROPOSED)
TRAIL/LOOPER SPACE FACILITY (EXISTING)
TRAIL/LOOPER SPACE FACILITY (PROPOSED)
BIKE PATH (EXISTING)
BIKE PATH (PROPOSED)
MULTI-USE TRAIL (EXISTING)
MULTI-USE TRAIL (PROPOSED)
0 8000 16000
SCALE IN FEET
WASHOE COUNTY
DEPARTMENT OF
COMPREHENSIVE
PLANNING
#3
DATE: MAY 1994

4

Development must be done in a manner that protects the water resources of the area from siltation and pollution; does not increase erosion, flooding and other surface water damage; and preserves and enhances the area's water resources

FLOOD HAZARDS

The Federal Emergency Management Agency (FEMA) has indicated the 100-year floodplains in the planning area. The potential for localized flooding caused by winter rains or summer cloudbursts is high in the North Valleys planning area, especially in the drainages of Peavine Mountain.

Areas prone to this type of flooding include lands bordering the mouths of canyons, intermittent stream channels, alluvial fans and playas. Proper mitigation of the hazards of both the 100-year floodplains and that of flash flooding must be provided for in all development proposals.

The floodplains of Silver Lake and Swan Lake are within the jurisdictions of both Reno and Washoe County. Regulation of development within these areas must be coordinated between the two jurisdictions.

WETLANDS

The U.S. Army Corps of Engineers and the U.S. Fish and Wildlife Department have separately issued a series of generalized wetland maps. These maps are for use as guides for planning purposes only and were used in preparing the Development Suitability map. The potential wetland areas shown on the Development Suitability map were identified by the federal agencies from aerial photographs, soil surveys, and other data. Only limited areas were field checked due to lack of access. There are some areas of non-wetlands within the wetland boundary. Therefore, the Development Suitability map should be used as a guide only in determining the presence of wetlands regulated by the U.S. Army Corps of Engineers. Anyone planning to conduct any earth moving activities in or near the areas identified as potential wetlands should contact the U.S. Army Corps of Engineers for information on the permitting process.

POLICIES AND ACTION PROGRAMS

CULTURAL AND SCENIC RESOURCES

NV.1.1 **ENSURE THAT THE SCENIC QUALITIES OF THE MOUNTAINS AND HILLS IN THE NORTH VALLEYS PLANNING AREA ARE MAINTAINED**

- NV.1.1.1 Development on hillsides shall disturb the smallest area possible. Disturbed soils should be re-vegetated as soon as is practical. Drought tolerant/fire resistant species should be used where appropriate.
- NV.1.1.2 During development review, preference will be given to proposals that minimize hillside development or otherwise conserve steep slopes.
- NV.1.1.3 Apply County-adopted techniques such as transferable development rights as described in Policy LUT.1.18 to development on the upper slopes of Peavine, Fred's and Peterson Mountains.

NV.1.2 **PRESERVE AND ENHANCE THE VISUAL QUALITIES OF THE NORTH VALLEYS PLANNING AREA AS VIEWED FROM U.S. 395.**

- NV.1.2.1 The Washoe County Department of Comprehensive Planning shall investigate creating scenic corridor guidelines in the proposed Development Code. These should apply to the segment of U.S. 395 within the planning area.
- NV.1.2.2 Proposed developments shall be reviewed to ensure the view from U.S. 395 is preserved. Height limitations and setbacks will help preserve the visually prominent ridges and escarpments.

LAND RESOURCES

NV.2.1 **DESIGNATE PEAVINE MOUNTAIN AND ITS ENVIRONS AS GENERAL RURAL IN ORDER TO PROTECT ITS WATERSHED, SCENIC AND LIMITED RECREATIONAL QUALITIES.**

- NV.2.1.1 Washoe County should work with the appropriate government agencies and private parties to develop a land use management plan for Peavine Mountain.
- NV.2.1.2 Changes in the type or intensity of land uses in areas designated as general rural for Peavine Mountain should be deferred until the completion of the management plan for Peavine Mountain.

NV.2.2 **PROTECT THE AIR QUALITY RESOURCES OF THE NORTH VALLEYS PLANNING AREA.**

- NV.2.2.1 Establish monitoring stations throughout the North Valleys planning area in order to characterize the area's existing air quality.
- NV.2.2.2 The Air Quality Task Force should develop an air quality implementation plan for the North Valleys planning area.
- NV.2.2.3 Building and site designs shall promote the use of solar energy and general energy efficiency.

NV.2.3 **PROTECT THE NATURAL RESOURCES OF THE NORTH VALLEYS PLANNING AREA.**

- NV.2.3.1 During development review of all use permits, Washoe County will require applicants to adequately address visual, natural resource, socioeconomic, and land use compatibility issues.
- NV.2.3.2 The appropriate state agencies will be given the opportunity to review and comment on all proposed development projects, including special use permits, in the area.

NV.2.4 **RESTRICT DEVELOPMENTS IN LAND AREAS THAT PRESENT GEOLOGIC HAZARDS AND WHICH SERVE HIGHLY VALUABLE ECOLOGIC FUNCTIONS.**

- NV.2.4.1 Identify fault lines and debris flow areas on all subdivision maps which pose a threat to the public safety.
- NV.2.4.2 Washoe County will ensure maximum protection for areas of significant environmental concern by discouraging degrading activities within or adjacent to such areas.

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

May 3, 1995

Public Agency Comment Set 14

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, California 91301

Refer to CPUC Application No. 93-11-018,
BLM Application No. CACA-31406.

Dear Ms. Halligan and Mr. Humm:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the project entitled **Sierra Pacific Power Company Alturas Transmission Line Project.** Our review is provided 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.

The Bureau of Land management (BLM), in collaboration with the California Public Utilities Commission (CPUC), has prepared a Draft EIR/EIS to evaluate the impacts of the 345 kilovolt (kV) transmission line project proposed by the Sierra Pacific Power Company (SPPCo). The proposed action would include construction, operation and maintenance of the transmission line and support structures along 164 miles of Federal-, State- and privately-owned lands. The project would extend from the vicinity of Alturas, California through Modoc, Lassen, and Sierra Counties, California, through Washoe County, Nevada to the vicinity of Reno, Nevada. The proposed project would also include the construction of two new electrical substations and the expansion of SPPCo's existing North Valley Road Substation. The project is proposed to supplement an existing shortfall in transmission capacity for wholesale customers and to accommodate anticipated growth in the Reno area.

The transmission line would be suspended from 730 70- to 130-foot-high structures spaced at approximately 1,200-foot intervals. The proposed project right-of-way would be approximately 3,200 acres, not including substations, construction access roads and staging areas.

Printed on Recycled Paper

The alternatives fully analyzed in the Draft EIR/EIS include the proposed project alternative, an environmentally superior alternative, alternative route alignments and substation sites, transmission line alternatives, and a no project alternative. Under the No Project Alternative, the Alturas Transmission Line Project would not be built, leaving the SPPCo with an inability to meet current peak and future baseline power demand in the Reno/Lake Tower area.

We commend the BLM for preparing a generally thorough and well-organized document. While the analysis does contain an informative broad-based discussion of the proposed action, certain issues should be discussed in greater detail and in some instances additional information should be provided in the Final EIR/EIS. For example, we would like to see additional discussion of air quality conformity, biological resources, and project description information. Our detailed comments are enclosed.

Based upon our review, we have classified this Draft EIR/EIS as category EC-2, Environmental Concerns - Insufficient Information (see attached *Summary of the EPA Rating System*). This rating reflects our conclusion that the Final EIR/EIS should contain additional information, as noted. We would be pleased to discuss our comments with you.

We appreciate the opportunity to comment on the proposed project and request that three copies of the Final EIR/EIS be sent to the attention of David Farrel (E-3) at the letterhead address at the same time it is filed with our Washington, D.C. office. If you have any questions or wish to discuss any aspect of our comments, please contact me at (415) 744-1584 or have your staff contact Jeff Philliber at (415) 744-1570.

Sincerely,

David J. Farrel, Acting Chief
Office of Federal Activities

Enclosures: (2)

Attachment A: EPA Rating System (1 page)
Attachment B: EPA EIR/EIS Comments (3 pages)

2149SPPC.DS.JP

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

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 environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (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 analyzed 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 analyzed in the draft EIS, which should be analyzed 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."

EPA DEIS COMMENTS, ALTURAS TRANSMISSION LINE PROJECT, MAY 3, 1995.

AIR QUALITY COMMENTS

1. Page C.2-15L: The Draft EIR/EIS analysis of air quality impacts does not include a discussion of project conformity to applicable State Implementation plans in California and Nevada. The Final EIR/EIS should include this information as well as significance criteria that account for conformity requirements. PA. 14-1

Pursuant to the requirements of Section 176(c) of the Clean Air Act, 42 U.S.C. Section 7506(c), Federal agencies are prohibited from engaging in or supporting in any way an action or activity that does not conform to an applicable State implementation plan. Conformity to an implementation plan means conformity to an implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards. EPA has promulgated regulations at 58 Federal Register 63214 (November 30, 1993) implementing Section 176(c). Among other things, these regulations establish de minimis levels determinations, exempt certain actions from conformity determinations, and create criteria and procedures that Federal agencies must follow for actions required to have conformity determinations. If you have any further questions regarding these or other conformity requirements please contact Bob Pallarino in our Air and Toxics Division at (415) 744-1212. PA. 14-2

BIOLOGICAL RESOURCES COMMENTS

1. Page C.3-49: EPA is concerned about the potential for the proposed action to divide or disrupt wildlife populations, migratory patterns or, cumulatively, ecosystems. For example, although the Draft EIR/EIS describes impacts and mitigation measures to compensate for aggregate loss of mule deer and pronghorn antelope habitat, the Final EIR/EIS should include analysis of the affect of the project on the long-term migratory patterns of those species. PA. 14-3

2. Page C.3-90. The Draft EIR/EIS reports that wetlands would be affected by the proposed project. It is the EPA's position that wetlands are a scarce and valuable resource. As approximately 90 percent of such habitat has been lost in California, every effort should be taken to ensure that remaining wetlands are retained. Executive Order 11990, Section 1(a) requires BLM to take action to minimize the destruction, loss, and degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands. The Final EIR/EIS should include language to ensure that the proposed project will conform to EO 11990 in that all practicable measures shall be taken to preserve wetlands in the course of project construction and operation. PA. 14-4

1

EPA DEIS COMMENTS, ALTURAS TRANSMISSION LINE PROJECT, MAY 3, 1995.

3. Page C.3-98: The Draft EIR/EIS should contain a brief description of "perch guards" and how they work. PA. 14-5

CULTURAL RESOURCES COMMENTS

1. Page C.4-35: Mitigation measures for Cultural Resources should include a provision stipulating that, if archaeological or cultural resources are discovered during excavation or clearing activities on any portion of the site, all construction will cease in that area until a qualified archaeologist is consulted. PA. 14-6

NEPA COMMENTS

1. C-11.31: In keeping with the Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (EO 12898), the Draft EIR/EIS should describe the measures taken by the BLM to: 1) fully analyze the environmental effects of the proposed Federal action on minority communities and low-income populations, and 2) present opportunities for affected communities to provide input into the NEPA process. The intent and requirements of EO 12898 are illustrated in the President's February 11, 1994 Memorandum for the Heads of all departments and Agencies. The Final EIR/EIS should include reference to the Order and a discussion of potential impacts to minority and low-income communities. PA. 14-7

3. Mitigation is usually required to reduce or eliminate adverse environmental impacts. These measures would then provide the basis for specific commitments carried forward to the Record of Decision (ROD). We believe the order of preference for mitigation should be: avoid, minimize, rectify, and compensate. This guidance should be an integral part of the project planning process. PA. 14-8

4. The Final EIR/EIS should include a discussion of pollution prevention, energy conservation, and waste minimization opportunities related to the proposed project's construction and operation. EPA's position is that such opportunities should be integrated into the analysis as part of the physical and economic aspects of the proposed action. PA. 14-9

PROJECT DESCRIPTION COMMENTS

1. Page B-4: The Draft EIR/EIS reports that the proposed right-of-way (ROW) for the 164-mile long project would have an area of 3,200 acres. The Final EIR/EIS should include the total area that would be affected (both short-term and long-term affects) by construction and operation of the proposed project. PA. 14-10

2

EPA DEIS COMMENTS, ALTURAS TRANSMISSION LINE PROJECT, MAY 3, 1995.

2. Page A-1: If available, the Final EIR/EIS should include comparative cost estimates for the proposed project and alternatives. PA. 14-11

3

WASHOE COUNTY SCHOOL DISTRICT

Tom Cates Outdoor Education Coordinator 14101 Old Virginia Road Reno, Nevada 89511 (702) 851-5640

RECEIVED MAY 26 1995

April 12, 1995

Public Agency Comment Set 15

To Whom it may concern;

Each year I take approximately 350 students on field trips to the Border Town area. We use Forest Service land on the road to Dog Valley. We have been teaching wilderness survival to Washoe County students for the past 15 years. Our Border Town site is very important to our program and we would really appreciate it if this could be left as close to natural wilderness as possible. Thank you for your consideration. PA. 15-1

Sincerely,

Thomas G. Cates

Thomas G. Cates
Program Coordinator

MODOC COUNTY PLANNING DEPARTMENT
202 WEST 4th STREET
Phone: (916) 233-6406
ALTURAS, CALIFORNIA 96101

RECEIVED MAY 26 1995

May 23, 1995

Julie Halligan / Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, Ca 91301

Public Agency Comment Set 16

Modoc County has completed review of the draft environmental document for the Sierra Pacific electric transmission line; CPUC application number 93-11-018 and BLM application number CACA-31406. Comments and questions that have arisen from review of the draft are as follows:

STAFF COMMENTS IN GENERAL

1. Inconsistencies occur in the document regarding the percentages of federal and private lands the line crosses (executive summary p44 and land use section C.8-1). PA. 16-1

2. The project does not address future abandonment. This should include the removal of poles, and abandonment of roads and revegetation. PA. 16-2

3. Page ES-13 the route alignment section states a preference for "Segment A, due to the fact that this route would avoid many of the visual and land use impacts associated with Alternative Segment B that cannot be mitigated." We feel Segment A will visually skyline the ridge and span the valley for a greater distance than Alternative B, thus creating visual impacts for a greater number of residents and motorists. Segment B, due to its' proximity to the golf course and residential uses will create greater land use impacts. It is our opinion that Segment A has greater visual impacts than Alternative B, but less land use impacts. PA. 16-3

4. Page C.8.49 mitigation number L-13 suggests the county impose an additional setback from the power line. A 300' setback from the power line may be appropriate, however, it is inappropriate for (1) the county to meet the mitigation requirements of this project; (2) not compensate the property owner for the additional loss of use in and above the original right of way purchase. If additional setbacks are necessary to secure public safety, the land owner should be compensated. PA. 16-4

5. Page C.715, H-7 states: "Blasting in hard bedrock may affect local aquifer permeabilities, potentially decreasing or increasing flow to nearby springs or wells." We need a contingency plan in the event damage is done to a water source. This might include compensation to a property owner or federal permittee and/or remedying the situation. PA. 16-5

6. Page C.8-31, the last six lines of the last paragraph indicate that visual impacts would be significant. However, this conflicts with the visual study. PA. 16-6

7. Page C.8-51 states that "constructing and operating Alternative Segment B would also impact recreational use of the Arrowhead Golf Course, owned and operated by Modoc County. " Arrowhead Golf Course is owned and operated by the City of Alturas and not the County of Modoc. In addition, it is located within the city limits. If this alternative is chosen, residentially zoned land adjacent to the southern boundary of the golf course would be rendered useless for housing. A suitable mitigation would include purchase of this property and deeding it to the City for a Golf Course driving range. PA. 16-7

8. Section number C.11.1.4.5 ; "The City has no need for expansion of its wastewater system in the foreseeable future." Although the system is not currently operating at capacity, all available capacity is necessary to service the existing vacant lands. In addition, the plant is antiquated and the service lines need replacement. PA. 16-8

PLANNING DEPARTMENT

Currently housing in both the city and the county are at equilibrium with only about 10 units available. However, it appears there is an adequate number of motel rooms and R.V. sites available to accommodate an estimated 40 workers in the area.
Available R.V. spaces as listed. PA. 16-9

Belly Acres (Canby) 10	Nifty (Alturas) 10	Shady Vale (Alturas) 1
City Center (Alturas)3	Sully's (Alturas) 3	KOA (Alturas) 57
Cedarville Fair Grounds 30	Sunrise (Cedarville) 12	Laundry R.V. (Cedarville) 10
Most Likely (Likely) 15	Hamel (Likely) 22	

The Division of Fish and Game is requesting habitat and wetland mitigations that include the transfers of private land to state and federal agencies. Modoc County requests disclosure of the properties targeted for transfers or purchases for such purposes. We request the economic impacts of such purchases be analyzed with regard to the tax base, employment, and as a loss of export dollars to the county. We further request that the impacts be examined not as an isolated event or at a limited point in time, but as a cumulative effect viewed both historic and projected. Be aware that Modoc County has a no net loss policy. Purchases of land, either directly by an agency or indirecly by a third party, for use by a state and federal government is subject to review by the Modoc Federal Lands Commission. PA. 16-10

The greatest controversy occurs in Segments A01 through C01 on the preferred route and B01 through C01 on the alternative route. The issues within these segments are related to visual and wildlife concerns as the project skylines the ridges and spans the valleys that lie between these segments. Possible Mitigations to these impacts include: PA. 16-11

Where the power line can be seen from Highway 299, 395 and County Road 53, helicopter placement of structures will minimize the visuals created by the tree trimming and earth disturbing activities related to road construction. Lowering tower heights will reduce the effect of skylining. Relocating structures that parallel the rim will also reduce the amount of skylining. In addition, further study of an alternate route that spans less of the valley would also reduce wildlife impacts and visuals. PA. 16-11

The installation of fiber optics could greatly enhance the economic marketability of the county and the city, as well as, making the latest technology available to residents. This issue is very important to the City and the County, therefore, we request a point of presence be placed at the closest and most accessible location to Citizens Utilities switching station. PA. 16-12

AGRICULTURE

1. Seeds used in reclamation must be certified.
2. We request a copy of the botanical study to correlate with future weed control programs.
3. Responsibility and arrangements for future noxious weed control needs to be correlated with the County Agricultural Commissioner.

PA. 16-13

AIR QUALITY

1. Air quality permits may be required depending on the type of equipment used and the amount of fugitive dust emissions. Permits may be obtained through the County Agricultural Commissioner.
2. Watering of dirt roads may be required.

PA. 16-14

ASSESSOR

The County of Modoc would like to receive the maximum benefit from the allocation or reallocation of sales and use tax dollars. This may require the contractor to use various approaches provided for in the taxation code. Such as, but not limited to, requiring contractors to obtain sub-permits for taxation at the job site. We request Sierra Pacific Power do a thorough review of various approaches provided for in the Taxation Code and employ an approach or combination of approaches that will result in the greatest allocation of tax dollars to Modoc County. PA. 16-15

Please contact the Planning Department for questions or comments regarding these issues. Thank you for your assistance.

Sincerely,

Scott Kessler
Planning Director

encl: resolutions

RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF MODOC

ADOPTION OF MODOC PLANNING COMMISSION RESOLUTION NO. 95-06 AND REQUEST AND ADOPTION OF MITIGATING PROPOSALS

RESOLUTION NO. 95-35

WHEREAS, Sierra Pacific Power has submitted a request for review of the Alturas inter-tie transmission line; and,

WHEREAS, lawful and due notice of the Planning Commission meeting was given by publication in the Modoc County Record and by posting in public places; and,

WHEREAS, the Planning Commission after due and careful consideration of the facts and substantial public testimony presented in connection with the request, and its effects on the health, safety and welfare of the community, adopted Planning Commission Resolution 95-06; and,

WHEREAS, this Board after due and careful consideration of all of the above, together with the comments and discussion at the regularly scheduled public hearing with regard to the above on May 2, 1995; and,

WHEREAS, the Board finds good cause therefore;

NOW THEREFORE, BE IT RESOLVED, that the Modoc County Board of Supervisors supports Planning Commission Resolution 95-06 and supports the comments made by County staff.

BE IT FURTHER RESOLVED, that the Modoc County Board of Supervisors feels that the project has little benefit to the county and that the county is bearing cumulative environmental impacts along the full length of the corridor for the service and convenience of other regions. Therefore, the Board believes that the suitable mitigation to the project should include all of the following: PA. 16-16

1

1. PREFERRED ROUTE:

A. In order to reduce the visual skylining effects, preferred route Sections A01 through A03 need to be moved North 300 feet and the height of the towers reduced to eighty (80) feet;

B. Sections A03 through A05 need to be buried;

2. ALTERNATE ROUTE:

A. Sections B01 through BMP3 need to be buried.

PA. 16-16

3. In order to further mitigate the impact of the project to this county and to allow the county economic benefit from the project the installation of fiber-optics telephone service to the Citizen Utilities Switching Station in the City of Alturas, should be included in the project.

PA. 16-17

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of the County of Modoc held on this 16th day of May, 1995, by the following vote:

AYES: 3

NOES: 0

ABSENT: 2

BOARD OF SUPERVISORS OF THE COUNTY OF MODOC

BY: _____
RONALD McINTRYE, Chairman

ATTEST:

MAXINE MADISON, County Clerk
and Ex-Officio Clerk of the Board

STATE OF CALIFORNIA
COUNTY OF MODOC. SS

I, MAXINE MADISON, MODOC COUNTY CLERK DO HEREBY CERTIFY THAT THIS IS A FULL, TRUE AND CORRECT COPY OF THE ORIGINAL DOCUMENT ON FILE IN MY OFFICE.
WITNESS MY HAND AND OFFICIAL SEAL THIS 23 DAY OF May, 19 95
MAXINE MADISON, COUNTY CLERK
BY _____

MODOC COUNTY PLANNING COMMISSION
RESOLUTION 95-06

WHEREAS, Sierra Pacific Power has submitted a request for review of the Alturas inter-tie power transmission line, and;

WHEREAS, lawful and due notice of the meeting was given by publication in the Modoc County Record and by posting in public places, and;

WHEREAS, the Planning Commission after due and careful consideration of the facts and substantial public testimony presented in connection with the request, and its effects on the health, safety and welfare of the community, find the following:

1) The Draft Environmental Impact Statement fails to comply with the following issues in the Modoc County General Plan:
   a) Segment A01 and Alternate Segment B01 fail to protect critical wildlife and wildlife habitat.
   b) Segment A01 and Alternate Segment B01 fail to protect critical views open to the public and of great value to the public.

PA. 16-18

2) Although we recognize economic benefit, we urge you to reject both Segment A and Alternate B as proposed routes.

PA. 16-19

3) The Planning Commission supports the review and comments as put forth by the Modoc County Planning Department and Modoc County Road Department.

THEREFORE BE IT RESOLVED, that the Modoc County Planning Commission adopts resolution 95-06 and recommends to the Board of Supervisors the Planning Commission Resolution 95-06.

On the motion of Commissioner Madison, and seconded by Commissioner Hamel, the above and foregoing Resolution was passed and adopted by the Modoc County Planning Commission on the fourteenth day of April, 1995 by the following vote, to wit:

AYES: 5

NOES: 0

ABSENT: 0

ABSTAIN: 0

Joseph Tolbert, Chairman
Modoc County Planning Commission

Patricia A. Clark, Secretary
Modoc County Planning Commission

2

Department of Energy
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Public Agency Comment Set 17

May 25, 1995

Julie Halligan
Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Dear Ms. Halligan and Mr. Humm:

We have reviewed the Alturas Transmission Line Draft Environmental Impact Report/Statement (DEIR/S), CPUC Application Number 93-11-018, BLM Case Number CACA -31406. The comments pertain to Bonneville Power Administration's (BPA) portion of the transmission interconnection and the communications interconnection. The rest of the comments are general and represent BPA input. Consolidated comments are included below:

ES-2, last Paragraph (¶).	Insert *Except for the first two miles, the proposed transmission.....*	PA. 17-1
ES-2, last ¶.	Insert behind second sentence *The first two miles would have 85 foot high 230-kV double circuit wood poled H-frame structures spaced about 700 feet apart.*	PA. 17-2
A-1, ¶2.	Insert at the beginning *The proposal would also require a 2-mile double circuit 230-kV line from the BPA line to the new substation NW of Alturas.*	PA. 17-3
A-1, ¶2.	Insert after (USFS), *Bonneville Power Administration,.....*	PA. 17-4
A-12, ¶3.	Change "190 MW" to *252 MW.*	PA. 17-5
A-25, ¶3.	Improve Transmission Service. Move the first sentence of the fifth P that says *The proposed Project would provide BPA an alternative wheeling path for service to its customers.* to the beginning of the fourth P.	PA. 17-6
A-37, ¶3, first sentence.	Change "two nuclear plants" to *one nuclear plant.*	PA. 17-7
B-1, last ¶.	Add as last sentence *BPA would construct, own, and operate a 2-mile segment connecting an existing BPA 230-kV line to a new substation near Alturas.*	PA. 17-8
B-3, ahead of ¶3.	Insert *BPA's 230-kV portion would use double circuit 230-kV wood pole H-frame structures, about 85 feet tall and spaced about 700 feet apart.*	PA. 17-9
B-4, add the following to Table B-2.	*BPA transmission line.* • *Route length 2 miles* • *Start at BPA's existing 230-kV line, NW of Alturas* • *Terminate at new Hilltop Substation NW of Alturas*	PA. 17-10

	• *R/W width 125 feet* • *Structures double circuit 230-kV H-frame wood* • *Conductors: six single wires* • *Shield wires: 1 pair for* • *Structure height: 80-85 feet* • *Distance between structures: about 700 feet* • *Upgrade existing road and build new spur roads to structures*	PA. 17-10
B-5, ¶3, second sentence.	Add *From tap point, a double circuit 230-kV.....*	PA. 17-11
B-11, ¶2, third sentence.	Change "Single pole-structures....." to *Double circuit 230-kV H-frame structures.....*	PA. 17-12
B-11, ¶2, fourth sentence	Add *The 345-kV H-frame...*	PA. 17-13
B-11, ¶2, fourth sentence at the end.	Delete ~~the height of single pole structures would range from 110 to 130.~~	PA. 17-14
B-11, ¶2, fifth sentence.	Add The *steel* H-frame	PA. 17-15
B-11, ¶2, end of fifth sentence.	Delete "the height of single pole structures would range from 110 to 130 feet", and replace with *the wood H-frame structures would be about 85 feet tall.*	PA. 17-16
B-11, ¶2, sixth sentence.	Add The average span between *the 345-kV* structures...	PA. 17-17
B-11, ¶2, end of the sixth sentence.	Add *and for the 230-kV structures 700 feet.*	PA. 17-18
B-11, ¶3, first sentence.	Add *345-kV* structures would.....	PA. 17-19
B-11 ¶3, end of paragraph	Add *The 230-kV portion would support six nonspecular conductor wire and two shield wires.*	PA. 17-20
B-13	New diagram.	PA. 17-21
B-15	Change Alturas Substation to *Hilltop* Substation.	PA. 17-22
B-16, Figure B.2-6.	Change Alturas to *Hilltop.*	PA. 17-23
B-17	Change Alturas to *Hilltop* on the page and throughout the rest of the document.	PA. 17-24
B-17, ¶1, fifth sentence.	This statement concludes that the northern substation is located west of BPA's Warner substation. The map shows it being located toward the south.	PA. 17-25
B.2.2.4	Communication facilities. Add the following: *BPA is proposing to collocate with an existing site user, a new narrow band, point to point microwave radio repeater at Happy Camp Radio Station site. The microwave radios would link from the new Hilltop substation via Happy Camp to the existing Captain Jack substation. If collocation is not possible, then a site would be developed which would encompass a 15.24 m (50 ft) x 30.48 m (100 ft) area bordered by a chain link fence. The building would be 3.04 m (10 ft) x 6.08 m (20 ft) block structure with a new microwave tower and engine generator with propane tank as backup*	PA. 17-26

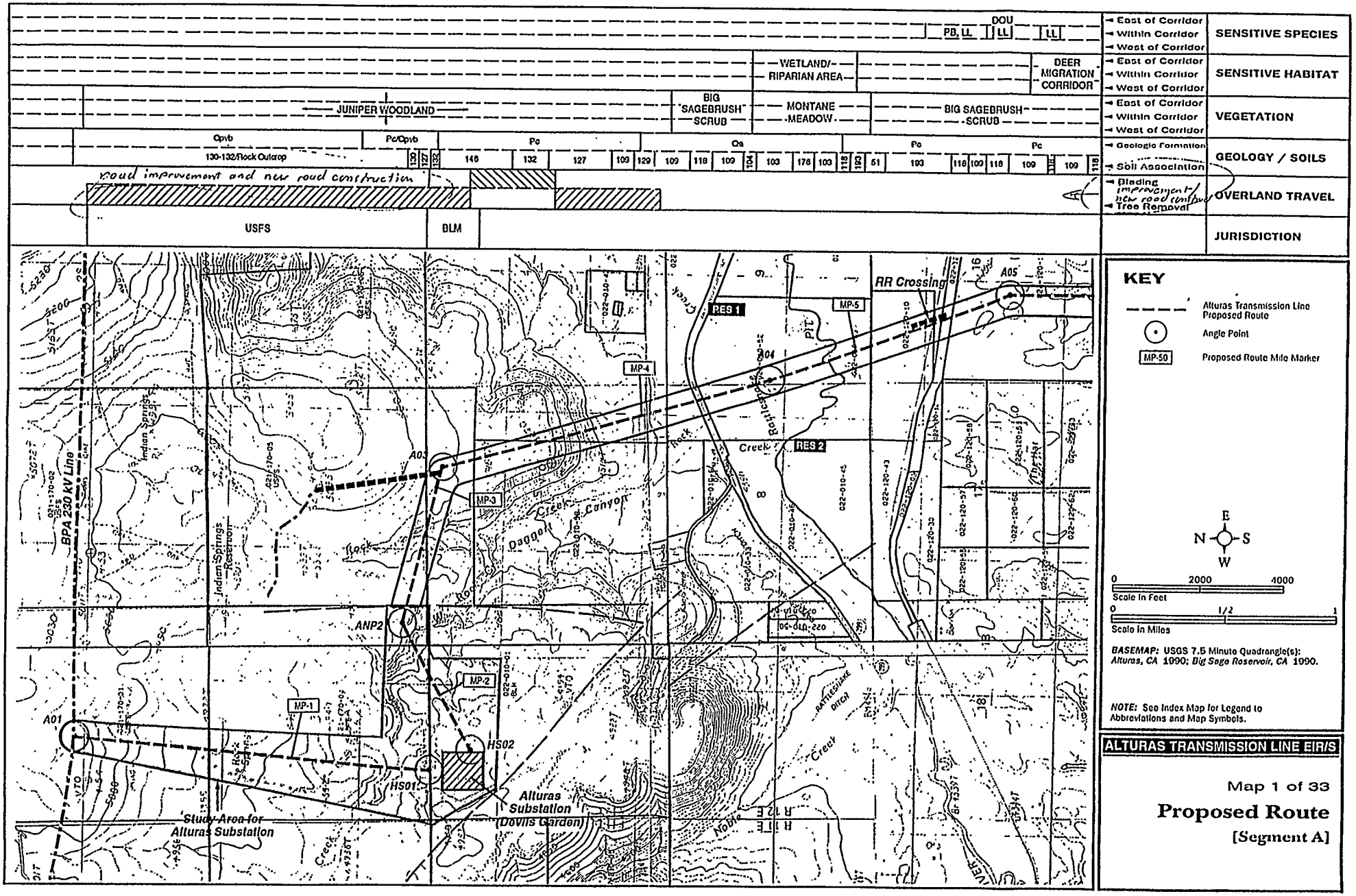
	electricity. Access to the site would be 2-3 times a year plus additional emergency access. BPA will utilize existing microwave radio sites at Captain Jack Substation and Warner Substation. BPA will retain and use the existing UHF radio links from Warner Substation via Happy Camp to Buck Butte. For mobile radio coverage, there is an existing VHF repeater at Happy Camp in the PG&E radio building.	PA. 17-26
B-29, third sentence from top of page.	Change The *fold-in* of the Alturas....to The *loop-in* of the Alturas...	PA. 17-27
B-29, B.2.3.2.	Transmission Line Construction. Add the following to BPA's proportion. *BPA would construct, own and operate a 2-mile double circuit 230-kV line wood pole H-frame structures, about 85 feet tall and spaced about 700 feet apart, from the BPA line to the new substation NW of Alturas.*	PA. 17-28
B-32, Table B-3.	Left column, second row, change overload to *overland.*	PA. 17-29
B-32, Table B-3	Right column, second row, add the following bullet: • along 230-kV portion where no road currently exists	PA. 17-30
B-32, Table B-3	Right column, third row, add the following bullet: • along 230-kV portion	PA. 17-31
B-33, ¶2.	Add the following to the end, *Improvement and new roads along the 230-kV segment may include placement of gravel/rock.*	PA. 17-32
B-33, ¶3.	Add the following to the end, *Tree removal would be coordinated with the Forest Service along the 230-kV portion.*	PA. 17-33
C.8-3.	Change Alturas Substation to *Hilltop* Substation.	PA. 17-34
C.8-3.	Change Alturas Substation to *Hilltop.*	PA. 17-35

If you have additional questions regarding the comments, I can be reached at (503) 230-3797.

Sincerely,

Richard Stone

Richard Stone
Environmental Specialist


East of Corridor
Within Corridor
West of Corridor
SENSITIVE SPECIES
DOU
PB, LL
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LL
SENSITIVE HABITAT
WETLAND/-
RIPARIAN AREA
DEER
MIGRATION
CORRIDOR
VEGETATION
JUNIPER WOODLAND
BIG
SAGEBRUSH
SCRUB
MONTANE
MEADOW
BIG SAGEBRUSH
SCRUB
GEOLOGY / SOILS
Geologic Formation
Soil Association
Qpvb
Pc/Qpvb
Pc
Qa
130-132/Rock Outcrop
146
132
127
109
129
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176
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193
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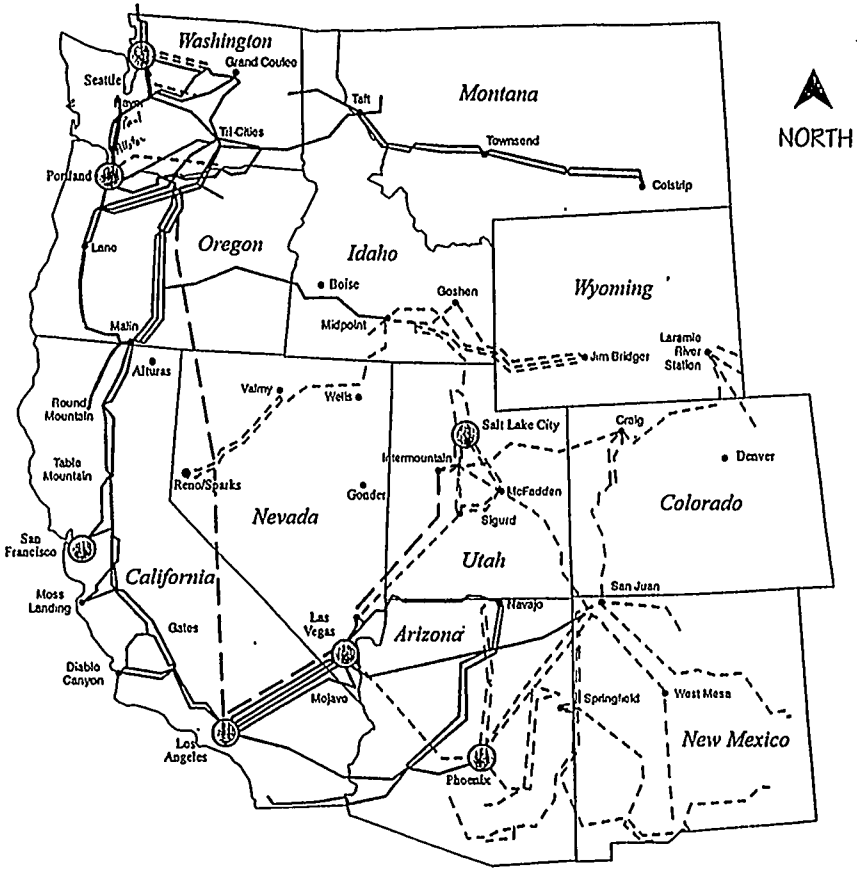
109
118
Road improvement and new road construction
OVERLAND TRAVEL
Blading
Tree Removal
improvement/
new road construct
JURISDICTION
USFS
BLM
KEY
Alturas Transmission Line Proposed Route
Angle Point
MP-50
Proposed Route Mile Marker
E
N
S
W
0
2000
4000
Scale in Feet
0
1/2
1
Scale in Miles
BASEMAP: USGS 7.5 Minute Quadrangle(s): Alturas, CA 1990; Big Sage Reservoir, CA 1990.
NOTE: See Index Map for Legend to Abbreviations and Map Symbols.
ALTURAS TRANSMISSION LINE EIR/S
Map 1 of 33
Proposed Route
[Segment A]
RR Crossing
A05
A04
A03
A02
A01
ANP2
HS01
HS02
RES 1
RES 2
MP-1
MP-2
MP-3
MP-4
MP-5
BPA 230 kV Line
Indian Springs Reservoir
Rock Creek
Dagger Canyon
Rattlesnake Creek
Tip Top
Alturas Substation (Devils Garden)
Study Area for Alturas Substation
Noble Creek
RATTLESNAKE DITCH

Add the following lines to this page



± 500 kV DC
500 kV AC
345 kV

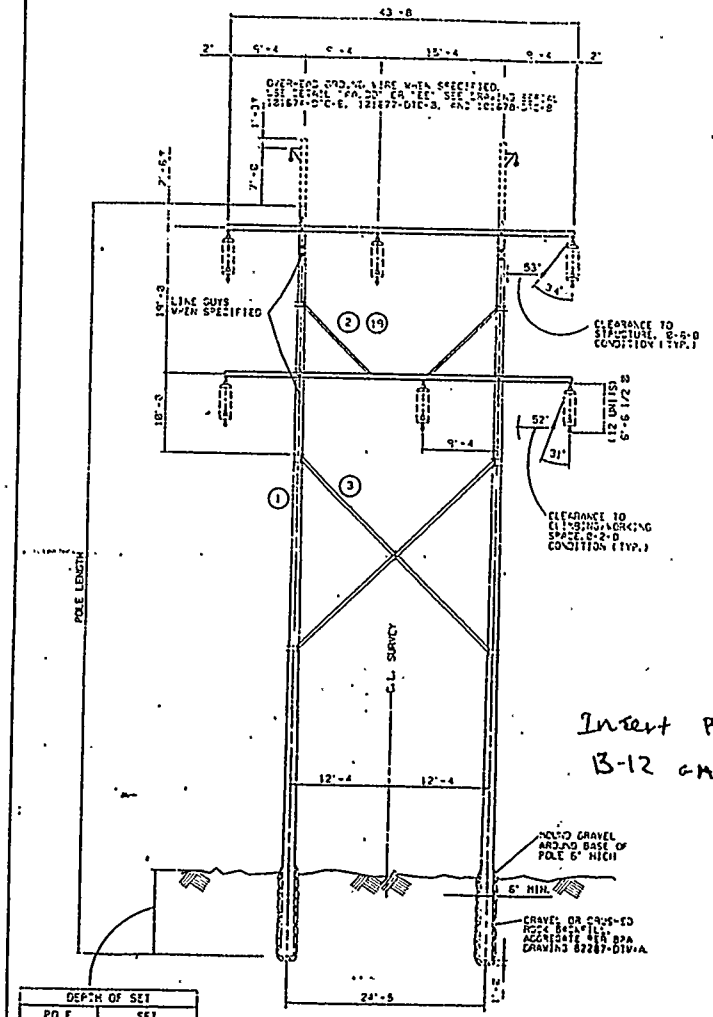
Note: Not to scale

ALTURAS TRANSMISSION LINE EIR/S

Figure A.6-1

Western Systems Coordinating Council Regional Transmission Network

Source: Western Systems Coordinating Council



Insert Between B-12 and B-13

TYPE N A 1 A

230-kV double circuit wood H-frame

RECEIVED JUN 05 1995

DEPARTMENT OF THE ARMY
SIERRA ARMY DEPOT
HERLONG, CALIFORNIA 96113

REPLY TO ATTENTION OF:

May 30, 1995

Environmental Management
Division

Public Agency Comment Set 18

California Public Utilities Commission
Bureau of Land Management
c/o Espin Environmental Group
30423 Kenwood Street, Suite 218
Agoura Hills, California 91301

Gentlemen:

Upon review of the Sierra Pacific Powerline Company (SPPCo) Alturas Transmission Line Project, request the following questions be addressed in the upcoming Environmental Impact Statement:

a. Where the transmission line crosses Sierra Army Depots (SIAD) Main Mag Road, will SPPCo keep access open for daily use?

b. Will SPPCo maintain access (keep it graded and watered) during construction?

c. If SPPCo requests SIAD to use an alternate route, will they maintain (keep it graded and watered)?

d. If SPPCo does not maintain access or alternate route, will SIAD be able to bill them for our resource expenditure?

PA. 18-1

The point of contact at Sierra Army Depot is Wayne Dreyer at (916) 827-4565.

Sincerely,

A. G. Riess
Director of Public Works

RECEIVED JUN 05 1995

WASHOE COUNTY
PARKS & RECREATION DEPARTMENT

WASHOE COUNTY

DEPARTMENT OF PARKS & RECREATION

2601 PLUMAS STREET
POST OFFICE BOX 11130
RENO, NEVADA 89520-0027
PHONE (702) 828-6642
FAX (702) 829-8014

May 18, 1995

Public Agency Comment Set 19

Julie Halligan/Peter Humm
CPUC/BLM
C/O Aspen Environmental Group
30423 Canwood St, Suite 218
Agoura Hills, CA 91301

RE: Alturas Transmission Line
CPUC Application Number 93-11-018
BLM Case Number CACA-31406

Dear Ms. Halligan and Mr. Humm:

As chairman of the Rancho San Rafael (RSR) Advisory Board I am writing this letter to inform you of recent action taken by the Advisory Board. Rancho San Rafael is Washoe County's premier regional park and offers a wide range of activities including picnicking, playgrounds, an excellent museum and arboretum complex, hiking and mountain biking. The park extends from the old pastoral ranch lands to a scenic uplands overlooking the Truckee Meadows.

The 1990 Master Plan established the advisory board, whose members are appointed by the Washoe Board of County Commissioners, to oversee development of the park and advise the Washoe County Park Commission on matters pertaining to RSR.

On April 13, 1995, the RSR Advisory Board met and considered an agenda item titled 'Sierra Pacific Power Company's Proposed Alturas Power Line/Proposed Forest Service Land Exchange for Evans Creek Dam Borrow Pit'. This refers to the proposal by Sierra Pacific Power Company to route a 345 kv power line along the current boundary of RSR. Discussion of the matter pointed out some issues in the draft EIR/EIS that are in error. The draft EIR/EIS by Aspen Consulting is based on old maps of the area that do not reflect recent and future additions to RSR. PA. 19-1

For example, in 1993, William and Barbara Thornton made a large gift of land to RSR that included the entire headlands of the current park. The proposed power line route is immediately adjacent to and overlooks that addition. In addition, the draft EIR/EIS fails to mention current negotiations between Washoe County Parks Department and the U.S. Forest Service aimed at transferring a parcel of federally owned land to RSR. The proposed route traverses this parcel and thus will cut directly across RSR when the land transfer is made.

WASHOE COUNTY IS AN EQUAL OPPORTUNITY EMPLOYER

At the April 13 meeting, comments were offered by members of the advisory board and several members of the public. The minutes of that meeting will show that not one voice was raised in favor of routing this major power transmission line at its current proposed location.

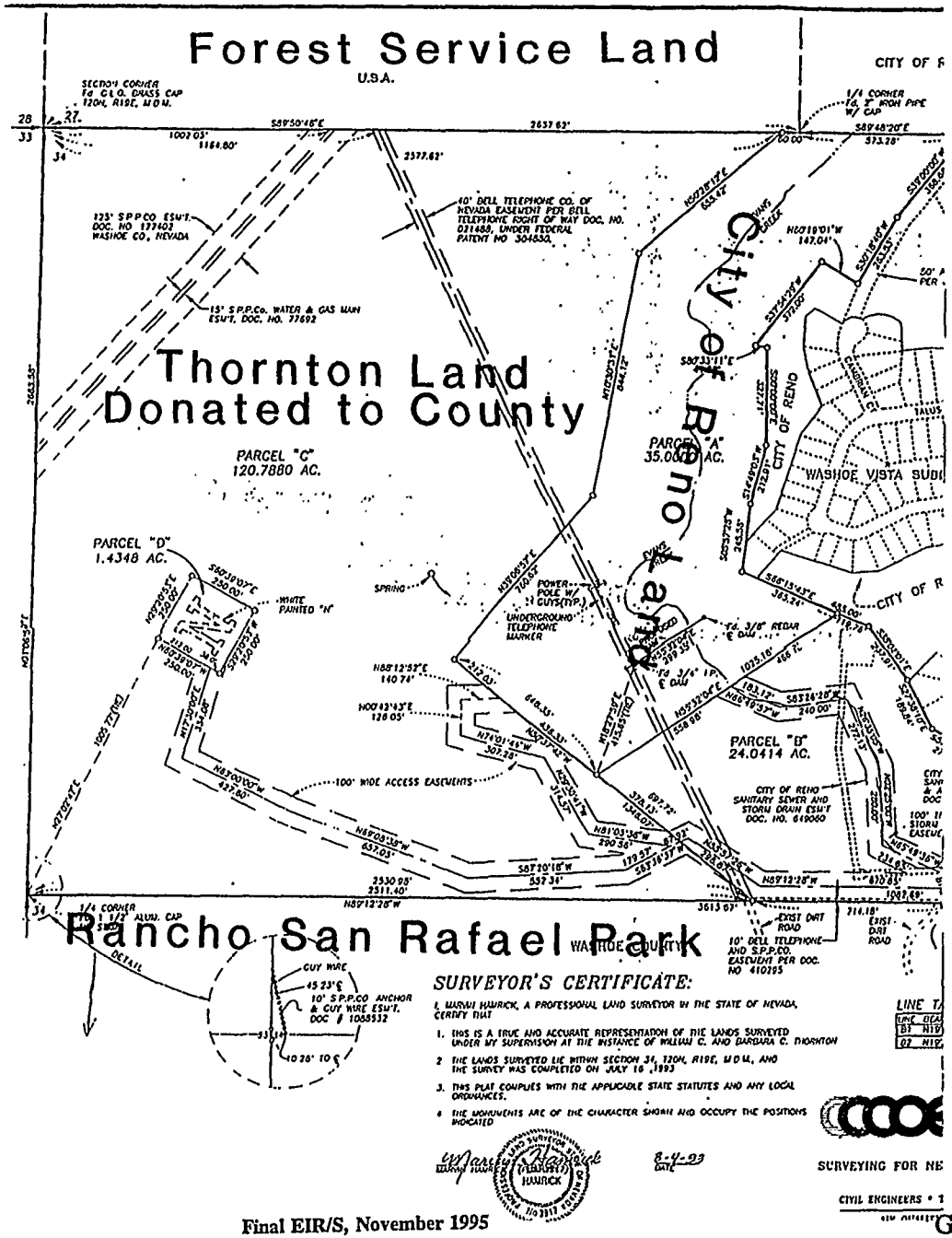
The RSR Advisory Board unanimously passed a resolution to inform the relevant agencies of the issues at RSR and recommend strongly against the current proposed route. Power transmission lines of this size are clearly not compatible with parks and every effort should be made to prevent the obvious effects of such a project on RSR. PA. 19-1

Sincerely,

Bill Albright

Bill Albright, Chairman
Rancho San Rafael Advisory Board

BA:cp



Fax for Carol Page

from Bill Albright.

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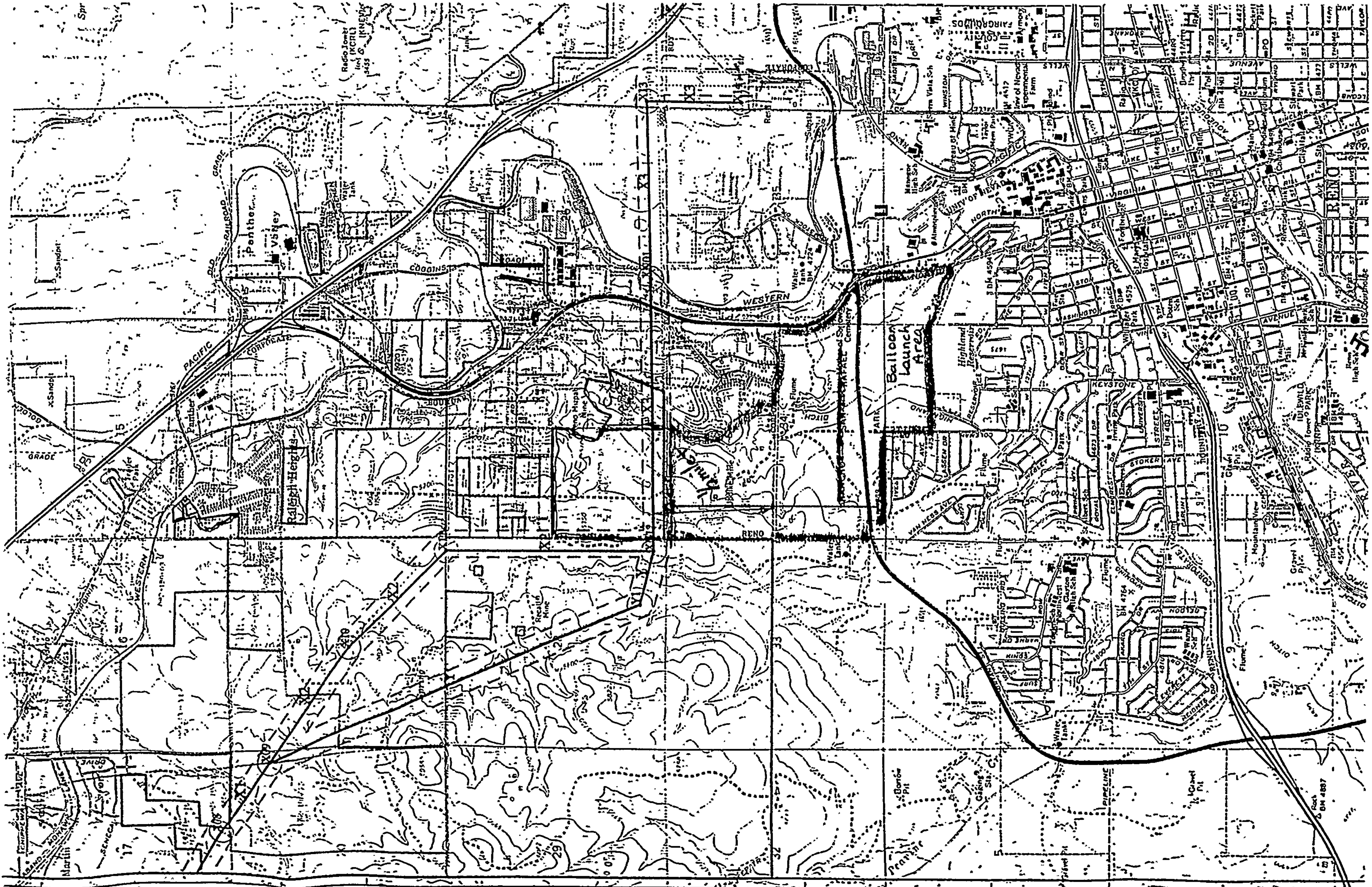
Bill Albright
Chairman, Rancho San Rafael Park Advisory Board


Balloon Launch Area
RENO
WESTERN
PACIFIC
Panther Valley
Raleigh Heights
VIRGINIA
FAIRGROUNDS
Highland Reservoir
Flume
DITCH
KEYSTONE
CORPORATE
PIPELINE
Borrow Pit
Gravel Pit
Mountain View Cemetery
Water Tank
COGGINS
GRADE
Univ of Nevada

Post-it® brand fax transmittal memo 7671	# of pages ▸ 1
To KAREN MUIRN	From CHRIS BARRETT
Co.	Co.
Dept.	Phone # 689-4956
Fax # 639-8014	Fax #

To: John MacIntyre

ALTURAS TRANSMISSION LINE PROJECT EIR/S

The public review period for the Alturas Transmission Line Draft Environmental Impact Report/Statement (DEIR/S) has been extended by 30 days. The end of the public comment period is now June 2, 1995. ***Written comment letters must be postmarked by June 2, 1995 to assure their consideration in the Final EIR/S.*** Please include the CPUC Application Number (93-11-018) and the BLM Case Number (CACA-31406) on all written comments and send to:

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

RECEIVED JUN 05 1995

United States Department of Agriculture
Forest Service
Humboldt-Toiyabe National Forests
1200 Franklin Way
Sparks, NV 89431

File Code: 2710/1950

Date: June 2, 1995

Julie Halligan/Peter Humm
CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood St., Suite 218
Agoura Hills, CA 91301

CERTIFIED MAIL-RETURN
RECEIPT REQUESTED

Public Agency Comment Set 20

To Whom It May Concern:

This letter summarizes our formal response to the DEIS for the Alturas Power Transmission Line Intertie project that is proposed to cross 7-8 miles of the Toiyabe National Forest along the northern slopes of Peavine Mt. paralleling Hwy 395. Comments will be referenced by page number of the DEIS.

B-58/59 - The level of interest from publics on the proposed route across NFS lands indicates to us that this area has higher public values, primarily related to open space and visual quality, than we realized. Therefore, in comparison to the Eastside Route 2, it may well be on balance that there is an environmental advantage to any alternative including the Eastside Route 2 that does not encumber Peavine Mt. It appears that the visual and open space concerns on Segments X and Y of the preferred route need stronger weighting in comparing alternatives. PA. 20-1

B-62 - It appears again given the public interest that further analysis needs to occur on expanding the North Valley substation and eliminating the Bordertown substation. We do have a concern that users of the Toiyabe National Forest approaching the Dog Valley area from Bordertown will have their recreation experience adversely affected by viewing either the substation or overhead powerlines. PA. 20-2

B-68 - Given the issue of visual and open space concern along Peavine, along with our recent acquisition of 8600 acres of lands on Peavine for open space purposes, it is evident that the only way to mitigate these concerns is by undergrounding facilities across NFS lands on the Toiyabe NF. Therefore, we must have a full discussion of this alternative in the DEIS. The analysis must contain the comparison in resource effects between overhead and underground. It appears there may be two ways to accomplish this alternative. One is to bury a 345 KV line. Another is to bury a lower voltage line, such as a 120 KV, from a substation, wherever that may be located, prior to entering NFS lands. PA. 20-3

B-83 - The Nevada Route Alternative seems to offer the least environmentally degrading alternative. Although we are not familiar with the Alturas-LADWP corridor, it only impacts 47 miles of new corridor as opposed to the 164 miles of new corridor that will be established with the preferred route. This should be a very clear superior environmental advantage. Given the concerns of crossing Sparks, perhaps either another substation could be constructed somewhere to avoid Sparks, a lower voltage line could be installed from Tracy to Reno, or undergrounding could be facilitated. It seems that the LADWP line is the logical north-south route to tap Northwest hydroelectric power in Nevada/Eastern California. Establishing an additional north-south route in this region seems both redundant and environmentally unacceptable to the public lands. The Management Decisions Summary (1987) for the Lahontan Resource Area, pages 25 and 26, supports this premise. There is no discussion that we could find in any BLM planning documents that supports the notion of a new north-south corridor along 395. PA. 20-4

C.3-56 - Off-site compensation. There has been a number of comments raised about the proliferation of powerlines in the Rancho San Rafael Park area. One of the mitigation measures for the preferred proposal that needs discussion in the document is undergrounding other transmission lines in this area. PA. 20-5

C.3-79 - Include the USFS as additional party. We are not sure if USFWS was meant to be USFS in paragraph B-6 and throughout this section C.3. PA. 20-6

C.3-83 - Golden Eagles have been reported in the Horizon Hills area. PA. 20-7

C.8-24 - Include the Peavine Mt. area in the last paragraph. Recreation activities include bike riding, horseback riding, and hiking. PA. 20-8

C.8-61 - We recommend that USFS land be described more accurately as NFS (National Forest System) land. USFS is an agency, not a landowner. This should be done throughout the document. PA. 20-9

C.10-23 - Fire hazard - The Peavine area has a fairly frequent number of large wildland fires. Undergrounding will improve the ability of fire suppression resources to control wildland fires. Overhead lines will interfere with aircraft and ground resources. PA. 20-10

C.11-6 - Include the Forest Service in C.11.1.4.1 as another agency for fire protection responsibility. PA. 20-11

C.11-8 - The Toiyabe NF has two engines in this area, one located at Sparks, and one located at Boomtown, both of which would respond to this area of the Toiyabe NF within the project area. PA. 20-12

C.13-24 - KOP #19, Hoge Road, should display what both alternatives would look like in the photo simulation for comparison. PA. 20-13

C.13-43-45 - Given the public concern and the inconsistency cited in Table C.13-9 with Washoe County's Regional Open Space Plan, the only reasonable mitigation for NFS lands appears to be undergrounding. This needs discussion in this section. PA. 20-14

Caring for the Land and Serving People

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FS-6200-26b (12/93)

Page 3

C.13-66-67 - Significant and unavoidable impacts can be avoided by undergrounding. PA. 20-15

C.14-6 - Timing of this project or as a factor in our decision making will not be included, and therefore may be irrelevant in the discussion here. It is the company's responsibility to consider the length of the EIS process in their proposals on federal lands, and the fact that other alternatives may be generated or further discussed as a result of public and agency review of the proposals which may well delay the proponent's timing. PA. 20-16

D-13 - We disagree with the conclusion that the proposed project is superior to other transmission alternatives. This is primarily based on the difference between the new corridor mileages between the Nevada Route Alternative and the proposed project. 47 miles vs. 164 miles. This difference clearly dictates a superior environmental advantage by the Nevada Route alternative. PA. 20-17

E-1 - It is highly likely that if the proposed project is approved, additional utility requests will occur in the future along this route. A separate discussion of the cumulative impacts of a new utility corridor should be included in this section. PA. 20-18

In summary, the document is very weak in expressing the purpose and need for using NFS lands on the Toiyabe NF. As we have expressed in previous correspondence, a clear need must be demonstrated for using NFS lands. This has not been demonstrated in the DEIS. Simply providing a corridor for secondary backup power, when it appears much of the power will go elsewhere, is not sufficient cause for us to permit this use. PA. 20-19

There was not a thorough discussion of alternatives in the document. Further study of the Nevada Route alternative needs discussion. This routing provides much closer access to some of the customer markets such as the mining industry. An undergrounding alternative needs discussion. The alternative of converting power outside of the Reno area from 345 KV to 120 KV deserves much more analysis. This alternative would seem to mitigate all the local Washoe Co concerns regarding large overhead 345 lines. 120 KV undergrounding would resolve these issues. It seems that today's social climate just will not tolerate crossing private or urban interface public lands with large overhead power lines such as is proposed. Undergrounding of a 345 needs to be analyzed as well. PA. 20-20

Sincerely,

R.M. "JIM" NELSON
Forest Ssupervisor

cc: Sierra Pacific Power, Roger Olak
Washoe Department of Comprehensive Planning, B. Whitney
Lori Burke
Department of Fish and Game, Redding, CA, J. Nelson
Sierra County Planning, T. Beals
Washoe County Commissioners
Modoc NF, S.O., R. Sharp

STATE OF CALIFORNIA—THE RESOURCES AGENCY PETE WILSON, Governor

CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814 5512

June 1, 1995

JUN 05 1995

Julie Halligan/Peter Humm, CPUC/BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Public Agency Comment Set 21

Dear Ms. Halligan/Mr. Humm:

DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT FOR THE ALTURAS 345 KV TRANSMISSION LINE PROJECT (CPUC NO. 93-11-018, BLM NO. CACA-31406, SCH NO. 94042001)

Staff of the California Energy Commission (Commission) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIS/R) and Appendices for the Alturas 345 kV transmission line project. We found the documents to be very thorough and well presented. We offer the following comments on cultural resources, socioeconomics/public services, visual resources, soils, hazardous materials management and paleontological resources. In addition, we offer comments in the area of transmission system right of way alternatives and growth inducing impacts of the new substation.

GENERAL COMMENTS

The width of the potential impact corridor described in the DEIS/R is 660 feet, within which only 160 feet will be needed for the transmission line right of way. The DEIS/R includes the potential construction impacts associated with the transmission line, upgrading existing roads, new access, and staging areas. However, there may also be construction impacts related to pole or tower laydown areas, pulling sites, and spur roads up to isolated tower or pole bases. If such areas of disturbance fall outside the 660-foot corridor already evaluated for resource potential, there will be an increase in impact potential. PA. 21-1

CULTURAL RESOURCES

The discussion was brief and well presented. Paragraph C.4.5 indicates that the mitigation measures required for the project will be implemented through the provisions of a Programmatic Agreement being prepared by the Bureau of Land Management (BLM). Cultural Resources Mitigation Measure C-1 specifies that a Monitoring and Treatment Plan is to be prepared prior to the start of construction. Commission staff would be interested in receiving a copy of the draft Programmatic Agreement and the draft Monitoring and Mitigation Plan. PA. 21-2

SOCIOECONOMICS/PUBLIC SERVICES

The DEIS/R states that even though some skilled craft workers will be required from outside the project area, based on the number of construction trades that are expected to work on the 160-mile corridor at a given time and location, no adverse impacts to public services, utilities, housing, and/or schools are expected to occur in the four-county project area because of project construction. PA. 21-3

However, adding a single student to a school that is at or over capacity can be considered an adverse impact. Without conducting surveys of all potentially affected school districts in the four counties, we recommend adding the following mitigation measures to ensure that local impacts to public services and schools are minimized by in-migrating workers:

> S-3: The project owner and its contractors and subcontractors shall recruit employees and procure materials and supplies within the local area unless:
>
> - to do so will violate federal and/or state statutes;
> - the materials and/or supplies are not available; or
> - qualified employees for specific jobs or positions are not available.

PA. 21-3

VISUAL RESOURCES

p.ES-14: The document states that Proposed Segment N is considered environmentally superior (to its alternative, Segment M), "because of clear advantages to visual resources, land use, and cultural resources". However, the visual resources section (pp.C.13-39 and C.13-61) states that both Segment N and Segment M would create a significant, unavoidable visual impact. It is therefore not clear how Segment N has a clear advantage over Segment M in regard to visual resources. PA. 21-4

p.C.13-26: The document states that an impact on visual resources is generally considered significant if it results in "A high level of visual contrast as related to spatial characteristics, visual scale, texture, line and color". The factor of "form" should be added to this list. PA. 21-5

p.C.13-32: The document states that the project's impact is not considered significant for Segment A01-HS01 and Segment HS01-ANP2 "due to the relatively small number of visitors to this area", even though for people seeking outdoor recreation activities some views from the back-country roads will be dominated by the transmission line. A small number of viewers is also used as the reason that visual impacts will not be significant for other sections of the transmission line. This position appears to contradict the statement on p.C.13-30 that:

> "In more remote areas of the route, particularly where there is recreational access, the number of viewers would be lower than along the major travel corridors (i.e., US 395), but the expectations for unimpaired scenic quality would typically be greater".

The implication of this statement is that the heightened expectation of scenic quality in more remote recreational areas offsets the lower number of viewers so that it is possible for visual impacts to be significant. The document should clarify whether visual impacts can be significant if the number of recreational viewers is small. If they can be, the document should specify what conditions are required for an impact to be significant. PA. 21-6

p.C.13-40: The mitigation measure identified in the second paragraph should be V-9, rather than V-10. PA. 21-7

p.C.13-61: For segments (such as Segments M and N, or S and T) that are alternatives to each other and both would cause significant, unmitigable impacts, the text should assess the relative visual impact of the segments. PA. 21-8

p.C.13-64: The text states that Alternative Segment WCFG provides an alternative route to Proposed Segments W and X. However, Figure C.13-D shows Alternative Segment WCFG as an alternative only to part of Segment W. PA. 21-9

p.C.13-66: The text states that Alternative Segment X-East would result in a moderate level of change in the existing landscape, and therefore would not be consistent with the applicable BLM VRM Class III management prescriptions. This appears to be inconsistent with the conclusion reached regarding Segment Y (p.C.13-45), that Segment Y is consistent with the BLM Class III objectives, even though the text states that for alternative Segment Y the resulting change in the landscape would also be moderate. PA. 21-10

SOILS

On page C.6-40, No. 7. (Use special rehabilitation measures where appropriate.), it is stated that for slopes greater than 15 percent mulch or erosion-control matting should be used to protect the seed and seed bed from erosion by wind and water. Since mulches foster plant germination and growth and significant erosion can occur on even gentle slopes, mulches should be considered for all areas being revegetated. PA. 21-11

HAZARDOUS MATERIALS MANAGEMENT

Section C.10.2.3.2 (pages 48 and 49) states that the project will involve the use of propane and explosives. However, there is no discussion indicating the quantity of these materials or where they will be stored or handled. When explosives are present in populated areas or areas of frequent public use, they may pose a risk of significant impacts. We recommend that further information be provided in this regard. PA. 21-12

PALEONTOLOGICAL RESOURCES

A discussion of paleontology was included in the section of the DEIS/R that also addressed geology and soils. There was a good discussion of the various geologic formations that may include fossil resources, but there seemed to be an under-assessment of the potential for these resources to have significant value. Section C.6.2.1.3 briefly discusses how impacts to fossil resources would be evaluated, but it does not reflect significance criteria set out by professional paleontologists nor does it reflect criteria set forth in a 1978 memo from the then-acting director of the BLM. These criteria are used by BLM in many of the western states and are included in permit conditions imposed on developers working on BLM-managed lands in areas more typically known to have fossil resources. We recommend using these criteria in addition to the Mitigation Guidelines published by the Society for Vertebrate Paleontologists. PA. 21-13

The DEIS/R seems to undervalue the potential for this project to impact significant paleontologic resources. The description of the various geologic formations present along the route(s) indicates there are Pliocene- and Pleistocene-age lake deposits, other wind and water generated sediments, and possibly some Miocene-age, non-marine sediments -- all of which have produced significant fossil materials in other parts of California and in the Western US. The land forms, sediments, climatic history, and current vegetation patterns are quite similar to parts of the Mojave Desert in Southern California which have PA. 21-14

produced a rich variety of fossils, sometimes in areas where fossils were not expected.

The DEIS/R indicates the consultant had reviewed records at the UC Berkeley and UC Davis museums, and no known fossil localities were identified in the literature. We believe this may be more a function of a lack of research in this part of California rather than a lack of fossils being present. The DEIS/R also states that the consultant discussed the fossil potential with geology staff at the University of Nevada at Reno and they indicated there may be vertebrate fossils in the lake deposits. PA. 21-14

We recommend that the project geology consultants also contact Kathleen Springer and Bob Reynolds at the San Bernardino County Museum in Redlands (909) 798-8570; Dr Mike Woodburne at UC Riverside (909) 797-5028; Dr David Whistler, Los Angeles County Museum of Natural History (213) 857-8317 or c/o Paleo Environmental Associates, (818) 797-9895; and George Jefferson, Anza-Borrego State Park research center (619) 767-5311. These researchers can provide additional insight into the potential for fossils along the Alturas transmission line route(s).

Based on prior discussions with these paleontologists, we believe further review of additional museum records and a pre-construction reconnaissance survey may be needed in those portions of the route(s) which cross through the ancient lake beds and other sedimentary deposits. We also recommend that a qualified paleontologic resources monitor be present during augering or grading in those segments of the route that cross such sedimentary deposits. Based upon the survey results, a paleontologic resource monitoring and mitigation plan should be developed and implemented by a qualified professional paleontologic resource specialist familiar with Plio-Pleistocene lake deposits and sediments. The required monitoring and fossil recovery can be accomplished with no delay to the project construction schedule, as long as these efforts have been planned ahead of time and implemented by a qualified specialist, in coordination with the project owners and appropriate agencies. PA. 21-15

TRANSMISSION SYSTEM RIGHT OF WAY ALTERNATIVES

Opening of new rights-of-way (ROW). As proposed, the Alturas Transmission Line Project represents the opening of entirely new ROW. Developing new ROW produces the highest level of impacts, particularly when this creates entirely new utility corridors.[1] Using upgraded or expanded ROW produces significantly lower natural resource, land use and other environmental impacts than using new ROW. PA. 21-16

[1] Accordingly, the California Legislature adopted Senate Bill 2431 (Chapter 1457, Statutes of 1988) which finds that it is in the state's best interest to minimize the adverse economic and environmental impacts of new transmission by first pursuing those options with a lower potential for adverse impacts. The Legislation directs that the State, through existing licensing processes, accomplish the following:

(1) *Encourage the use of existing right of way* by upgrading existing transmission facilities where technically and economically feasible.
(2) *Encourage expansion of existing right of way*, if technically and economically feasible, whenever construction of new transmission lines is required.
(3) *Provide for the creation of new right of way* if justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency.
(4) *Seek agreement among all interested utilities* on the efficient use of new transmission capacity whenever there is a need to construct additional capacity.

Alternatives involving the use of existing ROW or expansion of existing ROW should receive thorough consideration. For example, the Los Angeles Department of Water and Power (LADWP) Corridor Alternatives, consisting of the Nevada Route Alternative and the Summer Lake-Valley Road Alternative, have "the potential environmental advantages of passing through areas that may be less sensitive than the Proposed Project" (page B-83). Mirroring the second policy in SB 2431, these two alternatives would travel within the existing LADWP 1000 kV DC transmission line corridor, which runs in a north-south direction through the northwest part of Nevada. These alternatives were preliminarily studied by Sierra Pacific Power Co. (SPPCo) for their technical feasibility and estimated cost without site specific routing information. As a result, the analysis of these alternatives and their elimination by SPPCo was limited to only a qualitative assessment early on in the process. PA. 21-16

It appears that the LADWP Corridor Alternatives would meet all of the primary objectives for the proposed project. The LADWP Corridor Alternatives are also consistent with the SB 2431 policy of pursuing the expansion of existing ROW before creating new ROW. Transmission projects such as the Alturas Transmission Line Project, which represent the opening of new ROW, should be weighed very carefully and alternatives involving the use of existing ROW or expansion of existing ROW should receive thorough consideration.

Lack of Coordinated Transmission Planning. As proposed, the Alturas Transmission Line Project serves very narrow interests; specifically, those of SPPCo. SPPCo has independently determined the need for the proposed project in response to their own system reliability needs, their projected load growth, and forecasts of power pool and bulk power market conditions.

In contrast to individual utilities planning and constructing transmission lines for their own needs is the preferred approach of coordinated transmission planning. Coordinated transmission planning is one means of meeting the transmission needs of all potential transmission users and promoting the efficient use of transmission and environmental resources (including minimizing new ROW). The fourth policy in SB 2431 states that when there is a need to construct new transmission capacity, it is in the state's best interest to "seek agreement among all interested utilities on the efficient use of that capacity." The clear intent of this guideline is to involve all potential transmission users in the planning process as a means of accommodating various transmission needs. By taking these interests into account at the planning level, the potential for developing duplicative transmission facilities is reduced, opportunities for improved resource integration within areas of the state are enhanced, and the need for creating new transmission corridors and ROW can be minimized. PA. 21-17

The Alturas Transmission Line Project appears to be a single purpose project serving very narrow interests. As a result, opportunities for minimizing the opening of new ROW may not have been explored. We believe the document should address alternatives consistent with the ROW selection principles contained in SB 2431.

Growth Inducing Impacts of the new Border Town Substation. Page B-20 of the DEIS/EIR states, "Phase angle regulation would be required at the Border Town Substation to control power flow over the transmission line; to accomplish this, a phase angle regulating transformer (phase shifter) would be required." In other words, the proposed Border Town Substation is planned as the site for the proposed project's phase angle regulation. Although a phase shifting transformer may be appropriate for the operation of the proposed project, this phase shifting transformer could be just as effective placed at either PA. 21-18

terminus of the project (Hilltop or North Valley Road). As a result, the need for a phase shifting transformer does not justify the need for a new substation. We believe the document should address the growth inducing impacts of the new Border Town Substation. PA. 21-18

We appreciate the opportunity to provide you with comments. If you have questions or would like more specific information please contact Lorri Gervais of my staff at (916) 654-4678.

Sincerely,

Robert L. Therkelsen, Deputy Director for
Energy Facilities Siting and Environmental Protection

cc: State Clearinghouse

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WASHOE COUNTY COMMISSION

1001 E. 9th Street
P.O. Box 11130
Reno, Nevada 89520
(702) 328-2005

Public Agency Comment Set 22

May 31, 1995

Julie Halligan, CPUC/Peter Humm, BLM
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

Subject: CPUC Application # (93-11-018) BLM Case # (CACA-31406)

Dear Ms. Halligan/Mr. Humm:

The Washoe County Commission, an elected Board representing the citizens of Washoe County, respectfully requests an extension of the public comment period for the Draft Environmental Impact Report/Statement (DEIR/S) for the proposed Alturas Transmission Line Project. The Board understands that the comment period was previously extended from May 3, 1995 to June 2, 1995. The Washoe County Commission is requesting the additional extension in time to assure consideration in the final EIR/S of the written comments contained in this correspondence. The previous extension seemed to be successful in allowing time for interested Washoe County residents to submit their concerns in writing. Due to full agendas and legal noticing requirements, the County Commission requires a longer lead time to receive input from the concerned residents and formulate a response to the proposed project.

BACKGROUND

Staff members from the Department of Comprehensive Planning, Conservation and Natural Resources Program, previously submitted written comments on the DEIR/S. Their reviews and individual comments were appropriately focused on their areas of expertise. A much broader field of issues and concerns exists pertaining to the proposed project that need to be expressed. The County Commission has been receiving an increasing amount of calls and letters from concerned citizens and, in response, held a workshop on the proposed project on May 22, 1995.

An overriding theme has been heard by Board members being contacted by their constituents. Citizens felt the need for more adequate public noticing and citizen involvement in the planning process for the proposed project. This is most likely the main reason why the County Commission is still receiving correspondence from concerned citizens at this time.

The Board has not passed a formal resolution on the value of the proposed Alturas Transmission Line Project. Purview of 200 KV or larger power transmission lines falls under the Utility Environmental Protection Act (UEPA) and the State of Nevada. Washoe County has no project approval authority over the proposed project.

IDENTIFIED ISSUES

The County Commission wishes to identify and express its concern with the following issues brought to its attention by our constituents. The Board requests that these same issues be adequately addressed in the final EIR/S.

- **San Rafael Regional Park:** The proposed project does not appear to be compatible with the recreational land use found in the northern portion of Rancho San Rafael Regional Park and the adjacent Keystone Canyon area. Rancho San Rafael boundaries are not properly recognized in the DEIR/S and the proposed project's impacts on the park are not adequately addressed. Construction of a major power transmission corridor through Rancho San Rafael Park could set a precedent for such uses in other existing and future parks. PA. 22-1
- **Scenic and visual considerations:** The citizens residing in the Bordertown area and along the Northern and Eastern flanks of Peavine Mountain are concerned that their scenic views of Long Valley and Peavine will be degraded. Visual degradation would occur on the ridgelines and above the canyons of Peavine Mountain if the project is approved. PA. 22-2
- **Health effects of electromagnetic field/surges:** Washoe County citizens living adjacent to the proposed transmission corridor have expressed concern with the possibility of detrimental health effects from electromagnetic fields on their children, pets, livestock and themselves. PA. 22-3
- **Alternative routes:** Many citizens are concerned that the proposed route is not necessarily the environmentally superior route. Concerns were expressed that an alternative route following the existing Los Angeles Department of Water and Power transmission corridor through Nevada did not receive serious consideration. PA. 22-4
- **Maps of Washoe County:** The use of outdated (1983) maps of Washoe County for analysis in producing the Draft EIS/R should be considered a serious flaw. The use of these outdated maps would lead to an underestimation of the extent of urban/suburban growth that has taken place in the North Valleys areas in the past 12 years. PA. 22-5
- **Inadequate notification:** By far, the greatest number of comments concerning a single issue has been the feeling on the part of many citizens that there has been inadequate notification and advertising of the proposed project. Many local residents have expressed that they did not find out about the proposal until late in the public review process. PA. 22-6
- **Quality of life:** The scenic quality of the North Valleys, and Peavine Mountain in particular, is an important component of the quality of life enjoyed by the local citizens. The preservation of the natural resources of Peavine Mountain has been formally recognized in both the Regional Open Space Plan and the text and policies of the North Valleys Area Plan. The Washoe County Planning Commission has adopted Scenic Roadway Corridor Standards (Article 426) as part of the Washoe County Development Code. Article 426 designates U.S. 395 North, Golden Valley Road to the California State Line, as a Scenic Roadway. The primary scenic view from the majority of this highway segment is of Peavine Mountain. Additionally, many citizens have expressed concerns that their property values will be negatively affected by the construction of the proposed transmission lines. PA. 22-7

Proposed Alturas Intertie Project
May 30, 1995
Page 3

- **Need for proposed project:** Given the impending expansion of the Tracy power plant, the existing local geothermal power production and other circumstances, many questions have been raised concerning the actual need for the proposed transmission line project to serve the population of southern Washoe County. PA. 22-8

There remains an important option that many citizens feel has not been properly addressed by Sierra Pacific Power Company beyond "it costs too much". The option is to design and construct the transmission line underground from Bordertown to the North Valley Substation. This underground segment of the project would transverse the most densely populated portion of the entire proposed route and most likely alleviate the majority, if not all, of the issues surrounding the project in Washoe County.

Sincerely,

Jim Shaw

Jim Shaw, Chairman
Washoe County Commission

cc: Washoe County Commission
Carson Ranger District, USFS
Nevada Public Service Commission
Nevada Consumers Advocates Office

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STATE OF CALIFORNIA--THE RESOURCES AGENCY

PETE WILSON, Governor

DEPARTMENT OF FISH AND GAME
1416 NINTH STREET
P.O. BOX 944209
SACRAMENTO, CA 94244 2090
(916) 653-4875

Ms. Julie Halligan
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102-3298

Mr. Peter Humm
Bureau of Land Management
705 Hall Street
Susanville, California 96130

Public Agency Comment Set 23

Dear Ms. Halligan and Mr. Humm:

Draft EIR/EIS
Sierra Pacific Power Company
Alturas Transmission Line Project

The California Department of Fish and Game has reviewed the draft environmental impact report/environmental impact statement (DEIR/EIS) for the Sierra Pacific Power Company's (Sierra Pacific) Alturas Transmission Line Project and offers the following comments.

General Comments

The DEIR/EIS proposed for the project is lacking the "Soil Conservation and Erosion Control Plan" and the "Community and Habitat Restoration Plan" referred to in the document. The mitigation measures described in the DEIR/EIS cannot be fully evaluated without these plans. PA. 23-1

The off-site mitigation measures developed for disturbance to plant communities and habitats are inadequate due to partial, incomplete estimates of the acreage impacts presented in the DEIR/EIS. PA. 23-2

There are still problems with the literature citations. In some cases authors will be cited in the text but not listed in the reference section. In other cases the date shown in the text does not match the date listed with the reference. PA. 23-3

Specific Comments

Executive Summary

Page ES-14

Proposed Segment N - Segment N is discussed but no Segment N is labeled on the ES maps. PA. 23-4

4.2.1 Proposed Project - The approximate acreage of surface removal and disturbance are inconsistent in the text. The DEIR/EIS states that approximately 180 acres of surface removal would occur during construction of the proposed project. However, the basis for this estimate is not provided in the text. PA. 23-5

The document states that 750 structures are to be installed.

Please list the specific number and type of structures and the approximate surface removal associated with each type (refer to comments for page B-39 below). In addition, Table B-4 (page B-34) indicates that approximately 573 hillside crane landings will be excavated for structure locations but no quantification of surface disturbance is provided (refer to comments for page B-34 below). An estimate of the area of habitat that will be removed by construction of new access routes and permanent overland access routes within the 660-foot right of way (ROW) is not presented in the document (refer to comments for page B-32 below). Please provide a revised estimate of disturbance that clarifies this and more accurately calculates the area disturbed. PA. 23-5

The DEIR/EIS states that an additional 53 acres would be "disturbed but not removed". On page B-29, the document states that "approximately 7,500 square feet of land would be disturbed at each wire and structure setup site". The project proposes to set up an estimated 730 structures. The total amount of surface disturbance would approximate 5,475,000 square feet or 125.67 acres, not 53. The final EIR/EIS should provide quantitative support in the text for the total amount of surface removal and disturbance estimates presented in the document and reference that these estimates of disturbance should be consistent throughout.

Page ES-19

Vegetation Resources, first full sentence at top of page - Those roads Sierra Pacific plans to use for emergency access should be fully mitigated for both loss of habitat and impacts due to increased public access. Sierra Pacific should take reasonable steps to prevent public access to these access roads.

The Department has taken steps to preclude vehicle access to that portion of the Hallelujah Junction Wildlife Area (HJWA) east of Highway 395. This has been difficult to attain. Vehicle trespass from the south (Bordertown) continues. New visible access roads will surely encourage an increase in trespass. Acceptable mitigation is required for this increase. Mitigation should include permanent, successful denial of access from the south inside the ROW fence. PA. 23-6

Pages ES-20 and 21

4.2.2 Project Alternatives, Madeline Plains Alternative Alignments - This paragraph does not mention wildlife impacts.

Please discuss sage grouse strutting ground (lek), brood rearing and winter habitat impacts. Segments F and H traverse important sage grouse habitat. PA. 23-7

Page ES-21

Ravendale Alternative Alignment - Please include pygmy rabbits in the discussion of Segments J and I. PA. 23-8

East Secret Valley Alignment - A significant difference exists between plant communities/habitat types in Segment L and Segment East Secret Valley Alignment (ESVA). The ESVA has potential to adversely affect rare and PA. 23-9

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Three

endangered species. The DEIR/EIS indicates that biological surveys have not been completed, yet the ESVA is listed among the environmentally superior routes. The Department believes that it is inappropriate to consider the ESVA as environmentally superior at this time. The discovery of significant biological resource issues following preparation of the draft EIR would constitute new information of substantial importance. Should potentially significant biological impacts be found to be associated with the ESVA, the Department requests that a supplemental EIR be prepared and circulated as per Section 15163 of the CEQA guidelines. PA. 23-9

Pages ES-45 through ES-47

Impact Summary Tables, Class II - This table should include a discussion of impacts to bats and pygmy rabbits as mentioned above. PA. 23-10

Part B. Description of Proposed Project, Alternatives and Scenario for Analysis of Cumulative Impacts

Page B-4 and B-17

Table B-2 - The developed acreage of the proposed Alturas Substation presented in Table B-2 is stated to be "13 acres (approx. 790 x 760 feet fenced, plus access road and 3 feet outside fence)". Please correct the table to show that the total disturbance at this site is approximately 16 acres. PA. 23-11

Page B-10

B.2.2.1 Proposed Route and ROW Characteristics, Route Refinement Process, second paragraph - Details regarding the informal rating system used by the Aspen team to determine the relative sensitivity of the resources mapped along the proposed ROW were not included in the DEIR/EIS. The final EIR/EIS should provide the criteria by which the "relative sensitivity" of a species was determined (see comments below under Section C.3.1.2.1.1, pages C.3-49 and C.3-50). PA. 23-12

Page B-29

2.3.3 Transmission Line Construction, first paragraph - The DEIR/EIS states that construction of the transmission line would include the permanent installation of an estimated 730 structures. The document does not state how many of each particular structure (single pole, H-frame, and 3-pole angle structures) is required. Each structure will have a related impact area for foundation excavation. The 3-pole angle structures will have an additional surface impact for guy installation. The DEIR/EIS does not provide enough details to estimate the amount of surface disturbance that will occur from structure installation alone. Please identify the type of structure, the number to be installed and the minimum/maximum area of surface removal that will occur for each structure type (preferably in acres). PA. 23-13

Page B-32

Table B-3 - The construction of new, permanent and temporary access routes will result in both surface removal and disturbance to vegetation communities. Table B-3 and the text on pages B-29 and B-33 do not provide information quantifying the amount of surface removal or disturbance to vegetation associated with construction or enhancement of access routes. The final EIR/EIS should describe the number of proposed access routes, their length, and provide a quantified estimate to the number of acres which will be PA. 23-14

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Four

impacted by surface removal or disturbance. Similar calculation should be done for staging areas. These estimates should be incorporated into the total estimate of acreage impacted by surface removal and/or disturbance for the proposed project. PA. 23-15

Page B-34

Table B-4 - Table B-4 lists the estimated number of hillside crane landings yet the total number of landings is not summarized. Surface removal estimates of hillside crane landings clearly do not include the cut or fill areas associated with the landings. Surface removal from landing construction activities on an acreage basis are not provided in the text.

Please provide an estimate of the number of hillside crane landings, the number of acres which will be impacted by surface removal or disturbance (including cut slope and fill or side cast) and the area disturbed to create access to the pad including access road cut slope and fill or side cast. These estimates should be incorporated into the estimate of acreage impacted by surface removal and/or disturbance for the proposed project. PA. 23-16

Page B-35

Structure Erection - A landing of 50 x 100 feet will result in a surface impact of approximately 0.1 acre. This clearly does not include the cut or fill areas associated with this landing. Depending on the slope of the hill, this could potentially double or triple the area of disturbance. It is not clear if crane landings will be restored following construction. The total estimates of surface impacts should be presented in the final EIR/EIS. The crane pads and all access roads should be bladed back to original contour and completely restored. This will reduce the loss of habitat and negative visual impacts as well. PA. 23-17

Conductor and Shield Wire Installation - Please define the term "sockline". PA. 23-18

Page B-39

Site Restoration - The Department generally discourages the use of fertilizers in reclamation/restoration efforts in this area due to the potential for the fertilizer to enhance the establishment of weedy species on the reclaimed sites. PA. 23-19

Page B-49 and B-50

B.3.3.2 Project Alternatives Analyzed in the EIR/EIS, third sentence - NEPA also requires the "No Project Alternative" or similar alternatives to be evaluated. PA. 23-20

Pages B-53 to B-59

B.3.4 Alternatives Eliminated from Further Consideration - The Department has reviewed the rationale for elimination of alternate routes presented in the DEIR/EIS. Many of these routes are being eliminated based on suspected, undetermined, biological impacts. No biological surveys have been performed along these proposed routes, therefore, it is unknown whether the biological impacts associated with these alternatives would be greater, less than or equal to the selected route. PA. 23-21

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Five

Alturas Ridge Routes
Eastern Madeline Plains Alternative Alignment
Western Madeline Plains Alternative Alignment
Realignment North of Honey Lake
East Side of Peterson Mountain Range Routes

PA. 23-21

Page B-55

Realignment East of Ravendale, Rationale for Elimination - We fully understand the safety concern being considered in removing this alternative from further consideration, the statement that "A clearance of several miles is required around the heliport for flight safety..." is not consistent with FAA requirements or with other heliports in the State. This alternative is biologically superior to that of the proposed project and clearance for safe helicopter operation can be achieved using this alignment. The vague safety standard of "several miles" does not exist. A more detailed assessment of flight safety should be completed including such factors as prevailing winds and established flight pattern. To our knowledge, no specific information has yet been presented to justify the elimination of this alternative. The Department requests the route be considered until a detailed flight assessment and biological surveys are completed.

PA. 23-22

Page B-81

B.4.3 No Project Alternative - "No Project Alternative" should address the effects of No Project, not another similar project somewhere else at a later date. Increased efforts toward conservation in the proposed service area are not discussed as an alternative to the project. Please incorporate a "no project" no project alternative.

PA. 23-23

Part C.1 Introduction

Page C.1-2

C.1.2 Assessment Methodology, third paragraph - Please refer to comments listed under Section C.3.2.1.1 (pages C.3-49 and C.3-50) below regarding "significance criteria" and categories developed to assess environmental impacts of the proposed project. The final EIR/EIS should identify the basis by which "pre-determined, specific significance criteria" were developed and their relationships to CEQA.

PA. 23-24

C.2 Air Quality

Page C.2-3

C.2.1.2 Existing Environment, Climate, top of page - Please check the spelling of "Hidy and Kliaforth". Under C.2.3 References (page C.2-21) "Hidy" is spelled "Hiddy". The Department thinks "Kliaforth" should be spelled "Klieforth".

PA. 23-25

C.3 Biological Resources

Page C.3-10

Table C.3-2 - The header for the third column has a footnote number, but there is no corresponding footnote attached. In the same column for northern juniper woodland, *Townsend's* *solitaire* is misspelled.

PA. 23-26

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Six

Regarding Wildlife Habitat Type, Northern Juniper Woodland, is *Plecotus townsendii* really "characteristic" of junipers?

PA. 23-27

Regarding Wildlife Habitat Type, Sagebrush, Passerine birds, is the lark sparrow common in this habitat and what about the horned lark? Winter uses of this habitat type should be included in this column.

PA. 23-28

This table is misleading as "Typical representative" species are not necessarily presented and the typical habitat uses list is incomplete and cursory.

PA. 23-29

Page C.3-12

Aquatic Habitats, general comments -

1. There are references to a contingency plan in the erosion control plan for any unanticipated failures. The erosion control plan is not available for review.

PA. 23-30

2. Several springs within the proposed general alignment support populations of a currently undescribed species of the genus *Pyrgulopsis*, a hydrobiid snail that has been recommended for candidate status under the Federal Endangered Species Act. These springs are in the Long Valley, Duck Flat and the Smoke Creek desert area. There are also populations of fingernail clams, *Pisidium ultramontanum*, a Federal Candidate 2 present in several springs in the area.

PA. 23-31

3. The ROW for the proposed project diverges from the Tuscarora alignment in many areas, however, the DEIR/EIS only discusses the results of survey work performed for the Tuscarora project. Apparently, no fish, amphibian or reptile surveys were conducted away from the Tuscarora project ROW.

PA. 23-32

4. The Erosion Control Plan has not been submitted with the draft and therefore the Department cannot evaluate the generalities stated in this document.

PA. 23-33

Page C.3-14

Wetlands - Specific montane meadow wetlands and stream crossings along the Alturas transmission line ROW which will be affected by construction activities are not clearly identified in the text. Specific wetland areas and stream crossings along the proposed ROW in need of evaluation include but may not be limited to:

Segment A - meadow systems adjacent to the North Fork of the Pit River and the Pit River crossing itself;

Segment C - riparian corridors along Crooks Canyon, Stones Canyon, and Dry Creek and ephemeral wetlands west of Little Bald Mountain;

Segment K - large wetland system in the Madeline Plains;

Segment L - riparian and wetland complex at the north end of Secret Valley;

Segment R to Segment T - wetlands located near Red Rock Canyon just east of Long Valley Creek;

PA. 23-34

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Seven

Segment W to Segment B - numerous wetland systems along Long Valley Creek just north of the Bordertown substation;

Segment X - multiple stream crossings along the north and east side of Peavine Peak near Reno, Nevada.

PA. 23-34

Page C.3-24

C.3.1.1.3 Rare, Threatened or Endangered Species, Special Status Plants, second full paragraph - In the first sentence, please list the seven special status plant species. In the second sentence, please list the two special status plant species. In the third sentence, please list the two special status plant species.

PA. 23-35

Page C.3-24 and C.3-25

C.3.1.1.4 Special Habitat Management Areas - The DEIR/EIS lacks any descriptions of unique community types that are intersected by the ROW. Unique plant community types (such as silver sage basins and clay flats, just to mention a few) intersected by the ROW should be addressed in the Final EIR/EIS. Mitigation measures should be developed for these unique communities.

PA. 23-36

Page C.3-25

Biscar Wildlife Area - The Biscar Wildlife Area is used by sage grouse for nesting and brood rearing and the adjacent meadows and uplands provide extensive habitat.

PA. 23-37

Third paragraph, last line - Please replace Canadian with Canada.

PA. 23-38

Page C.3-26

Table C.3-4 - Pronghorn need to be removed from the table as it is not a C2 special status species. Bald eagle and northern harrier should be put above Swainson's hawk to agree with American Ornithologists Union checklist order. Table E 1-2 on page E 1-9 needs the same correction.

PA. 23-39

Page C.3-28

C.3.1.2.2 Wildlife, second paragraph - The mule deer and pronghorn antelope information is incomplete. For example, Segments T and W cross mule deer migration corridors and mule deer winter range. Migration corridors, fall deer holding areas, winter ranges and pronghorn kidding grounds are well documented by the Department. The local offices of the Department should be contacted for this information. Please refer to general comments listed at the beginning of this letter.

Information presented in the DEIR/EIS addressing milepost (MP) location and acreage estimates on and adjacent to the ROW, alternative alignments and substation areas for deer and pronghorn antelope habitats are not complete. Locations of deer and pronghorn winter ranges, deer fall holding areas, pronghorn antelope kidding grounds and migration routes are well documented by the Department but the information has not been incorporated either in the text or maps in Appendix C. Mitigated constraints on project activities are not specific to milepost location. The following suggestions are intended to augment this information.

PA. 23-40

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Eight

Proposed Route

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
0.4		4.3	3.9
9.5		15.8	6.3
71.0		90.3	19.3
130.5		151.7	21.2

Antelope

Winter Range - No construction activities should occur on antelope winter ranges during the period of November 1 through March 31.

Restricted Area - November 1 through March 31

Milepost	through	Milepost	Miles
0.0		1.5	1.5
7.5		9.2	1.7
14.1		22.6	8.5
74.1		94.4	20.3

Kidding Grounds - No construction activities should occur on antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
0.2		0.8	0.6
15.7		19.5	3.8
37.7		40.8	3.1
63.3		65.7	2.4
74.3		74.6	0.3
87.6		89.0	1.4

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
0.0		3.1	3.1
5.2		8.9	3.7
12.8		15.6	2.8
14.7		20.9	6.2
36.7		42.6	5.9
46.3		48.0	1.7
62.0		66.8	4.8
73.0		75.7	2.7
85.6		86.8	1.2
86.5		90.8	4.3

PA. 23-40

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Nine

B Alternative Segment

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
B1.4		B1.6	0.2

Antelope

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
B2.1		B4.6	2.5

D Alternative Segment

Antelope

Kidding Grounds - No construction activities should occur within one-half mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
D8.0		D8.5	0.5
D8.8		D9.6	0.8

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
D7.1		D10.1	3.0
D8.9		D11.7	2.8

F Alternative Segment

Antelope

Kidding Grounds - No construction activities should occur within one-half mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
F1.7		F3.2	1.5
F5.3		F6.4	1.1

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

PA. 23-40

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Ten

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
F1.1		F3.8	2.7
F4.6		F7.2	2.6

G Alternative Segment

Antelope

Kidding Grounds - No construction activities should occur within one-half mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
G1.5		G4.1	2.6

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
G1.0		G4.6	3.6

H Alternative Segment

(no map provided)

J Alternative Segment

Antelope

Kidding Grounds - No construction activities should occur within one-half mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
J13.9		J16.1	2.2
J15.7		J16.5	0.8

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
J 4.9		J 6.4	1.5
J13.4		J16.5	3.1
J15.2		J16.5	1.3

ESVA Alternative Segment

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

PA. 23-40

Ms. Julie Halligan
Mr. peter Humm
June 6, 1995
Page Eleven

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
ES1.3		ES23.1	21.8

Antelope

Winter Range - No construction activities should occur on antelope winter ranges during the period of November 1 through March 31.

Restricted Area - November 1 through March 31

Milepost	through	Milepost	Miles
ES7.3		ES23.1	15.8

Antelope

Kidding Grounds - No construction activities should occur within one-half mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
ES 5.5		ES 7.7	2.2
ES12.5		ES15.8	3.3
ES19.1		ES22.8	3.7

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
ES13.3		ES15.1	1.8
ES19.6		ES22.3	2.7

M Alternative Segment

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
MO.0		MO.3	0.3

Winter Range - Flyovers should not be conducted over deer winter ranges at less than 1,500 feet above ground level during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
MO.0		MO.3	0.3

PA. 23-40

Ms. Julie Hulligan
Mr. Peter Humm
June 6, 1995
Page Twelve

Antelope

Winter Range - No construction activities should occur on antelope winter ranges during the period of November 1 through March 31.

Restricted Area - November 1 through March 31

Milepost	through	Milepost	Miles
MO.0		M3.6	3.6

Kidding Grounds - No construction activities should occur within one-half mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
M1.9		M3.4	1.5

Kidding Grounds - No blasting should occur within one mile of antelope kidding grounds during the period of April 15 through June 30.

Restricted Area - April 15 through June 30

Milepost	through	Milepost	Miles
M1.3		M3.6	2.3
MO.0		MO.4	0.4

P Alternative Segment

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
P3.3		P17.4	14.1

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
SO.0	S3.8	3.8	

U Alternative Segment

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
UO.0		U2.1	2.1

PA. 23-40

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Thirteen

Z Alternative Segment

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
Z0.0		Z4.5	4.5

PA. 23-40

WCFG Alternative Segment

Deer

Winter Range - No construction activities should occur on deer winter ranges during the period of November 15 through April 15.

Restricted Area - November 15 through April 15

Milepost	through	Milepost	Miles
WCFG0.0	WCFG4.1	4.1	

Table C.3-5 - Sandhill cranes may be nesting adjacent to Segment L in Secret Valley as a pair was recently observed (March, 1995) in the meadows there. This area certainly represents potential sandhill crane habitat and a nesting pair was documented in this area by Tuscarora project consultants in 1994. Please correct this cell of the table. PA. 23-41

Listing sage grouse brood habitat acreage under the columns titled "Potential Sage Grouse Brood Habitat" and "Sage Grouse Leks and Brood Habitat" is confusing. Based on a conversation with Ms. Patricia Mosley of Woodward-Clyde Consultants, the Department suggests the columns be titled "Sage Grouse Brood Habitat" and Sage Grouse Leks". The new column titles would require the data presented in Segment C, the 27 acres of brood habitat currently listed under "Sage Grouse Leks and Brood Habitat" would need to be moved over under the new column "Sage Grouse Brood Habitat". For Segment L, "Sage Grouse Leks and Brood Habitat" please indicate that the 167 acres include both actual leks and good lek habitat. PA. 23-42

Wintering sage grouse habitat are not listed. Impacts to this habitat component are frequently cited in the literature as potentially limiting to populations and should be included in this analysis. PA. 23-43

The table should include nest sites for loggerhead shrikes which were located within the proposed route ROW on Segments C, O, Q, and W (as well as alternative Segments P and V). PA. 23-44

Page C.3-31

Third paragraph - The text states that "potential" brood rearing habitat occurs in or along Segments C, E, K, L, and N. Known brood rearing habitat also occurs in Segments E and K. Active leks approximately two miles from the proposed route at Segment L indicate that nesting and brood rearing habitat should be considered as occurring there also. Table C.3 - 19 (page C.3-125) lists brood rearing habitat as occurring in Segment A, but this is not reflected in the text. PA. 23-45

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Fourteen

Last paragraph - The "pasture" habitats identified in this section are primarily wetland systems. The pasture habitats in this section should be changed to herbaceous wetland community types. PA. 23-46

Page C.3-32

Section C.3.1.2.3, Special Status Species, first paragraph, third sentence - These three species should be listed by name in this sentence along with their California Native Plant Society (CNPS) listing code. PA. 23-47

Fourth sentence - The CNPS List 3 species referred to here is *Scutellaria holmgreniorum*. It is currently being treated by CNPS as a 1B species and the most recent evaluation of field data led to the proposal to place this taxon on the 1B list. In subsequent sections *S. holmgreniorum* is treated as 1B (e.g., page C.3-45). A more direct reference to it here as 1B would result in more consistent treatment. PA. 23-48

Page C.3-33 and Page C.3-34

Table C.3-6 - *Arnica fulgens*, not *Arnica sororia*, is most commonly found in meadow/seep habitats. Biosystems and Woodward-Clyde consultants primarily found *Arnica sororia* in Western Juniper Woodland habitat types. The habitat listed in the table for twin arnica should be corrected to reflect this. PA. 23-49

Page C.3-33 and Page C.3-34

Table C.3-6 and Table C.3-7 - Please add the alluvial fans to sagebrush scrub as habitat for *Pedicularis centranthera* (Segment L). PA. 23-50

Please review those taxa for which "Vernal clay flat" is listed as the habitat. It is too broadly applied here and not suitable for *Camissonia alyssoides* ssp. *boothii* nor *Lomatium ravenii*. PA. 23-51

Page C.3-35

Special Status Wildlife Species, first paragraph, fourth sentence - Please replace word "calculated" with "collected". PA. 23-52

Page C.3-35

American White Pelican, second sentence - The last breeding record within the vicinity of the proposed project was in 1976, not 1986. PA. 23-53

C.3-36

Western Least Bittern, top paragraph, last sentence - Please provide the reference that indicated least bitterns nest in the Modoc Plateau Region. PA. 23-54

Swainson's Hawk, last sentence - This sentence seems to be a composite of two incomplete sentences. The meaning of a nest perching on power poles is certainly unclear. PA. 23-55

Golden Eagle, last sentence - This sentence is not complete. PA. 23-56

Page C.3-36 and C.3-37

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Fifteen

Bald Eagles (*Haliaeetus leucocephalus*) - In addition to noting that bald eagles winter in the Warm Springs Valley which is crossed by the proposed project, this section should also identify the Madeline Plains and Honey Lake Valley as bald eagle wintering areas which are also crossed by the proposed project. Fish are the only forage item identified for bald eagles but forage items also include waterfowl and rodents. PA. 23-57

Page C.3-37

Sage Grouse (*Centrocercus urophasianus*) - This section should address the value of leks as vital elements in the life cycle and maintenance of sage grouse populations. The distinctions between lek, nesting, and brood rearing and wintering habitat seem to have become blurred in this treatment. These separate uses of adjacent habitat should be described, and the potential impacts to these respective habitat functions should be discussed. Impacts to any one of these components could cause declines in sage grouse populations and the project could cause ongoing mortality (wire collisions) or displacement of sage grouse. PA. 23-58

Greater Sandhill Crane, first sentence - As the proposed project goes nowhere near Siskiyou County, we presume Sierra County is meant. PA. 23-59

Page C.3-40

Short-eared Owl - The discussion of this species is too brief and incomplete. Please indicate if any were found. PA. 23-60

Page C.3-42

Special Status Reptiles - One western pond turtle was reported in the pools in lower Deep Cut Creek in 1994. PA. 23-61

Page C.3-43

Spotted Bat (*Eudorma maculatum*), Mastiff Bat (*Eumops perotis californica*), and Pallid Bat (*Antrozous pallidus*) - These sections indicate that field surveys were conducted. No information is provided as to general areas, time frames, and scope of surveys, or if the field surveys were specifically for bats or were conducted in conjunction with other surveys. Detailed information as noted above should be included in this section. PA. 23-62

Page C.3-44

Pygmy Rabbit - A pygmy rabbit report of July 18, 1994, by Messrs. Jackman and Cull of Biosystems near MP 91.8 (Segment N) should also be noted here. PA. 23-63

Bighorn Sheep - It is commonly accepted that bighorn sheep have been extirpated from their range in Lassen and Modoc counties. PA. 23-64

Badger - Badgers are known to den in the vicinity of the south extent of the East Secret Valley Alignment. PA. 23-65

Page C.3-45

Alturas Volcanic Gravels, first sentence - Pyroclastic rocks are not restricted to "gravel-sized" fragments, they may be any size rock fragments. PA. 23-66

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Sixteen

Volcanic Vertisen Low Sagebrush Scrub, last sentence on page - Please correct "wit" to "with". PA. 23-67

Page C.3-49

C.3.2.1.1 Significance Criteria, Vegetation - The criteria by which these guidelines were developed is not clear. The final EIR/EIS should provide the criteria and references by which these guidelines were developed (i.e., Mandatory Findings of Significance [Section 15065 of CEQA Guidelines], [Public Resources Code Section 21083] etc.).

The final EIR/EIS should include a bullet for "a reduction in numbers" of special status plants (i.e., rare or endangered plants - see Sections 15065 and 15380 of CEQA Guidelines). It appears as though impacts that are mandatorily significant under State regulations have been arbitrarily determined to be insignificant by rigid use of criteria developed for this project only. The Department requests that the appropriate criteria contained in the CEQA Guidelines be used as the criteria for determining significant impacts. PA. 23-68

Page C.3-50

Wildlife - As with vegetation, the significance criteria by which these guidelines were developed is not clear. The final EIR/EIS should provide the criteria and references by which these guidelines were developed (i.e., Appendix G of CEQA Guidelines, or mandatory findings of significance, [Public Resources Code Section 21083] etc.). PA. 23-69

Page C.3-52

Bottom of Page - Upon checking the list of special status plant species that will be avoided and cross-referencing to appendices E1 and E4, it was determined that half of the species listed have populations impacted. The following species and the number of populations that will be impacted are as follows:

Species	Populations Impacted
Arnica sororia	5
Erigeron elegantulus	3
Eriogonum prociduum	4
Lupinus uncialis	3
Stanleya viridiflora	2

The populations of these species cannot be considered avoided until Sierra Pacific has committed to do so and the project descriptions have been changed to reflect such avoidance. We were disappointed to discover this gross inaccuracy in the document despite efforts to provide early information and our failed attempts to participate in your siting exercises with Sierra Pacific. We request a review of all tower and access road data to increase the accuracy of this section. PA. 23-70

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Seventeen

Page C.3-53

Table C.3-9 - This table lists habitat loss in two categories: temporary and permanent. On page C.3-56, third paragraph and following bullets, impacts are discussed in terms of immediate, short-term, long-term and permanent. It is not clear how the categories on page C.3-56 relate to those of Table C.3-9. PA. 23-71

The potential exists for project-related nonnative plant introduction throughout the project area, yet this table indicates that some habitats/resources are immune to this threat. PA. 23-72

Many plant species were omitted from this table despite the potential for direct or indirect impacts. Apparently these species are omitted because it is assumed they will be avoided; however, avoidance is a mitigation option and species or populations that are expected to be avoided should be listed. Even though avoidance is planned, there may still be potential impacts to these species along this segment if slight routing changes are made or other deviations, which are unknown at this time, are required. Plans to mitigate impacts through avoidance may require monitoring to ensure that populations are not adversely affected. The Department suggests that a table of mitigation options be developed for each species that may be impacted. The mitigation options should include, but not be limited to, avoidance, restoration and monitoring, off-site compensation, etc., (see CEQA Guidelines). In the development and recommendation of mitigation options, particular attention should be given to impacts that are long-term due to maintenance of the transmission line. PA. 23-73

Maps of the populations of special-status plant species indicate that many populations will be affected by construction activities. It is critical that appropriate mitigation plans be developed for each impacted species. These mitigation plans must be complete and detailed and the Department requests that they be submitted for approval not less than 60 days prior to construction. Detailed mitigation plans should include the following: PA. 23-74

1. the results of preconstruction surveys that:

   a) document plant population areas extent
   b) estimate numbers of individuals in population
   c) determine potential off-site reference sites for postconstruction monitoring

2. a restoration strategy that outlines:

   a) plans for propagule salvage
   b) methods of propagule storage, if salvaged
   c) planting schedule
   d) planting methods
   e) critical aspects of each species biology and ecology that are relevant to restoration

3. a monitoring strategy that discusses:

   a) data to be collected
   b) methods of data analysis and presentation
   c) specific populations to be monitored
   d) off-site reference plots to be monitored
   e) monitoring schedule

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Eighteen

   f) complete definitions of success criteria to be met during restoration
   g) realistic estimates of expected success each successive year
   h) final success criteria to be attained at end of restoration period

4. contingency plans for restoration failure

   a) plans to compensate for partial success
   b) plans to compensate for complete failure
   c) realistic estimates of feasibility of off-site compensation

PA. 23-74

This section should include a discussion of any planned or performed follow-up and/or preconstruction surveys. As spring and summer of 1994 was a dry year, the size and extent of documented plant populations very likely did not reflect their potential size. Several annual species that may not have been located on the ROW in 1994 may be documented in 1995. In those regions where construction is planned for spring 1996, preconstruction surveys must be conducted in spring 1995 and specific plans made to accurately survey these populations for flagging prior to construction.

Where avoidance from both construction activities and overland travel have been chosen as the key mitigation action, the draft EIR/EIS should include specific contingency measures (both on-site and off-site) for impacts to sensitive plant populations. Mitigation may include an attempt to restore populations or off-site compensation. Where restoration efforts fail, off-site compensation should be used. Off-site compensation measures will need to be quantitative and shall be subject to approval by the Department. Specific species of interest include: *Atriplex gardneri* var. *falcata*, *Dimerosia howellii* (Segment C), *Erigeron elegantulus* (Segment K), *Eriogonum collinum*, *Eriogonum prociduum*, *Eriogonum robustum*, *Lupinus uncialis*, *Pedicularis centranthera*, and *Stanleya viridiflora*. This information is buried in Appendix E under the individual listings for each taxon but also should be summarized here. PA. 23-75

Based on the information we have it appears that the following taxa need to be included in this table: PA. 23-76

<u>Segment A</u>

Lupinus uncialis
Eriogonum prociduum

<u>Segment C</u>

Dimerosia howellii
Lomatium ravenii
Arnica sororia
Scutellaria holmgreniorum

<u>Segment E</u>

Arnica sororia
Scutellaria holmgreniorum
Lomatium hendersonii
Astragalus agrestis

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Nineteen

Segment K

Lomatium hendersonii
Erigeron elegantulus
Eriogonum collinum

Segment L

Atriplex gardneri var. falcata
Hackelia cusickii
Pedicularis centranthera
Stanleya viridiflora

Segment O

Camissonia minor
Eriogonum nutans var. nutans

Segment X

Eriogonum robustum

Segment Y

Eriogonum robustum

However, it is not clear that all data are included in the DEIR/EIS. Clearly the East Secret Valley alternative has not even been surveyed at this time and therefore the potential impacts and mitigation measures cannot be fully disclosed to the public at this time. As stated above, there is need to completely rework the section and check for completeness and adherence to State regulation in determining significant impacts and mitigation measures. PA. 23-76

Page C.3-56

First full paragraph - Where avoidance from both construction activities and overland travel have been chosen as the key mitigation action, the final EIR/EIS should include specific contingency measures (both on-site and off-site) for unanticipated impacts to sensitive plant populations. Restoration should be used where feasible. Off-site compensation measures will need to be quantitative and subject to approval by the Department. Specific species of interest include *Atriplex gardneri* var. *falcata*, *Dimorosia howellii* (Segment C), *Erigeron elegantulus* (Segment K), *Eriogonum collinum*, *Eriogonum prociduum*, *Eriogonum robustum*, *Lupinus uncialis*, *Pedicularis centranthera*, and *Stanleya viridiflora*. PA. 23-77

Page C.3-64

C.3.2.2.2 Specific Environmental Impacts and Mitigation Measures - Vegetation, General Comment - The erosion control plan and the restoration plan have not been submitted with the draft and therefore the Department cannot evaluate the generalities stated regarding each of these documents. PA. 23-78

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Twenty

Page C3-65

Impact 1 and Table C.3-10, first two columns - The methodology describing how the approximate acreage for temporary or permanent loss of plant community types was derived is not clear. The development of calculations for off-site acreage compensation is dependent upon this initial estimate. The final EIR/EIS should include the methodology for this estimate and values should coincide with totals listed earlier in the text. PA. 23-79

Page C.3-70

B-2, second paragraph, fourth sentence - Please correct this sentence to read "If such equipment creates ruts in excess of 6 inches deep and over 100 feet in length, the vertisol soil shall be deemed...". PA. 23-80

Page C.3-72 Holmgren's Skullcap, fourth sentence - This species is considered to be a CNPS 1B taxon, not CNPS 3. Earlier references in this DEIR (e.g., page C.3-45) have recognized this. This species should be handled as a 1B species in this discussion. PA. 23-81

Raven's Lomatium, last sentence - Please replace "Cusick's stickseed" with "Raven's lomatium". The sentence should also be changed to state that no specific mitigation is proposed for impacts to Raven's lomatium. PA. 23-82

Page C.3-77

B-5, first paragraph, fourth sentence - Restoration to preconstruction conditions are always desirable unless an opportunity for improvement exists (see general comment for B-4 above). PA. 23-83

Second paragraph - Mitigation Measure B-5 should include specific contingency measures (both on-site and off-site) for special status plant species that "do not meet the preestablished success criteria two years after construction". It may be to Sierra Pacific's benefit to implement contingency measures prior to the five-year monitoring period. PA. 23-84

Page C3-79

Mitigation Measure B-6 - The final EIR/EIS should specifically state that, during all phases of construction, access roads and the ROW will be completely blocked to prevent unauthorized vehicular traffic. In addition, all access roads located in previously inaccessible areas should be completely blocked to all postproject vehicular access. Mitigation Measure B-6 should be amended to address this. PA. 23-85

Page C3-82, C3-83, C3-85 and C3-86

3.2.2.3 Impact 1, 2, and Table C.3-12, first two columns - The methodology describing how the approximate acreage for temporary or permanent loss of plant community types was derived is not clear. The development of calculations for off-site acreage compensation is dependent upon this initial estimate. The EIR/EIS should include the methodology for this estimate and values should coincide with totals listed earlier in the text. PA. 23-86

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Twenty-one

Page C.3-87

Impact 3: Loss of Sage Grouse Brood Habitat - Effects on sage grouse nesting, brood rearing and winter habitat by the proposed transmission line are not confined to the area directly under the line or the area disturbed by the tower bases. Thus, the acreage described in Impact 3 are likely much greater than stated in the DEIR/EIS, and Mitigation B-11's assessment of .0059 acre of lost brood rearing habitat would be much too small. PA. 23-87

Page C.3-90

Impact 6: Disturbance to Special Status Wildlife Species and Habitats - It would be beneficial to have a more detailed discussion, either in the text or a table, of the perceived impacts of the project to sensitive or listed wildlife. For example, nowhere is it listed how close the sandhill crane nests or Swainson's hawk nests are to the line and therefore one cannot fully evaluate how effective the mitigation measures will be. PA. 23-88

Page C.3-92

Table C.3-13 - The avoidance period for Swainson's hawk is complicated. Your statement on page C.3-90 that DFG protocols will be followed in addition to the buffers in the table is appropriate. We feel that the buffers in the table should represent the maximum amount of sensitivity, however, we recommended in our biological opinion for the Tuscarora Project that no construction activities occur within one-half mile of an active nest from April 15 to August 1. This differs from the dates in our protocol (written six months earlier) to Woodward-Clyde Associates, but was based on further discussions with experts in Swainson's hawk biology. The protocol is being rewritten to allow certain activities at other times and distances with appropriate monitoring but the figures that should appear in the table are: construction, 4/15-8/1, 0.5 mile and foot traffic, 4/15-8/1, 200 yards. PA. 23-89

In the same table, the same conditions should apply to the Alturas project for peregrine falcon as to the Tuscarora project. This restriction is, no construction prior to May 15 without a nest monitor present. That would change the buffer distance to 1.5 miles. There is no mention anywhere of sensitivity of this project to prairie falcons, which are probably the most sensitive raptor when it comes to nest disturbance. They should be added to the table with an avoidance period of 3/1-6/30 and a distance of 1 mile. Again, a protocol for working inside these parameters with a nest monitor present will be prepared. PA. 23-90

Page C.3-93

Impact 7: Direct Mortality to Wildlife - Direct mortality of ground nests, especially sandhill crane and sage grouse nests, should be accounted for and mitigated. PA. 23-91

Page C.3-98

Impact 13: Increased Predation on Ground-Nesting Birds, Small Mammals, and Waterfowl - Increased predation by raptors on pygmy rabbits should be specifically mentioned in this discussion. PA. 23-92

B-22 - Please require perch guards be installed on Segment N due to the presences of sage grouse and pygmy rabbits. PA. 23-93

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Twenty-two

Page C.3-99

C.3.2.3 Cumulative Impacts and Mitigation Measures, Vegetation - Under projects considered and their locations, please correct "Ski Resort/Golf Course, less than one mile west of U.S. 395 in Long Valley/Balls Canyon area..."(Not Falls Canyon). PA. 23-94

Page C.3-100

First complete paragraph - Special status plant species affected by both the Tuscarora Pipeline and Alturas Transmission Line projects are not represented in the text. The draft EIR/EIS only lists six species, whereas a total of 17+ special status species are affected by both projects. Affected species that were not listed include: *Arnica sororia, Atriplex gardneri* var. *falcata, Camissonia minor, Dimorosia howellii, Erigeron elegantulus, Eriogonum collinum, Lomatium ravenii, Lupinus uncialis, Mimulus pygmaeus, Pedicularis contranthera, Psoralidium lanceolatum, Scutellaria holmgreniorum* and *Stanleya viridiflora*. The final EIR/EIS should include a comprehensive list of all special status plant species affected by the proposed project and the total number of populations affected (not individuals) on a per species basis. PA. 23-95

Page C.3-101

Wildlife - Cumulative effects for wildlife habitat will include off-site mitigation measures for short-term, long-term and permanent effects due to restoration failure. PA. 23-96

Page C.3-106

Table C.3-17 - References to loks in relation to the proposed route and alternatives should also specifically address sage grouse wintering, breeding, nesting and brood rearing habitat. PA. 23-97

Page C.3-107

Table C.3-18 - A very small and potentially very vulnerable population of sage grouse exists adjacent to Segment WCFG on Hallelujah Wildlife Area. The note stating "No wildlife resources affected" under Segments S, U, Z, WCFG and X-east segments is incorrect for these segments. PA. 23-98

Page C.3-113

Wildlife Resources, third paragraph - Additional details on the "...probable greater impacts.." should be supplied, especially for mule deer, pronghorn, badger and sage grouse habitats.

This paragraph also suggests that these unquantified greater impacts would be due to greater amounts of surface disturbance and a relative increase in human presence (relative to Segment L). While these factors would be involved, the East Secret Valley Alternative provides much higher quality upland habitat on a year-round basis to numerous special status species than that found in Segment L. Thus, impacts to habitats there would be more detrimental. PA. 23-99

C.3.3.5 Wendel Alternative, C.3.3.5.1 Environmental Setting - Alternative Segment M holds historic and potential sage grouse and pygmy rabbit populations less than or equal to one mile west of Alternative Segment H, at MP 1.5. PA. 23-100

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Twenty-three

Page C.3-115

C.3.3.6.2 Environmental Impacts and Mitigation Measures - Discussion of impacts other than just cumulative impacts to the Doyle Wildlife Area should be included here. PA. 23-101

Pages C.3-121 to C.3-127

C.3.5 Mitigation Monitoring Program - Mitigation monitoring will require a well-developed plan describing in detail the monitoring program organization and operation, monitoring tasks, reporting and corrective actions protocol. The mitigation monitoring plan should include the following specific points:

(1) The "Introduction" section should include the plan overview, authority and purpose, and list related documents;

(2) Monitoring program organization and operations should include: an organization chart, table of roles and responsibilities, agency coordination, training (both internal and training with other resource agencies), communications (during normal daily operation and after-hours notification); documentation and reporting schedules (daily, weekly, progress reports, documentation of noncompliance, notification of resource agency for noncompliance activity). PA. 23-102

(3) Monitoring tasks should be specific and include an outline for compliance monitoring and tracking that will address the key areas of activity, tracking mitigation measures and schedule. Monitoring tasks will identify preconstruction deliverables, preconstruction surveys and flagging, construction monitoring (rare plant avoidance, etc.), and postconstruction monitoring for restoration, erosion control and maintenance inspections.

Page C.3-125

Table C.3-19 - Monitoring in sage grouse nesting/brood rearing habitat should include avoidance of nests and disturbance/harassment of broods. PA. 23-103

The location of pygmy rabbits near Alternative Segments N and M should be included. PA. 23-104

Page C.3-127

Perch guards should be placed wherever vulnerable special status prey species occur now, not just where predatory birds now occur. Predatory birds occur throughout the project area and would be drawn to new hunting perches. PA. 23-105

Part C.6 Geology, Soils, and Paleontology

Part C.7 Hydrology

General Comment - Little discussion of potential impacts on springs is included in this section. This topic should be covered in the text and in Table C.7-3. PA. 23-106

Ms. Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Twenty-four

Wetland systems listed as biological resources in Table E-4 are not addressed in this section. Site-specific locations of wetlands will need to be identified. Please review comments pertaining to wetland on page C.3-14 above. PA. 23-107

Part C.8 Land Use, Public Recreation, and Educational, Religious, or Scientific Uses

In the evaluation of the WCFG alternative (Page C.13.65), it also appears that angle point WN06 is closer to US 395 than is necessary. The visual impacts of the WCFG alternative at this location could be reduced by moving that angle point further east away from US 395. PA. 23-108

Part D. Comparison of Alternatives

Page D-8

D.3.1 Alturas Area Alternative Segment B Versus Proposed Project Segment A - In reviewing Segment A and Alternative Segment B, the project analysis of the potential for raptor collisions would indicate an increased potential for impacts due to the fact that Segment B is crossing a larger wetland. For this same reason there would also be a greater potential for impacts to cranes and bald eagles. PA. 23-109

Page D-11

Section D.3.4 East Secret Valley Alignment Versus Proposed Project Segment L, last bullet - The greater impacts on biological resources are not confined to "particularly big game habitats" in the ESVA. Sage grouse, badgers, loggerhead shrikes would be affected. PA. 23-110

Part E. Additional Long-Term Implications

Page E-3

E.3.3 Potential Growth-Inducting Effects - The growth inducing influences of the Balls Canyon Ski Resort project needs to be adequately addressed. A substation at Bordertown makes the potential for this project, which encompasses over 6,000 acres, quite attractive. This project has the potential for significant adverse impacts on the biological resources of the area and could degrade the values of the State's Hallelujah Junction Wildlife Area. Sierra Pacific has indicated that it has no desire to provide a substation for such a project and has indicated that costs for an appropriate substation are very high and would make such a project quite infeasible. The Department feels that a ski resort, golf course and the associated amenities that the developer has suggested to Sierra County would make such a capital outlay quite reasonable. Growth inducement of this project should be addressed in the final document. PA. 23-111

Part F. Proposed Mitigation Monitoring, Compliance and Reporting Plan

General Comment - Proposed mitigation monitoring compliance and reporting plan (MMCRP) - The MMCRP outline and mitigation table are too broad in scope and generalized to ensure compliance during the proposed project implementation. The mitigation monitoring plan should follow the specific recommendations presented in review comments for Section C.3.5 listed above. Preconstruction plans listed under item 3 will need to provide specific compliance criteria for each of the identified resources for the final Ms. PA. 23-112

Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Twenty-five

EIR/EIS. Items 1 through 6 currently lack the specificity needed to assess the adequacy of the monitoring plan. A more precise mitigation monitoring plan should be developed for the final EIR/EIS. PA. 23-112

Page F-5

General Reporting Procedures, last sentence - The Department should be added to the list of recipients who receive written reports. The Department requests that copies of the environmental inspector's daily field reports be submitted weekly by facsimile to our office in Redding. In addition, the Department requests immediate notification of any condition found by the environmental inspectors to be a violation of environmental specifications. PA. 23-113

Page F-7

Mitigation Monitoring Program Table, Introduction of nonnative plant species (Class II) - The "Effectiveness Criteria" addresses erosion and not nonnative plants. PA. 23-114

Page F-8

Mitigation Measure B-10 - Measure should include Segment O. PA. 23-115

APPENDIX E.1 Biological Resources

Page E.1-1

Introduction - Please note that Mr. Syd Kahre's location is Region 2 (Sacramento Valley-Central Sierra Region), not Region 1 (Northern California-North Coast Region). PA. 23-116

Page E.1-13 and E.1-14

Table E-2 - Pronghorn need to be removed from the table as it is not a C2 special status species. Bald eagle and northern harrier should be put above Swainson's hawk to agree with American Ornithologists Union checklist order. See comments as for Page C.3-26. PA. 23-117

Page E.1-45

Prairie Falcon and American Peregrine Falcon - The discussion on prairie and peregrine falcons needs to be expanded to include mitigation for impacts to nesting birds during construction, not just impacts from powerline collisions. PA. 23-118

Page E.1-58

Several springs within the proposed general alignment support populations of a currently undescribed species of the genus *Pyrgulopsis*, a hydrobiid snail that has been recommended for candidate status under the Federal Endangered Species Act. These springs are in the Long Valley, Duck Flat and the Smoke Creek desert area. There are also populations of fingernail clams, *Pisidium ultramontanum*, a Federal Candidate 2 present in several springs in the area. PA. 23-119

Ms. Julie Halligan
Mr. Peter Humm
June 6, 1995
Page Twenty-six

Thank you for the opportunity to comment on this document. If you have any questions regarding these comments, please contact Mr. Jim Nelson, Region 1 Natural Heritage Supervisor at (916) 225-2315.

Sincerely,

John Turner, Chief
Environmental Services Division

cc: Mr. Richard L. Elliott
Department of Fish and Game
Redding, California

Dr. Gary H. Meunier
Vice President, Environmental Assessment
Aspen Environmental Group
Agoura Hills, California

Mr. Steve Kellogg
Woodward-Clyde Consultants
Oakland, California

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TA, TS, TL, TR

COMMENTS FROM PUBLIC HEARING TRANSCRIPTS

CACD - Ms. Halligan

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGE RICHARD CAREAGA, presiding.

Transcripts - Alturas

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JUN 01 1995

In the matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.

Application 93-11-018

REPORTER'S TRANSCRIPT

Alturas, California
April 17, 1995
Pages 1 - 65
Volume 1

Reported by: Maureen Buckley Inchauspe

H.C. Kaufman, Jr., Official Reporter
PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

I N D E X

STATEMENT OF:	PAGE
MR. BARAGER	11
MS. FLOURNOY	16
MS. CANTRALL	19, 54
MR. FERGUSON	22
MR. STAHL	27
MR. KRAUEL	31, 58, 63
MR. ANDERSON	39
MR. ARMSTRONG	45, 56, 62
MS. CLARK	50
MR. DEES	60
MR. DUNN	64

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

A

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGE RICHARD CAREAGA, presiding

* * * * *

In the Matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.	Application 93-11-018

APPEARANCES: (Prehearing Conference, February 6, 1995)

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ALTURAS, CALIFORNIA, APRIL 17, 1995 - 6:00 P.M.

* * * * *

ADMINISTRATIVE LAW JUDGE CAREAGA: Good evening, ladies and gentlemen. My name is Richard Careaga. I'm an administrative law judge for the California Public Utilities Commission.

This is the time and place appointed and noticed for a public hearing to receive oral comments on a draft environmental impact report and statement concerning the proposal of Sierra Pacific Power Company to construct a high-voltage overhead power transmission line from here near Alturas to Reno, Nevada.

The application number assigned by the Commission to this proposal is A. 93-11-018. Commissioner Knight is the assigned commissioner for the Commission.

And the Bureau of Land Management has assigned Case No. CACA-31406 to the proposal.

BLM is working with the California Public Utilities Commission to prepare this joint environmental impact statement, environmental impact report that assesses the environmental impacts of the proposed 345 kv transmission line.

This public participation hearing provides you the opportunity to make oral comments on the draft environmental impact report and statement that's been prepared jointly by the Public Utilities Commission and the BLM.

2

The BLM, in accordance with the Federal National Environmental Policy Act, is going to consider and respond to all oral and written comments, and that will be part of the preparation of a final environmental impact statement and report.

The BLM and other federal agencies will use this final report as a basis for their decisions to either approve or deny the application by Sierra Pacific for its transmission line right-of-way across federal lands.

The federal agency decisions will be coordinated with the decision that the California Public Utilities Commission will be making.

Now this meeting is going to be stenographically recorded by the court reporter, and the transcript of the meeting is going to be a very important part of the record on which the Public Utilities Commission will be basing its decision. They will be basing their decision on two things.

They will be looking at the final impact report and seeing if it adequately complies with the requirements of the California Environmental Quality Act. And they will as well be considering the significant environmental impacts that the report may describe in deciding whether or not to grant permission to construct the project.

Therefore, it's very important that the transcript accurately record what you have to say here

3

tonight, and for this reason I'm going to ask your help in a number of ways.

First, and we are all guilty of this, I'll ask you to speak slowly. Now I may give you a hand signal if I think you are going faster than I think the court reporter can take your testimony, and if it's necessary, I'll interrupt and ask you to slow down.

Second, of course, I'm going to ask everyone to speak one at a time. If you do need to talk to each other, please step outside and do so. There will be plenty of time for everybody to be heard.

I'm going to ask that you limit your initial comments to three to five minutes to begin with until whoever wants to has had a chance to talk, and then if anyone else has something to add after that, we'll continue as late as is reasonable.

And fourth, we are going to take regular breaks, probably around ten minutes before the hour, to give the court reporter a break and everybody a chance to stretch their legs, or when the court reporter needs to change the paper in the machine, if that's necessary.

And when I say "off record," that means we have stopped recording. When I say "on record," that means we are recording again.

Now I want to remind you that you don't have to speak here tonight, for those of you who are terrified of public speaking. I don't expect that that

1 takes in very many of you, but if you want to comment,
2 you can do so in writing by postmarking your comments
3 before May 3rd and mailing them to the address in the
4 environmental report. Or Julie Halligan -- Julie, raise
5 your hand -- who is the project manager for the Public
6 Utilities Commission, can give you the address.
7 Also, I should introduce the project manager
8 for the BLM, Peter Humm, on my left.
9 Now please be aware that this public hearing
10 is to gather information about the environmental effects
11 of the proposed project. The most helpful contribution
12 that you can make tonight is to point out facts and
13 issues in the environmental impact statement that may
14 have been overlooked or inadequately addressed.
15 If you have questions concerning the report
16 and the data, the analysis and conclusions, a
17 representative of the Aspen Environmental Group, the
18 independent consultant that prepared the report and
19 statement, and Julie Halligan, who is the project
20 manager, will be available to take questions after we've
21 given everyone the chance to make their comments.
22 Now there will be another hearing on the
23 proposed project next month on May 22, 1995, beginning
24 at 9:00 a.m. I'll conduct evidentiary hearings on the
25 proposed project in Susanville at the City Hall Council
26 Chambers, 62 North Lassen Street. Those hearings will
27 continue either until May 26th or until completed.
28 The purpose of the hearings next month is to

1 take the testimony of the project proponent, Sierra
2 Pacific, and others concerning whether the project is in
3 the public interest.
4 At the beginning of those hearings there will
5 be another opportunity for public comment. Anyone who
6 wishes will be permitted to make a concise statement
7 that supports or opposes without the necessity of filing
8 proposed testimony in advance.
9 Now these statements won't be under oath, and
10 they won't be sworn testimony. The Commission may
11 consider the statements in reaching its decision, but it
12 won't rely upon them in order to reach the findings of
13 fact and conclusions of law in its ultimate decision.
14 At those hearings, any member of the public
15 may also participate as what we call an interested party
16 -- in court you'd call it a litigant -- by filing on or
17 before May 4th, 1995, a written motion with the
18 Commission describing the issues that you wish to
19 address and describing the extent of the planned
20 participation, or you can attend the meeting and
21 formally appear.
22 You may, but you are not required to, be
23 represented by an attorney. If you appear as an
24 interested party, you may introduce sworn testimony,
25 which must be filed on or prior to May 4th, and
26 cross-examine witnesses, present sworn rebuttal
27 testimony in writing or in person, and make written
28 arguments concerning the applicable law and its

application to the evidence by filing formal briefs.

Your participation, if you choose to participate in that formal court-like proceeding, will be governed by the formal rules of evidence.

Now tonight's procedure is not governed by rules of evidence. It's governed by rules of democracy and common sense.

I'm here to help things move along and to see that everybody has a chance to be heard.

Following the completion of the final environmental impact report, the Commission will determine if the project as described and as assessed in the report itself meets the form and substance required by the California Environmental Quality Act.

The Commission won't decide upon granting permission to construct the project or an alternative project until after it has certified the final environmental impact report and statement. Depending on the results of that final statement, the Commission may be required to reach specific findings concerning significant environmental impacts of the project prior to approving it.

Now I think you can all see that the most obvious question about the proposed transmission line is why a project that is needed primarily to meet projected growing needs in the Reno-Sparks area is being routed through California rather than through Nevada.

The environmental report considered and

rejected the alternative routes in Nevada that are admittedly capable of meeting the applicant's main objectives. And the reason that these were thought to be not preferable to the project were that the additional capacity that's projected would be needed in two years, sooner than some of these alternatives could be built.

Two, the alternatives would all have to traverse congested urban areas.

And three, no information is available that would show that alternative routes in Nevada would necessarily create fewer significant environmental effects. No explanation is provided, however, why the immediate requirements could not be satisfied by construction of a 120 kv line from the East Tracy substation to the Silver Lake substation along an existing utility corridor other than to observe that a required 2,000 foot separation distance to be infeasible.

No explanation is offered as to why no alternatives were requested that would avoid congested urban areas in Nevada. And the report contains no specific discussion other than the following significant environmental effects of the proposed project as routed through California compared to alternative routes through Nevada.

First among these effects are the disturbance to the context, setting, feeling, or association of

significant cultural resource sites. Placing the transmission line as far as possible from these still leaves significant effects.

Does the draft report adequately consider alternative routes for the transmission line that would disturb fewer cultural resource sites or a comparable number of resource sites of perhaps lesser significance and cultural importance?

Second, the proposed siting would result in the degradation of residential land use environment along much of the length of the project because of the permanent change in the character of the land uses. Although the effects can be reduced by siting structures at least 300 feet, some residences would still be located less than 300 feet from the centerline.

Does the draft report adequately consider alternative routes for the transmission line that would affect fewer existing residences?

The third according to the report is the proposed site would degrade recreational land uses for some because of the proximity and the change in character.

Another question then is does the draft report adequately consider alternative routes for the transmission line that would affect fewer residential, recreational areas or recreational areas that are less intensively used?

Fourth, the crossing of many roads and

railroads creates the potential for the disruption of transmission corridors in the event of an accident.

Does the draft report adequately consider alternative routes for the transmission line that would cross fewer or more lightly used roads and rail lines?

Fifth, is the impact on scenic quality, which is a significant effect for which no mitigation measure is available, does the draft report adequately consider alternative routes for the transmission line through areas whose scenic quality is less susceptible to degradation?

Sixth are the related effects on the scenic quality of views from the Tule Patch Spring Rest Stop and Highway 395. Same question can be asked, whether alternatives are available that would traverse rest stops and roads that are less traveled.

Finally, according to the report, the proposed siting of the transmission line would not significantly affect air quality, biological resources, land and water resources, public health and safety, transportation and traffic, social conditions and other environmental aspects after taking into account the mitigation measures that are proposed.

Therefore, the final question is whether there are facts that show that the proposed siting of the transmission line would in effect create significant effects on those other aspects of the environment that can't be made insignificant through mitigation.

The purpose of posing these questions is to demonstrate some of the issues that should be considered in the final impact statement to make certain that it is as complete as possible and provides an adequate basis for the Public Utilities Commission to discharge its responsibility of weighing the environmental pros and cons. You will probably have others.

If the final report continues to identify significant environmental effects over the environment that cannot be substantially mitigated, the Commission must find that specific overriding economic, legal, social, technological or other benefits of the project outweigh the significant effects on the environment.

Next, I'm going to be taking speakers from the cards that have been collected. If you'd like to speak and you haven't yet filled out one of these pink cards, please do so.

And I apologize in advance if I mispronounce your name. If I misspell your name for the court reporter, please spell it correctly. And thank you again for your help.

We will go off record for a second.

(Off the record)

ALJ CAREAGA: We will be on record.

There was one question concerning whether comments would be restricted in terms of expressing preferences or dislike of the project on such factors as not wanting to look at the transmission line, and the

answer was there would be no such restrictions.

The first person who has signed up to speak is Ron Barager, B-a-r-a-g-e-r. And if you could speak from the podium next to the court reporter so that she can hear you, sir.

STATEMENT OF MR. BARAGER

MR. BARAGER: My name is Ron Barager -- pretty close. My wife and I own property about eight miles south of town near the power line project.

Should I submit a copy of my -- what I'm going to say also in writing?

ALJ CAREAGA: We will be glad to receive that if you'd like to.

MR. BARAGER: Okay. To begin with, I'm opposed to the power line project and think it's another form of Modoc victimization, the Melvin Carter syndrome, as they say: Put the power line in the wilderness rather than where people are. However, that's not what my proposal is, and I'll just read it right from the paper.

"Dear Project Lead Personnel,

"This letter is to submit a proposal for a minor route adjustment to the Alturas Transmission Line Project between mileposts 8 and 17. We own property in Wildlife Estates, less than one mile to the east of the proposed route (parcel #022-450-21). Sierra

TA 1-1

Pacific Power Company's projected alignment of the transmission line in this area would have several detrimental impacts on up to as many as 24 privately-owned properties between mileposts 8 and 17.

"Beginning near milepost 8, at Angle Point A06, the powerline would cross 2 parcels owned by Ralph and Katharine Wessinger [parcel] (#022-190-39, 022-370-29). Mr. Wessinger has stated that his private airstrip would be rendered inoperable by the project alignment. Grant Prankhurst [I'm not sure that he's here tonight], the project field supervisor for [Sierra Pacific], agreed with this assessment [in the] (telephone call from him to us on 3/14/95).

"Continuing southward, the transmission line would transgress the viewscape of several of the 19 privately-owned properties in Wildlife Estates. Then near milepost 14, the line would pass within 1300 feet of parcel #022-310-20, owned by Vernon and Jo

TA. 1-1

Knoch. Mrs. Knoch stated that she had submitted a route adjustment proposal several months ago but received no response from the CPUC. Farther south, between mileposts 14 and 15, the alignment proposed by [Sierra Pacific] would cross 2 parcels (022-310-21, 022-310-17) owned by John Hancock Mutual Insurance Company and managed by Lyneta Farms.

"Our proposal to adjust the transmission line route between mileposts 8 and 17 would eliminate physical encroachments on all of the above-mentioned private properties. It would mitigate viewscapes and other concerns for as many as 24 private parcels, while not significantly impacting any other privately-owned lands to the west of the project.

"Beginning near milepost 8, approximately 2/10ths of a mile north of Angle Point A06, at Angle Point [what I would call star] *A06, redirecting the route a few degrees westward would cause it to miss the

TA. 1-1

Wessingers' properties.
Mr. Wessinger stated that the impacts to his landing strip would be minimized if the powerline ran on the west side of a knoll just beyond his western property line. Continue this adjusted alignment for 1 3/10ths miles to Angle Point *C01. Turning southward at Angle Point *C01 would direct the powerline up a draw not visible from either Wildlife Estates or from Cal Pines properties to the west. About 2 5/10ths miles from *C01 a new Angle Point *C02 would be located on the western edge of a plateau. At this *C02 we propose heading [south-southeast] for 5 2/10ths miles, to Angle Point *C03. Here the line would rejoin [Sierra Pacific's] route.

"This adjustment would put the powerline entirely on BLM lands, missing the Knoch property by 1 mile and the Lyneta Farms properties [entirely]. It would not involve any extra angle points and would incur an additional distance of

TA. I-1

approximately 1/10th of a mile.

"The Bureau of Land Management is charged with the stewardship of much public land in Modoc County. We submit that a public project such as the Alturas Transmission Line should utilize and impact public lands rather than private property wherever possible. Some extra effort expended now to rectify the above-mentioned problems is worthwhile as this transmission line will be with us for a very long time.

"Enclosed is a map of the portion of the project we have concerns with, including our proposed route adjustments. We have hiked and mountain biked extensively over the affected areas and would be willing to spend time in the field discussing our ideas.
Sierra Pacific Power Company must undertake a project of this scale with the utmost consideration for all concerned. Thank you for your consideration of our proposal."

ALJ CAREAGA: Thank you, Mr. Barager.

TA. I-1

Maps are at the end of the Alturas Transcipt

16

MR. BARAGER: And here's a map that shows my ideas on it right here.

ALJ CAREAGA: Thank you.

We will be off record.

(Off the record)

ALJ CAREAGA: We will be on record.

The next speaker is Lorraine, L-o-r-r-a-i-n-e, Flournoy, F-l-o-u-r-n-o-y

STATEMENT OF MS. FLOURNOY

MS. FLOURNOY: I'm a terrified speaker and I talk too fast anyway, so I'll try and slow down.

I'm opposed to the line altogether. There are alternate routes that could have been taken, I'm sure. I'm here as more a registered nurse and a property owner, business owner, and I feel that this project will affect me in all other areas.

The first thing I'm concerned about is risk to my children. A friend just sent me another packet of information about the health risks of EMFs. And I know the power companies seem to think it's safe, and our government, but all the private party studies, scientific studies say that it's not safe, or they are not sure. They close certain areas of schools and other buildings and wouldn't let the children enter. So it seems obvious they are -- they know that there is some risk. TA. 2-1

And where this power line is going, we turn our heifers and bulls out there, and they would be right TA. 2-2

17

under this power line. And this could affect their -- possibility of affecting their fertility. And that would put us out of business. We need to have replacement heifers. We need to have them all bred. TA. 2-2

The other thing I'm concerned about is economics. It changes every time I talk to them, but specifically the kind of ground they are going to be digging in, it's close to our springs. Our whole ranch is irrigated with those springs. If it interrupted the water flow at all, we would be on a salt flat. Completely out of business.

And this ranch has been in my husband's family for over 125 years. And by interrupting that water and if it's damaged in any way, we are done for.

We also have sturgeons that require that. PA. 2-3 Warm water springs is a perfect environment. No matter what the temperature, the sturgeons can survive only if -- by the water that we have. And again, it's dependant on the water that we have on our property.

They say that it won't affect our water, that drilling that close to the spring, but they can't say for sure. They don't know. Once it's done, it's done. And if we are out of business, nobody seems to care. I mean this multi-million dollar ranch, like I said, has been in the family for over a hundred years. So we don't want to lose it. My husband is thinking of passing it down to the children.

It makes me angry. When I first started

talking to the power company and then I started pointing out that people aren't each one of those dots. And I think we are important, all of us here, and it bothers me that they don't think we are.

Environmentally, I think it's going to affect our environment. We don't live in the city. We live here because we can see the mountains. We can see the thundershowers without looking at power lines. We can see the stars at night. We don't want to look from here to Reno at this horrible, ugly line.

There are already other corridors that are available. They don't need to bother us.

I understand that one of the most common causes of death of birds are those power lines. And yet I have a list as long as my arm -- my mother-in-law is a bird watcher -- of endangered birds that are here that nest often on our property, either bald eagles and sandhill cranes and all kinds of birds that are supposedly supposed to be protected. TA. 2-4

I think if this power line is built, our property values are going to go down. This million-dollar ranch does -- I mean we have got a gas line coming one end, power line at the other end. If we ever did want to sell, it would be worth nothing. TA. 2-5

And like I said, if the water is damaged in any way, we are out of business. We will be on a salt flat. We won't have any green meadows. There will be no wildlife for us.

The other thing that makes me really angry is that private property has been in the family for years and years. We have no say. The gas line is running through the land. The power company is going to run over us. I'm really angry. I don't want to do something crazy. If I didn't have kids, I would.

I don't want them there, and we just don't seem to have any rights as property owners.

And the other thing is that it is going to be terribly ugly, and I don't want to see it for the rest of my life. I don't want my kids to see it. Thank you.

ALJ CAREAGA: Thank you.

The next speaker is Patricia Demick, D-e-m-i-c-k, is it Cantrall?

MS. CANTRALL: Cantrall, pronounced as if it had a "U" instead of an "A."

ALJ CAREAGA: But it's C-a-n- --

MS. CANTRALL: -- -t-r-a-l-l.

ALJ CAREAGA: Thank you.

STATEMENT OF MS. CANTRALL

MS. CANTRALL: First I'd like to read a letter, your Honor, that I have written to the Commission and then make a few more statements.

To whom it may concern:

When all is said and done, the final fact remains this: None of us need to look at electric lines or towers to gratify the whims and overbuilding of Reno, Nevada, or anywhere else. If Nevada needs the power and TA. 3-1

we don't need it, let Nevada have the lines.

Modoc County does not need more power, but we are in the position of having our landscape and, as Mrs. Flournoy said, our private property ruined for the benefit of some cities. People live in cities and in our county because they choose to do so in each area.

We didn't make our attic into an upstairs so that we could have a better view of the proposed power line route. We built it for additional room and to have a better view of Old Saddleback Lake and Tule Lake Mountains.

TA. 3-1

With all our modern technology, power lines should be put underground as are most cables of any kind now.

Our children plan to retire here in two years when their 20 years in the United States Navy is up. They have lived in cities in this state, in these United States, and abroad, but they choose to come home to retire because of the beauty and the quiet of Modoc County.

Let your cities continue to look like cities, but leave Modoc County alone, and let us continue to enjoy an uncluttered and open landscape.

Now I would like to ask if any of the people considering this -- your Honor, I don't know if you can answer this -- have ever been to Modoc County.

ALJ CAREAGA: As I indicated, we'll take questions when everyone has had a chance to talk.

MR. CANTRALL: Okay. Well, if people who will be considering this project have not been in Modoc County, I do not feel they have the right to decide the fate of people here whether we are very few compared to the population of Reno, Nevada, or not. I don't think it is their business to decide our fate, and I hope that that will be entered into the record.

As to the expense to Sierra Pacific, if it's going to cost more to run the route through Nevada, tough cookies. They are the ones that want to sell power to Reno.

Like I say, it's not going to benefit us. And I think if Nevada wants the power, they ought to have the line, because as we all know, once these power lines have been put in and the corridor established, they can keep building outward and outward and bringing more power lines through. And we do know that. So instead of one power line maybe 35 or 75 feet wide, we could be looking at thousands of feet down the road.

But so long as cities are allowed to build, your Honor, and expand where they do not have adequate resources, where they do not have water or power, this scenario will be repeated again and again.

And as to groundwater, Dr. -- a registered geologist of Van Nuys, California, he is also on the Governor's seismic safety commission and has been the state geologist many times in the past, says we very well could possibly lose some of our springs or our

TA. 3-2

ground water because of earthquake faults. And any drilling might send this off in a different tangent.

Our well also is close to the Flournoys' by about a mile and a half, is down 167 feet, and in an underground river. Should there be seismic activity, we could lose that. Should there be massive drilling, we could lose that.

TA. 3-2

But I do thank your Honor for allowing me to speak tonight. But I hope you will remember, all of you people who consider this, that we are very few in population up here, but we have just as many rights as Reno, Nevada, does. Thank you.

ALJ CAREAGA: Thank you.

The next speaker is Jimmie -- is it initial "R" Ferguson, F-e-r-g-u-s-o-n?

MR. FERGUSON: That's close enough.

ALJ CAREAGA: Thank you, sir.

STATEMENT OF MR. FERGUSON

MR. FERGUSON: On several occasions I have had the opportunity to talk about this project. I'm against it. And the reason I'm against it is because being a private land owner, the reason I moved to Modoc County is that I owned a ranch in Redding, California. And two years after I bought this ranch, a power line company came across and put a line three miles across my ranch down there.

Well, I was only married a short time then, and my wife said, well, let's fight the power line

company, because they can't do that.

So we hired an attorney and we fought the power line company till we were about broke. And the judge finally took me in his chamber and said, Jim, there is no way that you can beat this power company. They are going to put this power line near your ranch, and there is nothing you can do to stop it.

So we sold out and moved to Modoc County, and we bought a ranch that has a panoramic view of everything in Modoc.

I live on a hill, and when the power line company, people on this power line project, they came out in force to talk to me, because somehow they found out that I fought the other power line company with all the vigor that my life would fight them and I lost. And so they wanted to come out and see if they can make a deal with me that I wouldn't fight them quite as hard.

And they were all standing up on my ranch and without exception they all said, golly, Jim, wouldn't it be awful to let a power line go across the whole panoramic view of your ranch.

I said, yeah, it would be awful, so let's build it someplace else. Let's put it in the desert or something like that.

Well, we'll see what we can do. Well, they said what they could do all right. Segment A and B of the power line comes through my ranch from two angles. So I can't really say let's have a different location

for the power line.

Like the first gentleman, unfortunately, my ranch is a mile wide and three miles long again. So A and B come right down through the middle, exactly through the middle of my ranch.

I have invited Julie out to look at my ranch on several occasions, and she said that if she had time she might do that some day. To date I haven't seen anybody.

And again my wife said, well, let's fight these suckers. So we hired a local attorney here in town, and we brought the power company back up from Reno three or four times. And three or four different times the judge gave them a hundred percent of what they wanted.

They did require that they put up a $100,000 bond in case they did some damage to my property. And I asked my attorney, I said, well, how would you ever prove they ever did any damage to my property?

And he said that's just a piece so you'll quit yelling about their power line.

Now they said that -- you said that the power line companies should not take into consideration the major highways, panoramic views, railroads, Pit River, and another road. So the way they have it on my property anyway fronts at Highway 299, goes across the Pit River, goes across the railroad tracks, goes across Centerville Road on to the Wessingers' airfield down the

right-of-way.

So -- oh, and I have bald eagles. I have every conceivable wildlife. And my wife, we have seven sons. My wife will not let them come on my ranch and shoot any geese, any ducks, any antelope. She said if you guys want to go shoot something, go buy your own damn ranch. No, sir. That's what she does to my sons. Think what she would do to anybody who -- she would politely tell them where to go. TA. 4-1

Now the judge did tell me that the power line company had to notify me each and every time that somebody was going to come in and do all that investigation work. They are just going to investigate my land till -- dig holes in it and do all kinds of things.

Well, three guys called me. The power line guy called me telling me that a helicopter was going to fly over to survey my property so they will know exactly where they are going to put the power line.

And then another guy called me. He said, I want to check your land for bats. Yeah, we think you have an endangered bat. TA. 4-2

I said, well, what about the bald eagles. We are not concerned about them? They are not going to be extinct very much longer anyway.

So this power line now is designed to go right down through the middle. He couldn't put it on the property line. Right straight in the middle of my

26

ranch.

And I'm kind of thinking they did it, to be honest with you -- I have testified to this already -- I think the power line company did it because they know there is nothing I can do about it, and the fact that I'll spend the money for attorneys to fight them. I have already lost every case so far, and they know that.

So I know that my wife has stopped writing checks to attorneys. She said if you want it, it's not going to come out of the joint account.

After two lawsuits, you'd think that I'd catch on and not want to spend money on attorneys. And so those are the reasons that I'm against it.

I'm not against power per se. I know we have to have power, but when the power company picked the worst -- they couldn't have picked a worse A and B segment. They wanted to put it across a golf course. Segment A goes across the golf course. Segment B goes across the most open span place in the west side of town. It just happens to be in my ranch, but if it was somebody else's, I'd be up here saying the same thing. And so that's where they want to put this power line.

As a matter of fact, they made pictures of my ranch. Almost all of those pictures are of the -- they made pictures for me to try to calm me down.

Could I make a suggestion?

ALJ CAREAGA: Well, first, I wonder if we could let

27

some others speak and then we will take this in turn.

Thank you very much.

Marie Roberts had filled out a card but indicated that she didn't wish to make an oral comment, so we'll go on to -- is it Rod Cameron?

MR. CAMERON: I have nothing to say. Just listening.

ALJ CAREAGA: Thank you, sir.

Mr. Don Stahl, S-t-a-h-l.

Mr. Stahl

STATEMENT OF MR. STAHL

MR. STAHL: Correct. My name is Don Stahl. I live in Alturas, and I am opposed to Sierra Pacific's preferred routing for many reasons. I'll go through a few of the things that I have down here.

The impact of the proposed Sierra Pacific line on many animals, for instance, raccoon, beaver, the horned lizard, rubber boa, rattlesnake, water snake, wood rat, weasel, trout, bass, hermit thrush -- and those are found on Likely Mountain -- robbin, magpie and raven and others, they were not considered in the DEIR/EIS. TA. 5-1

Although none of those animals are on the T and E list, many of them are fully protected by law and others are controlled with seasons of take and bag limits.

Sandhill cranes are an endangered species and declining in numbers. Therefore, it is extremely TA. 5-2

important that no more are lost.

The DEIR/EIS provides for certain safeguards and additional habitat acquisition as mitigation. But there is no way to assure that any cranes will use a new area. In fact, it is very doubtful. I don't know how you can get it across to a wild animal that he's supposed to nest over here when he has been nesting here for generations. TA. 5-2

Furthermore, marking lines to make them more visible to birds has shown only an average 45 percent reduction in mortalities. And besides the Pit River area where the line crosses, cranes are regularly observed on the Madeline Plains. There is quite a chance for loss down there.

The DEIR/EIS on the Pacific Power Company Alturas transmission line project did not give proper consideration to the visual impact the proposed power line would have on fishermen, hunters and other recreationists using Viceroy Pond, Delta Lake, Bayley Reservoir, Graven Reservoir, Juniper Stock Tank, Nelson Corral Reservoir, Smith Reservoir and other Bayley Reservoir down at Madeline and the surrounding areas. TA. 5-3

These waters are not only heavily used by local anglers and waterfowl hunters, but by large numbers of people from throughout the state. The surrounding areas are also widely used by deer hunters and other recreationists. Although a photo simulation was made near Bayley Reservoir and Delta Lake, it was

mentioned in connection with aquatic habitat. There is no indication that the study was aware of the existence of the other waters, let alone their great recreational value.

I use all of these areas myself and I enjoy the wide open spaces, and I don't want to be out there -- every time I go fishing, don't want to have to look at these power lines. TA. 5-3

We had a small power line put in by the reservoir northwest of Canby, and it went right by one of the popular fishing reservoirs. And every time you go fishing there, you have to look at that ugly thing, and that's only for the towers.

The DEIR/EIS states there would be 12 miles of new access roads and 32 miles of upgraded roads. This is unacceptable. Once these roads are in place, there is no way they can be effectively closed.

People with 4-wheel-drive vehicles will get around any barrier that is constructed. The area along the proposed line cannot withstand any additional pressure on its wildlife. TA. 5-4

Further, although there would be safeguards against introducing noxious weeds during the construction phase, there can be no safeguards against recreationists importing noxious weeds on their vehicles, clothing or pets.

The impact of EMF on hatching success of ground-nesting birds, such as sand hill cranes, sage TA. 5-5

grouse and others, is not addressed and is apparently unknown. If EMF can cause leukemia in children, it may also prevent eggs from hatching or cause deformities in the hatchlings. TA. 5-5

The maps of the proposed route are entirely inadequate. Roads are not identified and some prominent features are not shown. Just one of these is Viceroy Pond.

Another example is on Map 4 of 33 where the road to Bayley Reservoir is shown dead-ending near the north end of Segment C, when in fact the road continues to Bayley Reservoir and on to Delta Lake. TA. 5-6

The many omissions and the vagueness of the maps did not give people a chance to see just where the proposed line would actually go and therefore denied them the opportunity to make objections they might otherwise have made.

One of the greatest impacts of the proposed power line route is the visual impact. One of the greatest assets the Alturas area has to offer is our wide open spaces and great views. The preferred routing would totally destroy the beautiful view looking west to Mount Shasta from Alturas, and coming into Alturas from the west it would destroy the fine view of beautiful Warner Mountains. TA. 5-7

The recreational value of the area to the south would be greatly reduced because the preferred route is all in a prime hunting area and goes near many TA. 5-8

popular fishing waters. TA. 5-8

The Nevada route would have an impact on a lot fewer people. It would have far less visual impact and far less impact on wildlife. Although the Nevada route is supported by the U.S. Forest Service, BLM, California Department of Fish and Game, Auduborn Society, Sierra Club and many others, this route has not been seriously or properly considered by Sierra Pacific. Thank you. TA. 5-9

ALJ CAREAGA: Thank you, Mr. Stahl.

The next speaker is Nenette, N-e-n-e-t-t-e, Barager.

Did you wish do speak?

MS. BARAGER: I decline.

ALJ CAREAGA: Okay, thank you.

You'll need to help me on this. Mr. Tom Krauel, K-r-a-u-e-l

STATEMENT OF MR. KRAUEL

MR. KRAUEL: My name for the record again is Tom Krauel. And I'm a resident of Alturas.

I think probably the prevailing comments that we are hearing, are going to continue to hear tonight, are primarily the visual aspects and the impacts on the residents of Modoc County and a discussion of utility corridors and why the current utility corridor is not being used in this project. TA. 6-1

I think the two kind of go hand in hand in that if there were existing utility corridors and if these corridors were earmarked for particular projects,

there wouldn't be any surprises. For this project, however, no existing utility corridors are considered at least in the segment going through Modoc County. And therefore it's all new to us, and it's quite a surprise.

A year ago I stood in front of the PUC and verbally discussed the importance of the utility corridors. Over a year ago myself and others in writing have discussed the importance of utility corridors.

We feel that new utility corridors should not be created unless they are absolutely necessary. And then these corridors should be created through only appropriate long-term studies and not just the whim of one power company who is trying to find the shortest, cheapest route. Until then it seems only logical that existing utility corridors be used or at least parallel existing transmission lines.

This isn't a real new concept. I think everybody is pretty much in agreement on this as far as Northern California goes any way. Most counties have indicated that existing utility corridors be used. The U.S. Forest Service indicates that existing utility corridors be used. The BLM indicates that existing utility corridors should be used. Sierra Club supports this.

A year ago we locally circulated petitions to the same effect, that existing utility corridors should be used, and we have accumulated several hundred

TA. 6-1

signatures, and that was presented a year ago to the PUC and to the BLM.

The Planning Commission of Modoc County last Friday, three days ago, also lent credence to the same concept that they oppose the first seven miles by unanimous vote of both Section A -- Segment A and Segment B due to the visual and biological impacts that they did not feel were properly addressed in the draft EIR.

Now they realized in their discussion that creation of this utility line would have a tendency to attract future utilities, thus creating a corridor. And they believed that there were not enough long-term studies to designate this area as a new utility corridor.

Now the Western Regional Corridor Study supplied a map. This was produced by somebody who also worked on the draft environmental impact requirement, Michael Clayton Associates, in 1992. And this map shows at that point, 1992, was about the time that Sierra Pacific was conceptualizing the project. Sierra Pacific did have access to this map, and this shows potential utility corridors and shows some idea of maybe where these corridors should go.

It's not going to make a lot of sense to you from there, but Alturas is right here (indicating), and where the proposed project goes is right there. There is no study or there's no indication that an existing

TA. 6-1

34

corridor or that a corridor be proposed for this area at all.

And it's interesting that there seems to be such blatant disregard for trying to use existing utility corridors. It's logical that they should be used. I think that would alleviate an awful lot of the problems that we are hearing tonight.

And if I knew I had an existing utility corridor next to my property, I think maybe I would expect a power line sometime in the future. But when I buy property, when I build a house under the umbrella of the general use plan and zoning, I feel like I'd like to be protected somewhat throughout that. TA. 6-1

And for the Public Utilities Commission to just blatantly supersede all the regulations that our lives are built on doesn't seem quite right.

So consequently, again I don't believe that that is something that's been addressed appropriately in the draft EIR, because this discussion was brought up in very timely fashion over a year ago. And that is the aspect of utility corridors.

The visual aspect, I think, is -- the visual aspect is something else that's very dear to all of us. As far as the impacts on Modoc County, the visual aspect would be severe. TA. 6-2

There are three very, very sensitive areas. Infernal Caverns is a sensitive area down at the south end of Modoc County. The crossing of the Pit River is a

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

35

very sensitive area, and Dagger Canyon, the north end, is an extremely sensitive area. TA. 6-2

Infernal Caverns was addressed, and it was recognized as a sensitive area. The mitigation, however, I don't feel is appropriately taken into account and addressed in the draft EIR in that the mitigation primarily involves land swap and trails and interpretive type things leading up to this famous battleground.

Now this battleground is in basically pristine nature. There are no roads that go to the Indian battleground, and it's well preserved.

Now my interpretation of mitigation is to reduce impacts. The way I interpret what's offered as mitigation is actually accumulating impacts, because in essence what you are doing is not reducing the impact, because we are increasing the many number of people that would be going into the area through the use of interpretive trails. TA. 6-3

Now that may be all well and good to BLM. It may provide more jobs, but it's certainly not going to produce the effect of protecting what they are trying to protect.

Dagger Canyon is another very sensitive area. That route was in my opinion approved inappropriately in that Sierra Pacific has extensively stated how prior to January of 1994, there has been extensive research on how the routes were determined. And as far as routing

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

goes, Sierra Pacific hired Resource Management International in early 1993 to help look for routes. Bio-systems Analysis then stepped in, PRN Bio Services. It's all quite routed towards what types of processes were gone through in determining the proper route. And yet Segment B at that time was the proposed route.

Now that was presented to the public in January of 1994, and within a few hours Segment A developed out of that process.

It's unfortunate, I believe, that Segment A came about in this way, and I think that that casts some shadow of a doubt on the routing in general of the whole project as the scoping meeting that was called to order in January, the end of January 1994, was basically to bring up the project and show the proposed route to the public.

Now this was a real emotional meeting, as was to be expected, and the other thing that can be expected is that basically everybody was drawing lines on the map, and out of that meeting came Segment A.

Now that's fine, and I think you can understand the human emotion that surrounds this, but to change a route so suddenly because of such an emotional frenzy I don't think is very representative of how well the routing is done for a project. And in essence, that application was accepted by the CPUC in February 14th, which was only a couple of weeks after this perfect project was proposed to the public.

So I think there is some doubt as far as the routing process overall. I think that, in summary, as far as utility corridors go, I think it stands to reason that everybody is in agreement that utility corridors should be used, that this project will produce a utility corridor, and there are really not enough long-term appropriate studies to really designate that area a utility corridor.

As far as the visual aspects of it, I think the draft environmental impact report really didn't address the type of people that we have in Modoc County, and that was alluded to by several individuals already. The reasons why we live here were not really appropriately looked at, and these reasons are most of us live here because of the expanse of large views that we are trying to appreciate and because we love the beauty and the nature of the area, and the biological habitation that we have is extensive. TA. 6-4

Now why do people live in Sparks, Nevada, or the Bay Area?

They live there for money and jobs, maybe closeness to cultural resources on the weekends.

What do we do on the weekends?

We will go camping and fishing.

In the city, in Sparks, Nevada, or Reno or the Bay Area, they maybe go to the mall. They may be go to the theater, so there is a definite difference. And I don't think that we really addressed how important this

is. That's the visual aspects of this power line.

And also what wasn't really appropriately addressed was the mitigation related to that. This is a sociological issue. Social economics was covered in the draft EIR as far as fire protection, police protection, these types of things. But we cite a lot of mitigation related to other forms of wildlife, the hawks, offset compensation down the road, but as far as the severe sociological, psychological impacts caused on the specific people of Modoc County who have lived here and who built here under specific laws for specific reasons I don't think is appropriately addressed.

TA. 6-4

And some of those visual aspects, for instance with Dagger Canyon, are incredibly severe. Dagger Canyon is in the yellow portion in the top end point, the line which takes a twisted route way and skylines the whole area.

TA. 6-5

Now the point that it drops off is the --

ALJ CAREAGA: Excuse me, Mr. Krauel. Why don't we take a break until ten minutes after the hour, and then we will continue with the other speakers and give you a chance to wrap up your remarks then. I'm sorry to interrupt you, but we will be off record until ten minutes after the hour.

(Recess taken)

ALJ CAREAGA: On record.

Would you please continue.

MR. KRAUEL: To finish up my presentation, and

basically we were getting into the routing portion. And we talked some about Infernal Caverns, crossing the Pit River, the north end where it crosses or goes around Dagger Canyon.

Dagger Canyon is highlighted in yellow here, and it's a fairly zig-zagged type of pattern that is basically the skyline. The majority of the canyon drops off a very predominant rim which is noted in the upper left photograph there. That point is visible from all over the valley, the Warm Springs Valley -- from Likely, visible from all over the City of Alturas.

And basically what this tells me is that further routing studies need to be done to appropriately designate this as a new utility corridor. Thank you.

ALJ CAREAGA: Thank you. Our next speaker is Lee Anderson.

Mr. Anderson.

STATEMENT OF MR. ANDERSON

MR. ANDERSON: That's a hard name to mess up. You did well.

My name is Lee Anderson. I live in Mount Shasta, California. The reason that I'm here tonight is to address the transmission line and the impact that it's going to have on the environment.

The two visual management systems that are referred to in the draft joint environmental document are prepared by the Forest Service and the Bureau of Land Management. The Forest Service visual management

system was prepared in 1974. The BLM visual management system was prepared in 1976 based on the Forest Service System.

In 1991 my firm, Environmental Consulting, Planning and Design in Mount Shasta, won the contract as the most qualified firm in the United States to rewrite the Forest Service visual management system. And this is my copy of the draft rewrite of that visual management system.

I agree with all of the presenters up to this point tonight regarding the negative visual impact of the proposed transmission line. I especially agree with the comments made by Dr. Krauel tonight regarding land use values, property values, property rights and the visual impact of new transmission lines.

All of you folks in this room are property owners, I'm assuming, here in Modoc County. I am not. However, when you buy property, and there are maps like this and there are zoning maps for the county and there are land management plans prepared by the BLM and the Forest Service, you buy your property with certain assumptions of what your property values are going to be in the future based on those zoning and planning documents.

If I were a property owner here, I would be very concerned about the negative economic impact as well as the negative social impact that you are going to receive.

The speakers that have presented already tonight are very correct in that open space views, views to long distance vistas are extremely important.

One of the things that we found in researching, doing over 5,000 pages of literature review for the new handbook for the Forest Service, was that there's a basic physiological, psychological response that people have to natural landscapes. And these have been charted by medical professionals. In fact this information first occurred when a building architect and his best friend, a heart surgeon, when the heart surgeon mentioned to his architect friend that patients seemed to recover more quickly if a hospital room they are recovering in has a window to a natural landscape view, be that an atrium or be it to a skyline out to something like the Warner Mountains to the east or Mount Shasta to the west. There are physiological responses, lowering of blood pressure, neuromuscular path, which was a calming effect of the natural landscapes. TA. 7-1

Part of the new system that we've developed for the Forest Service is a spectrum of landscape characteristics. This book has not yet been printed. It will be printed this fiscal year. And in the spectrum of landscape characteristics, which I have commented on landscape characteristics in my initial letter to Julie and Peter, we have identified a spectrum that goes from naturally evolving landscapes, such as we find in the wilderness, clearly through

natural-appearing pastoral, rural, agriculture and urban landscapes. There is something beyond this that I would use if I were writing an EIS/EIR in an urban setting. That is a spectrum out here clear off the page of industrial landscapes.

My concern for all of you folks is that the power line basically takes natural-appearing landscapes and shoves them clear off the edge of the spectrum in an industrial landscape setting.

And I have given you some words with which hopefully you can describe what you are feeling, because all of you in the room that I have heard so far are feeling very upset that this is going to change your quality of life and it's going to change your property values, and I do agree. And our research for this new book substantiates everything that you have said tonight.

TA. 7-1

I had a meeting with the Forest Service and BLM last Friday afternoon after I had attended the County Planning Commission. It's already been mentioned that the County Planning Commission voted five to zero to oppose Segments A and B here at the beginning, and they recognize the need for power. They are not opposed to the project, but they do unanimously oppose Segments A and B for what it's doing to the social and natural environment here at Alturas.

It's interesting for me to note the Western Regional Corridor Study was proposed at the same time.

TA. 7-2

It's copyrighted in 1992 by Sierra Pacific Power Company, and this map is exactly the same time that we were told at the Planning Commission that the route was selected for the new corridor.

It seems to me that if this new corridor was selected two and a half years ago, as company representatives indicated to us on Friday morning, that the line should show. There ought to be another black line here leading down to Reno. That line is obviously missing, and I can't understand why.

This map was prepared for the Western Utility Group by Michael Clayton and Associates as a member of the Aspen Group. So I can't understand why this wasn't brought forward more evidently in the draft joint environmental document. And like I have said before, the timing is just more than coincidence, that it's exactly the same copyright date as when this route was reported to us to be selected.

TA. 7-2

I do believe there are alternate corridors that are available. I do believe that once a transmission line is built, it will be a magnet. Other facilities will be built next to the transmission line. I believe you'll see not only fiber optic cable, which the companies talk about, you'll also see pipelines and overhead and underground structures.

And I think the visual simulations that have been done may be misleading. Perhaps you should be showing in the visual simulations two or three overhead

TA. 7-3

structures parallel one to another, because that's certainly what we have in Siskiyou County by the little town of Bartel. There are two lines exactly together. TA. 7-3

I find no rationale in the draft joint environmental document for the 2,000 foot separation. And we have heard rumor that that came from a fire study rate of spread for fire from a firm in Chicago. And certainly the folks here from the Forest Service, BLM, California Department of Forestry and Fire Protection are much more expert in the rate of spread of fire than is a firm in Chicago. TA. 7-4

Finally, I find the discussion in the joint environmental document to be inadequate regarding the abandonment of the project. And simply removing towers or removing the conductors leaving the towers if the line were to be abandoned has not been discussed. TA. 7-5

Also, if it were abandoned, would the landscape be restored to its pre-existing condition of a natural appearing landscape? Would contours be replaced?

The site recoverability of most of the landscape in Modoc County is very low. It would take centuries to recover to the condition that it is in right now. And I don't believe this has been adequately covered in the environmental document. TA. 7-6

I think my time is probably up, and I thank you very much for your attention.

ALJ CAREAGA: Thank you, Mr. Anderson.

The next speaker who has asked to be recognized is initial R. Mark Armstrong.

We will go off record for the reporter to change paper.

(Off the record)

ALJ CAREAGA: We will be on record.

STATEMENT OF MR. ARMSTRONG

MR. ARMSTRONG: Good afternoon, your Honor. My name is Mark Armstrong. I'm a principal of Earth Energies. I am a property owner in Alturas, and I find the Aspen Environmental report almost repugnant.

The views that were neglected of Mount Shasta are tremendous and protected by state law.

Mount Shasta is a terrain feature. It is also a scenic terrain feature, as stated in the county general plan. TA. 8-1

This is a picture from Alturas. It was scanned into a computer, and this is what we believe the first simulation will look like. And this is what we believe the second line will look like.

I'd also ask for an extension of the comment period to 90 days as allowed by Article 8, Section 15 H 35, subsection C of CEQA.

I would like to now address the omissions, inconsistencies and questionable analysis of the EIR/EIS.

The cumulative effects of this power line were not addressed: The growth stimulation in Reno and the TA. 8-2

46

water consumption that will cause that Reno does not have. Additional requirements on the hydroelectric power system of the cheap northeastern power that Sierra Pacific wishes to tap into, and the environmental effects on the salmon, on other endangered species, and the sedimentation on these hydroelectric power sources and what effect this will have on the long-term reliability of this system. Additional building of power lines from this to the north to tap into the cheap hydroelectric power of the northeast. TA. 8-2 TA. 8-3

Not including Mount Shasta in their analysis, I believe, should be considered a fatal flaw of this analysis. Mount Shasta is recognized as a terrain feature. Therefore the view is protected by our general plan. There are over 70 picture windows in the City of Alturas that take in that view. I believe that all of those home owners' property values will be damaged. They are being harmed and should be made whole. TA. 8-4

I have given you Exhibits A, B and C of a photo simulation of a view of Mount Shasta as seen to date, and we believe that is what will occur if this power line is allowed to be put across the Pit River Valley.

There are numerous problems with this power line going across the Pit River Valley, including the sand hill crane, the eagles, the Swainson hawks that will be taken. A taking permit from Fish and Game will be required for that activity. And it seems to me that TA. 8-5

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

47

the bald eagle should not be taken for the use of a power line. If this power line must go across the Pit River Valley, it should be buried. TA. 8-5

If that causes economic hardship on Sierra's power line, they should then look to the Nevada corridor where a 2,000 foot separation seems to be in their best interest, rather than shoving this power line down the throats of the good people of Modoc County.

The Pit River Indians consider Mount Shasta to be a magic mountain, and they were never consulted regarding their views or accessibility of Mount Shasta. TA. 8-6

There's a significant body of evidence that livestock and production rates are reduced around power lines. Human environmental effects were examined, but not the effects on livestock and other breeding creatures that will inhabit the area around the line. TA. 8-7

This will damage people on the brink of bankruptcy now and could push them over the edge. I don't think that that would be fair to a rancher, to reduce his production rate because people in Reno need additional power.

The City of Alturas is a fairly isolated community. However, we do enjoy listening to radio stations from the Bay Area, such as KGO. At night we get a skipped transmission. I believe there will be a shadowing of that transmission further isolating the City of Alturas. TA. 8-8

The geologic impacts. I believe I have the

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

authority to speak here. I'm a registered geologist in the State of California.

The transmission line transects a feature zone where we have active faults that will move during the life of the transmission line. An active fault that interrupts power and damages structures in the Reno area is not consistent with the overall recommendations of this power line. The need for reliable power in Reno is what we need. There are other routes, such as the Nevada route, that do not transect active faults. Those faults will move. That's why they are considered active by the USGS. And when they move, they will -- their intensity will be in the 6 to 7 range on the Richter Scale and most likely damage structures in the Reno area and damage this power line. When that happens, we don't have reliable power, which is one of the main considerations for this power line. TA. 8-9

There are proposed mitigations which violate case law. Case law indicates that future studies cannot be used as mitigation measures. However, they are going to do further studies on the seismic activity in the area, on the structures as they are placed, whether landslides will affect them or not.

I don't believe that is allowed. Those are called future studies and cannot be done anymore.

That was a concern raised in a Mendocino County case, and future studies are no longer allowed, and mitigation measures G-3 and G-4 seem to be in

violation of that.

Mitigation measure G-2 is not a feasible mitigation if the power line is considered a structure. Mitigation measure G-2 says that the structure shall not cross any active faults. If the power line is considered a structure, then G-2 is not feasible on this placement. And other alternative placements are -- would avoid active faults. TA. 8-9

Hydrologic impact. Mitigation H-1 to prepare a stream bed crossing plan for perennials is also in violation of case law because they haven't developed the plan. They just say a plan will be developed. They just say what the outcome of the plan is to be. They just say we are going to develop a plan in the future. What it's going to be is like hitting a moving target.

I can't analyze their mitigation measure when they haven't developed the plan. I have to see the plan to analyze their mitigation measure. TA. 8-10

Their mitigation measure is to prepare a stream bed crossing plan. How do I know what effect that is going to have in the stream bed, the water quality or other aspects of that project until I see the plan?

And that is a fatal flaw.

H-7 is to develop procedures for constructing in wetlands. If I don't know what those procedures are to be and what plans they have, how can I analyze or comment on their plan?

It is in violation of CEQA and of case law and is another fatal flaw. TA. 8-10

And I haven't even read the entire document yet, and I have already found at least four fatal flaws in this document.

ALJ CAREAGA: Mr. Armstrong, I wonder if I could interrupt you at this point and allow the remaining speakers to make their comments and then come back to you and the other speakers who have already begun to finish, if you wouldn't mind.

MR. ARMSTRONG: No problem. I'm almost done but.--

ALJ CAREAGA: If you can finish up then in short order, why don't you go ahead.

MR. ARMSTRONG: Let me come back, because I have biological aspects to go over yet and some other things.

ALJ CAREAGA: Okay.

MR. ARMSTRONG: Thank you for your time.

ALJ CAREAGA: The next speaker that has asked to be recognized is Sally Clark.

Is Ms. Clark here?

Would you please come up to be closer to the court reporter.

STATEMENT OF MS. CLARK

MS. CLARK: Thank you, your Honor. I'm pleased to have the opportunity to speak. My name is Sally Clark. I am a citizen of Modoc County and a land owner.

The property does not go through our ranch, but it goes near it. And I am in agreement with the

other people here tonight. I do not want the power line.

You come from a large city. Where, San Francisco?

And I'm sure when you come up here, if you haven't been in areas like this before, it seems like there's nothing here, but there are many things here. There are people here. And just because we are not a large body of people doesn't mean that companies and the government have a right to walk all over us.

If we were in Redding the amount of people that showed up here tonight, proportionally we would have 1500 people here. If we lived in a city with a million people, the amount of people that showed up here tonight to talk to you would be 13,000, 15,000. That shows that we care.

We also have dedicated citizens who have been talking to you and who have put in countless hours of research and study on their own time and at times even paying out their own money for legal counsel to try to go through this as a democratic process to keep another company from doing something we don't want. This is what America stands for. We are hard working people. We pay our taxes and we live here, and we have moved here to get away from power lines, to get away from other companies coming in and telling us what to do.

We like to see the mountains, and we like to see the mountains without one power line, two power

lines, three power lines or whatever going between us and it.

Now other speakers have come up tonight and given you biological rationale, talked about species deficit, talked about habitat loss and other environmental factors that will affect the area. And they have given you biological reasons.

We have an impact statement. The environmental impact statement has been done by California Fish and Game. The power company paid California Fish and Game to do the impact statement to, what was it, the tune of $1,400,000 or something.

Who is the benefactor of that impact statement that is writing it for the power company?

On top of that, who is going to be the benefactor if the power line goes through?

Cal Fish and Game, where some of the land from the power company is going to be deeded over to Cal Fish and Game.

That means to me that the impact statement is bogus. It's being done by an organization that is going to benefit from this power line.

We, the citizens of Modoc County, are not going to benefit from the power line. The power is not for us. The power is only going through here to save a company who is not doing anything for us, for money. That does not make sense. And yet they think they can do it because Modoc County is small and the people are

TA. 9.1

insignificant.

We have already had a breach of our rights already, as you know, with Melvin Carter coming up here because the county is small and they think the people here are insignificant.

We are not insignificant. As you can see, we are very educated people. We are hard-working people, and we have rights, and we are getting kind of tired of outsiders coming into Modoc County and telling us what we have to do. Because we are small in numbers, we have no rights.

This is a beautiful area. You can see that for yourself. Why should we for the rest of our lives and our children's lives and our grandchildren's lives look at something for a company that's not even bringing anything into Modoc?

It is just to save someone some money now so that they can have a bigger profit margin, and we are going to look at it for the next century and more perhaps. That doesn't make sense.

So I'm giving you a gut level feeling of how we feel as the citizens of this county, and you have heard from very educated individuals who have done tremendous amounts of research about this area. We are not an insignificant number. The small numbers you see here represent our community, and, you know, people are busy and they can't come out. You know, they have got children. They have got ball games and whatever else.

But like I said, if we were a community of a million people and you had 15,000 people standing here tonight speaking to you, would you listen?

We are a small community, but we have proportionally that many people speaking to you tonight. Thank you.

ALJ CAREAGA: Thank you, Ms. Clark.

I am now going to ask if there is anybody who wishes to speak who has not spoken and has filled out a card if you'd like to speak, now is an opportunity.

Again, if you'd like to comment in writing, the record is going to be held open for the receipt of written comments postmarked by May 3rd.

Would any of the previous speakers like to continue their remarks from earlier?

MS. CANTRALL: I would like to add one thing, your Honor, if I --

ALJ CAREAGA: Would you please come up again.

MS. CANTRALL: Do I need to state my name?

ALJ CAREAGA: Please state your name.

STATEMENT OF MS. CANTRALL

MS. CANTRALL: Patricia Cantrall, C-a-n-t-r-a-l-l. Likely.

What Mrs. Clark just said is more or less what I said, but it brings to mind something else. You, sir, are from San Francisco, and I think I told you I was born there. I had an aunt who lived in St. Francis Woods overlooking the Bay. As a little girl, I lived in

Corte Madera, which was no larger than the City of Likely in which I now live.

If a power line were to be built across the skyline of San Francisco, which I believe has a rule that your houses can't be built up, you know, and above anybody else so that everybody has a successive continued view of the bay or the surrounding area, I would hope that the Commission would take this into consideration. Think of your people in the Bay Area with that beautiful view or what was once a beautiful view of Drake's Bay and think of us with our beautiful maybe-to-be-ruined view of the valley.

I was talking to one of these gentlemen and realized they are trying to do their job, but when I was a little girl in Corte Madera, we could see the lights of Oakland, Berkeley, San Francisco coming on and even the magnificent prison, no longer there. And we would pinpoint those lights. Aha, that's this, that's that.

At night from my home I can see almost into Alturas. And it is not believed perhaps by people from the city, but this is a county of 8,000 people. I can honestly say I know 5,000 of those people on a first-name basis.

I am in here tonight representing the Town of Likely of 200 people and my neighbors from the other end, Dr. Krauel and what not. I don't want to see their view ruined. Even though the power line is now going to be far enough over to the right that it probably isn't

going to really bother my view, it will bother the view for many ranchers. So maybe I didn't need to come in here, but if we let one come in, as I said to you earlier, your Honor, we're going to have god knows how many.

But anyway, when you go back to your people down below, please ask them to consider this: Would they like the same thing being done in the cities that is being done to us up here? Would they like some view taken away?

Because we don't want our lifestyle ruined.

And that business of Carter was mentioned. Yes, we are way out away from everybody. But as I said, we choose to live here. We choose to live in a little populated area, and we can borderhop to Reno or to Klamath Falls if we want to go to the mall, but we like the peace and quiet and the view of the 20 miles worth of the South Fork Valley. Thank you.

ALJ CAREAGA: Thank you.

Are there any other speakers who wish to add to their earlier remarks?

(No response)

ALJ CAREAGA: Hearing none, we will be off record and we will take -- excuse me.

Mr. Armstrong.

STATEMENT OF MR. ARMSTRONG

MR. ARMSTRONG: Well, I'll try to make it quick. My name is Mark Armstrong.

The power line has admitted that they'll take endangered species such as the sandhill crane and the bald eagle. And if the power line was buried across the Pit River Valley, this taking would be significantly reduced. But it would also increase the view enhancement. TA. 8-11

The Infernal Caverns have already been mentioned and increasing the impact there. It's an area that is of great historic significance. There are soldiers buried there and --

A VOICE: No soldiers.

ALJ CAREAGA: Please, one speaking at a time.

MR. ARMSTRONG: It's great significant value out there in terms of historic significance, battles between the Indians and the American soldiers starting out there, and we would like to protect that for future generations to come. And we believe that opening it up to a power line is not an appropriate use of our historic past. TA. 8-12

And we wish that the power line, as you know, that most of us in the room are opposed to the power line and believe that it should be sited in a different location, in a corridor that was proposed at the same time as these maps were put out. And we believe that the corridor would help the density of the lines and keep them controlled and not helter skelter all over the countryside. And we believe that those corridors are already available to Sierra Pacific. TA. 8-13

58

ALJ CAREAGA: Thank you, Mr. Armstrong.

MR. ARMSTRONG: Thank you.

ALJ CAREAGA: Your name continues to elude me.

Mr. Krauel.

STATEMENT OF MR. KRAUEL

MR. KRAUEL: If I could just add one more thing, your Honor, I would like to just briefly.

On the language of the draft environmental impact report, in several places when the no project alternative was discussed, there seemed to be similar language that kept coming up. And as an example, I'll just use the language that was used in relation to the visual impact, and it reads under No Project Alternative:

"Under the No Project Alternative, the visual impacts described above would not occur. However, similar visual impacts would occur in other geographic locations as the Applicant pursues short- and long-term system upgrades needed to accommodate the projected system loads that the Proposed Project is designed to address."

TA. 6.6

The one sentence I think should be potentially modified is "However, similar visual impacts would occur in other geographic locations...."

I think first of all that this is assuming a

59

need, and the need has not been demonstrated yet. And that has yet to be determined.

Secondly, there really is not significant justification that similar visual impacts would indeed be incurred in other geographic locations. For instance, if Nevada generation were an appropriate alternative for Sierra Pacific, certainly the visual aspects would be quite different. And I think that's appropriate and legitimate. If the thousand DC line in Nevada were tapped into that were 30 miles east of the City of Reno, again the visual aspects would be totally different.

TA. 6.6

So I think that the wording in this which recurs throughout the draft environmental impact report, that language is a little bit misleading and almost somewhat biased.

Also, on page A6 in the draft environmental impact report, under agency use of this document it states, the EIR does not make recommendations regarding approval or denial of the project. It is merely informational in content. And I think that's appropriate. And I think really what should be occurring here is the decision makers read this document and evolve their own independent decisions.

TA. 6.7

But on page D13 it states, based on the analysis presented in Section C14, none of the transmission alternatives were found to offer advantages over the proposed project. Considered analysis in

Section C14 reveals the issue area by issue area analysis of the no project alternative in Section C2 through C13 of the proposed project is considered to be environmentally superior to those alternatives included the no project alternative.

I think that statement is basically drawing a conclusion. And even though the word "recommendation" is not being used, certainly there is an implied recommendation here that should be left up to the decision makers. And it contradicts a little bit what has been said before.

And I think, in summary, the language and actually the purpose of the draft environmental impact report may be reviewed and cleaned up a little bit.

TA. 6-7

ALJ CAREAGA: Thank you.

Were there other speakers who had spoken previously that wished to add to their remarks, or is there anyone who has signed up to speak but not yet had a chance?

MR. DEES: I haven't signed up. I have the --

ALJ CAREAGA: Off record for a moment.

(Off the record)

ALJ CAREAGA: We will be on record.

Mr. Joe Dees, D-e-e-s, has asked to be recognized.

Would you please state your name, sir.

STATEMENT OF MR. DEES

MR. DEES: Yes. My name is Joe Dees, and I live at

North Warner Street where the B route would come right through by my house, the golf course and through properties that would affect 50 homes, one church, Holiday Market. And we definitely don't want it there. We don't believe it should be there, and we also believe that it shouldn't be on Route A.

All the reasons that Dr. Tom Krauel stated I'll back up. I missed part of this. I didn't hear what everyone had to say, but move it out of town. There is a corridor out there. I'm going out there on the 29th, and it goes right by some mining property we have in Nevada. There's nothing out there and lot of room to build, and it shouldn't affect anyone. We'd like to see it go in that direction.

ALJ CAREAGA: Thank you.

Peter, would you like to be recognized?

MR. HUMM: Yes, your Honor.

My name is Peter Humm. I'm the project manager for this project for the Bureau of Land Management.

I would just like to correct, if I could, one thing that Mr. Stahl said. He made a statement in his remarks that the BLM supported the Nevada alternative.

The BLM has not taken a position supporting or opposing any particular alternative or even supporting or opposing the project. It's premature at this point for BLM to even take a position as far as approval or denial of the application.

We're still in the process of considering the application and the draft environmental impact statement as part of that process. So Mr. Stahl's remark as far as BLM supporting a particular segment or a particular alternative does not reflect the position of the Bureau of Land Management. Thank you.

MR. STAHL: I apologize, Mr. Humm.

ALJ CAREAGA: Thank you.

We will be off record.

(Off the record)

ALJ CAREAGA: We will be on record.

We have been off record for approximately 45 minutes in an informal question and answer period. And as it's getting late in the evening, I asked if anybody as a result of the question and answer period wished to supplement their previous remarks on the record or add to the record. And I'll now give the opportunity to do so.

I'm going to limit it to about five minutes so that we can take a few minutes longer informally and continue the informal discussion, but I want to let the formal portion of this proceeding come to a close.

Yes, Mr. Armstrong.

STATEMENT OF MR. ARMSTRONG

MR. ARMSTRONG: My name is Mark Armstrong, and I have a question for Gary with Aspen Environmental.

After seeing our photo simulation of Mount Shasta as viewed from the city of Alturas, do you

TA. 8-14

or do you not believe that is a Class 1 non-mitigable impact to the view?

TA. 8-14

ALJ CAREAGA: I'm going to rule that question out of order for purposes of taking comments on the environmental impact statement. The issue has been posed, and it will be addressed in the appropriate fashion in the final environmental impact statement.

If you wish to become a party to the evidentiary proceeding to introduce sworn testimony subject to cross-examination, I'll extend to you the same privilege of cross-examining other witnesses in the evidentiary proceeding.

But again, we are not subject to the rules of evidence, and it's unfair to ask a witness who is not prepared for that purpose to render a professional opinion.

MR. ARMSTRONG: He will be now.

ALJ CAREAGA: Thank you.

Mr. Krauel.

STATEMENT OF MR. KRAUEL

MR. KRAUEL: If can I just put this on the record. My name is Tom Krauel, and in lieu of the recent developments with fiber optics, I would ask that Aspen Environmental also address the cumulative impacts of that in association with the project, because through maybe lines that would come in from, say, for instance, the substation or various tap-in points to the city or whatever, and I don't think that was addressed in the

TA. 6-8

draft EIR.

ALJ CAREAGA: Thank you.

This will conclude the record for this public hearing tonight. We will continue to take questions and answers informally so long as strength holds out.

Do you wish to speak?

MR. DUNN: Yes. Do you want me to state my name?

ALJ CAREAGA: Yes.

MR. DUNN: My name is Mike Dunn.

ALJ CAREAGA: And how do you spell that, please.

MR. DUNN: D-u-n-n.

ALJ CAREAGA: Thank you.

STATEMENT OF MR. DUNN

MR. DUNN: One of the issues I believe that is not addressed by this draft environmental report is there has not been any study done to the potential economic impact to the tourist-related industry in this county. I believe the tourist industry has a very large potential for financial gain in this county. This is the last pristine part of California. Its western heritage here has a lot of potential as a dude ranch type of environment, and I don't -- there was nothing addressed in this aspect at all by that report, and I think that should be looked into.

TA. 10-1

ALJ CAREAGA: Thank you, Mr. Dunn.

We will be off record and adjourned from the formal proceeding. Everyone is welcome to stay and ask questions, and I thank the reporter very much.

(Whereupon, at the hour of 8:50 p.m., this matter having been continued to 6:00 p.m., April 18, 1995 at Susanville, California, the Commission then adjourned.)

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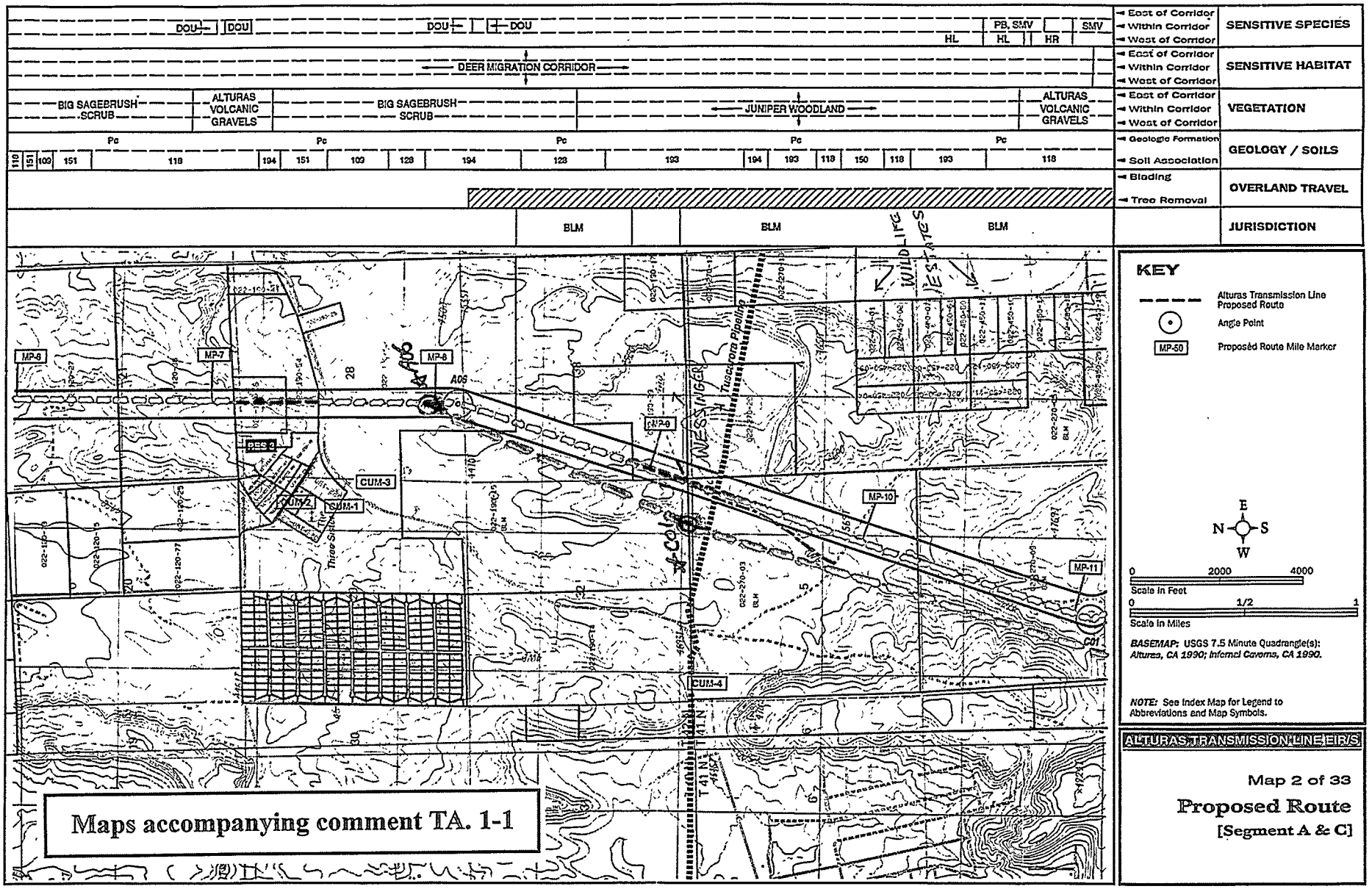
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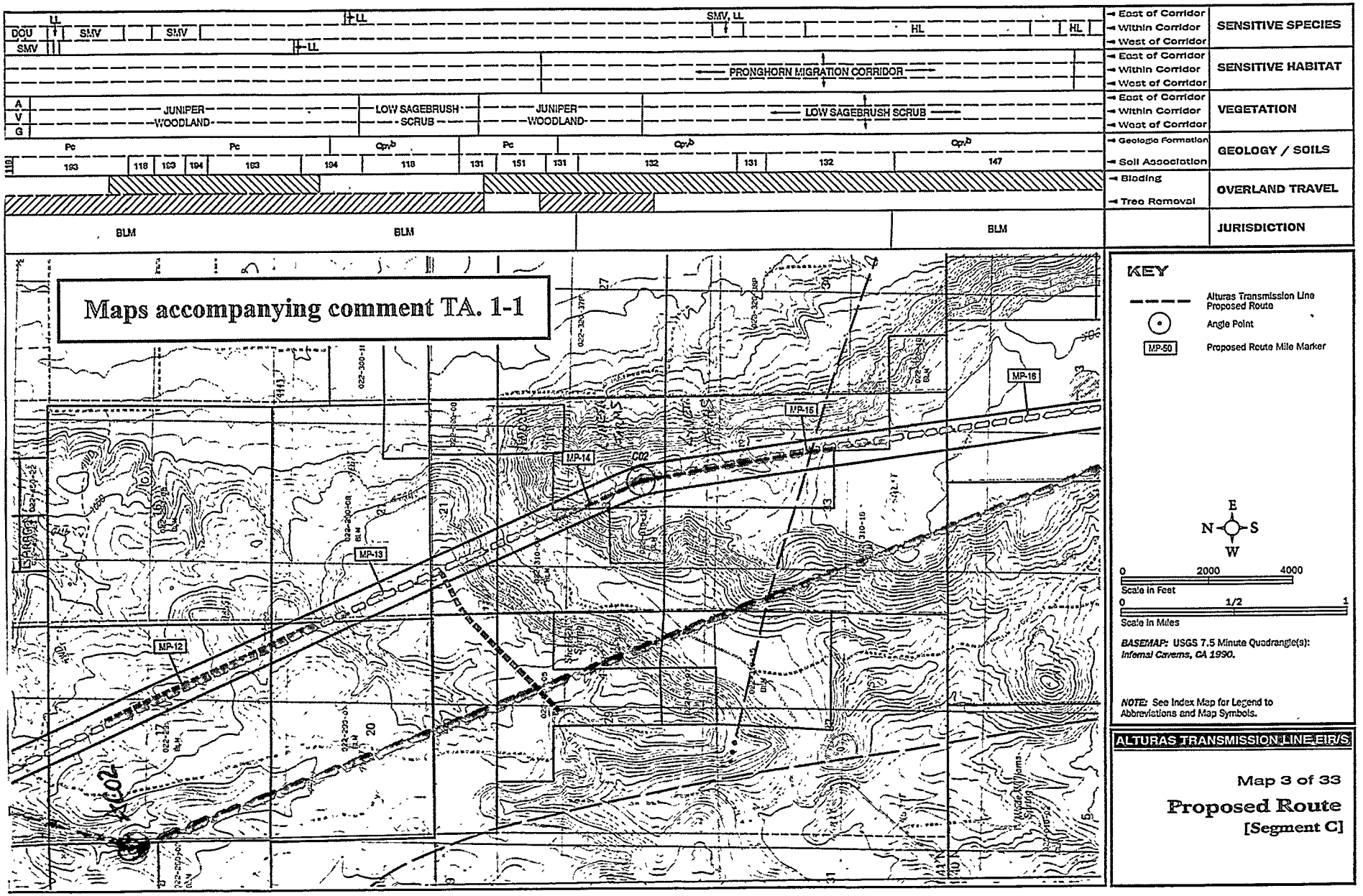
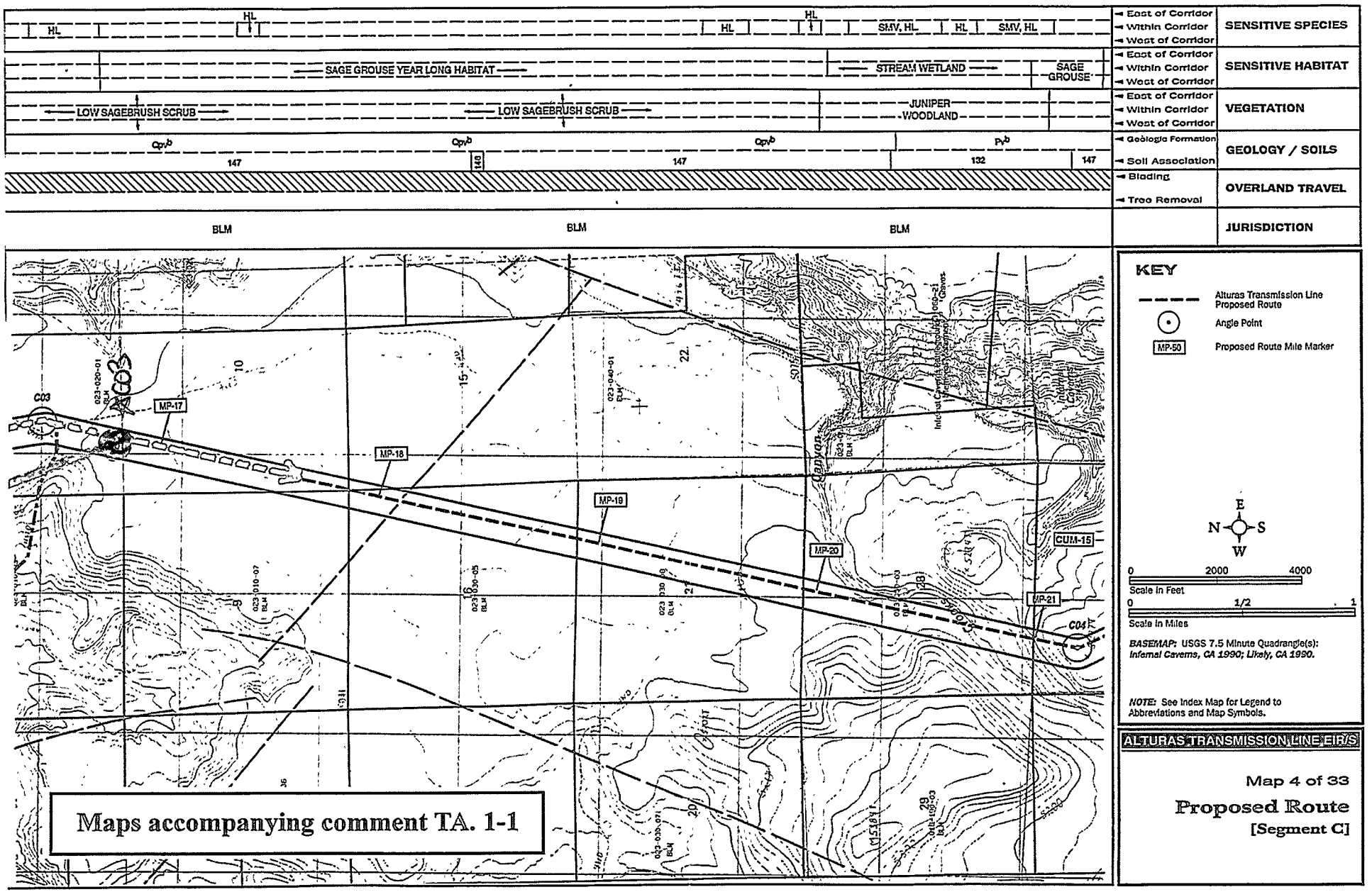
MP-10
MP-11
CUM-1
CUM-2
CUM-3
CUM-4
PES-3
A05
A06
C01
T41N
Maps accompanying comment TA. 1-1
East of Corridor
Within Corridor
West of Corridor
SENSITIVE SPECIES
East of Corridor
Within Corridor
West of Corridor
SENSITIVE HABITAT
East of Corridor
Within Corridor
West of Corridor
VEGETATION
Geologic Formation
Soil Association
GEOLOGY / SOILS
Blading
Tree Removal
OVERLAND TRAVEL
JURISDICTION
KEY
Alturas Transmission Line Proposed Route
Angle Point
MP-50
Proposed Route Mile Marker
E
N
S
W
0
2000
4000
Scale in Feet
0
1/2
1
Scale in Miles
BASEMAP: USGS 7.5 Minute Quadrangle(s): Alturas, CA 1990; Informal Caverns, CA 1990.
NOTE: See Index Map for Legend to Abbreviations and Map Symbols.
ALTURAS TRANSMISSION LINE EIR/S
Map 2 of 33
Proposed Route
[Segment A & C]


East of Corridor
Within Corridor
West of Corridor
SENSITIVE SPECIES
SENSITIVE HABITAT
PRONGHORN MIGRATION CORRIDOR
VEGETATION
JUNIPER WOODLAND
LOW SAGEBRUSH SCRUB
Geologic Formation
Soil Association
GEOLOGY / SOILS
Blading
Tree Removal
OVERLAND TRAVEL
JURISDICTION
BLM
Maps accompanying comment TA. 1-1
MP-12
MP-13
MP-14
MP-15
MP-16
C02
KEY
Alturas Transmission Line Proposed Route
Angle Point
MP-50
Proposed Route Mile Marker
Scale in Feet
Scale in Miles
BASEMAP: USGS 7.5 Minute Quadrangle(s): Informal Cavems, CA 1990.
NOTE: See Index Map for Legend to Abbreviations and Map Symbols.
ALTURAS TRANSMISSION LINE EIR/S
Map 3 of 33
Proposed Route
[Segment C]



Maps accompanying comment TA. 1-1

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CACD - Ms. Halligan

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGE RICHARD CAREAGA, presiding.

Transcripts - Susanville

In the matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.	Application 93-11-018

REPORTER'S TRANSCRIPT

Susanville, California
April 18, 1995
Pages 66 - 368
Volume 2

Reported by: Maureen Buckley Inchauspe

H.C. Kaufman, Jr., Official Reporter
PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

INDEX

STATEMENT OF:	PAGE
MR. HILL	74, 106
MS. BOWEN	76, 94, 103
MR. CHORAK	85
MR. BATTLES	87
MR. HERMAN	89, 101
MR. ELLIOTT	97, 102
MS. HOUSTON	99
MS. EIDE	105
MR. BAXTER	107

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

SUSANVILLE, CALIFORNIA, APRIL 18, 1995 - 6:00 P.M.

* * * * *

ADMINISTRATIVE LAW JUDGE CAREAGA: We will be on record.

Good evening, ladies and gentlemen. My name is Richard Careaga. I'm an administrative law judge for the California Public Utilities Commission.

This is the time and place noticed for a public hearing to receive oral comments on a draft environmental impact report and statement concerning the proposal of Sierra Pacific Power Company to construct a high-voltage power line, overhead power line from Alturas, California, to Reno, Nevada.

The application number assigned by the Commission to this proposal is A. 93-11-018. Commissioner Jessie Knight is the assigned commissioner for the Commission.

The United States Bureau of Land Management has assigned case number CACA-31406 to the proposal.

The Bureau of Land Management, represented by Mr. Peter Humm on my right, is working with the California Public Utilities Commission, who is represented by our project manager, Julie Halligan, on my left, to prepare a joint environmental impact report and statement that is to assess the environmental impacts of the proposed Alturas 345 kv transmission line.

This public participation hearing provides for

public comments on the draft EIRS that's been prepared by the Commission and by BLM.

The BLM, in accordance with the National Environmental Policy Act, will consider and respond to all oral and written comments as part of the preparation of a final EIS/EIR for the proposed transmission line.

The BLM and other federal agencies will use the final EIRS as a basis for their decision to approve or deny the application by Sierra Pacific Power Company for a transmission line right-of-way across federal lands, and the federal agency decision will be coordinated with our decision on the application that's before the Commission.

This hearing is being recorded stenographically by a court reporter. The transcript from this hearing will form part of the official record for the Commissioners to consider when certifying the environmental impact report and statement that will be prepared, and it's very important that the transcript accurately record what you say here tonight. For this reason I'll be asking your help.

First, please speak slowly, and I'll try to give you hand signals when I think you are speeding, so that Maureen can keep up with you. If necessary, I'll interrupt you. And I may also ask you to spell names for the reporter, especially local place names with which she may not be familiar.

Second, of course, I ask you to speak one at a

time. If you need to talk to somebody about something, if you could step outside to do so, so that we don't interrupt the flow for the reporter.

And third, I'd like to ask people to limit their initial remarks to about five minutes. As I indicated, I'll give everyone a chance to speak again after a first round, and you'll also have the chance to make written comments as I'll explain in a moment.

We will try to take breaks about on the hour to give the reporter a chance to rest, and we may have to take breaks in between to change the paper.

Again, if you're hesitant about public speaking -- I'm sure there is nobody here who is that shy -- and you want to make your views known, you can do so in writing. To do so, you should respond by mail before May 3rd, 1995, is when the postmark should be.

Julie Halligan can give you the address for that.

Now please be aware that this hearing has got a different purpose from the public hearing we will be conducting later. Tonight we're more concerned with gathering information about the environmental impacts of this project, good, bad or indifferent. The most helpful contribution that any of you can make tonight is to point out facts and issues that the environmental impact report and statement may have overlooked or may inadequately address.

If you have questions concerning the report

and its data, analysis and conclusions, a representative of Aspen Environmental Group, Dr. Gary Meunier, is here tonight, and he'll be prepared to answer your questions after everybody has made the comments that they wish to make.

And again, if as a result of that question and answer process people want to go back on the record and make additional comments to be recorded, I'll be more than happy to accommodate that.

There will be another hearing on the proposed project next month. On May 22, 1995, beginning at 9:00 a.m., I'll conduct evidentiary hearings here in Susanville at the City Council Chambers at 62 North Lassen Street. The hearing will continue until May 26th unless sooner complete.

The purpose of the hearings next month is to take testimony on the project by the project proponent, Sierra Pacific, and others concerning whether the project as proposed is in the public interest. At the beginning of those hearings, any person who wishes to will be permitted to make a concise statement without the necessity of filing advance prepared testimony. These statements will not be under oath, and they will not be subject to cross-examination.

Now while the Commission will consider the statements, the Commission will not base its findings of fact and conclusions of law upon them.

If any member of the public wishes to

1 participate more fully in those hearings as an
2 interested party with the right to introduce evidence
3 and conduct cross-examination and to file briefs on the
4 project, you may do so by filing a written motion with
5 the Commission stating the issue that you wish to
6 address and describing the extent of your planned
7 participation, or you may attend the hearing and enter a
8 formal appearance.
9 You may, but you are not required to, be
10 represented by a lawyer at those hearings. If you
11 appear as an interested party, you may introduce sworn
12 testimony in writing on or prior to May 4th, 1995. You
13 may cross-examine witnesses introduced by other
14 parties. You may present sworn rebuttal testimony to
15 the testimony of other parties, and you may make written
16 argument in formal written briefs concerning the
17 evidence and the applicable law.
18 Your participation in that formal, courtlike
19 proceeding will be governed by the Commission's Rules of
20 Practice and Procedure.
21 Following the completion of a final
22 environmental impact report statement, the Commission
23 will determine if that report meets the requirements as
24 to form and substance of the California Environmental
25 Quality Act.
26 The Commission will not decide upon Sierra
27 Pacific's application until it has certified the final
28 environmental impact report. As a result of the

1 contents of that final report, the Commission may be
2 required to reach specific findings concerning
3 significant environmental impacts of the project before
4 it is able to approve it.
5 The most obvious question about this project
6 as we sit here tonight is why a project that is
7 primarily needed to serve electric energy needs in
8 Nevada is being routed through California. That's a
9 fair question, and it needs to be fairly addressed in
10 the environmental impact report and in the evidentiary
11 hearings next month.
12 The report does consider and describe various
13 alternative routes in Nevada that are admittedly capable
14 of meeting the applicant's main objectives. These are
15 assessed as being less desirable than the proposed
16 project from the standpoint of meeting those objectives
17 for a number of reasons.
18 One is that additional capacity is thought to
19 be needed in two years, which would be sooner than the
20 alternatives could be built.
21 The alternatives would have to traverse
22 congested urban areas. No information is available to
23 show that the alternative routes would necessarily
24 create fewer significant environmental effects.
25 However, no explanation is provided why immediate
26 requirements could not be satisfied by projects such as
27 the construction of a 120 kv line from the East Tracy
28 substation to the Silver Lake substation along an

existing utility corridor other than to observe that a 2,000 foot separation distance if required to be infeasible.

In addition, a number of significant environmental effects that are identified by the draft environmental report are not assessed in terms of the alternatives to answer questions such as whether there are alternatives that would disturb fewer cultural resource sites, whether there are alternatives that would affect fewer existing residences, whether there are alternatives that would affect fewer recreational areas or recreational areas that are less intensively used, whether there are alternatives that would cross fewer or more lightly used roads or rail lines, and whether there are alternatives that would traverse areas of lesser scenic quality or areas that are less susceptible to scenic degradation.

Finally, one of the purposes of the hearing here tonight is to see whether the conclusions of the draft environmental impact statement, which are tentative until the statement is made final, that various other aspects of environmental quality, such as air, biological, land and water resources, will or will not experience significant environmental effects that cannot be mitigated to an acceptable level.

If any of you have any facts that show that the proposed siting of the transmission line would create other significant environmental effects that

cannot be made insignificant by mitigation, you should certainly speak to those issues.

The purpose of posing these questions, and at this point they are questions and not conclusions, is to demonstrate some of the issues that should be considered to make certain that the final environmental impacts will be described as completely and accurately as possible. You will probably have others.

If the final report continues to identify significant environmental effects on the environment that cannot be substantially mitigated, the Commission must find that specific overriding economic, legal, social, technological or other benefits of the project outweigh the significant effects on the environment before it can approve the project.

I'm going to be taking the speakers from the cards that have been collected and numbered. If you haven't filled out one of these pink cards, please do so, and I'll be glad to take you.

If I mispronounce your name, I apologize in advance. And if I misspell your name, please correct it for the court reporter. I'd like to ask each of you to come to the podium there to speak so that you'll be close by the court reporter.

And the first speaker I have is Mr. Richard Hill, H-i-l-l.

Mr. Hill.

STATEMENT OF MR. HILL

MR. HILL: Is this working or --

MS. HALLIGAN: You probably don't need it.

MR. HILL: I don't know. Can everybody hear me? I guess.

As you just mentioned, my name is Richard Hill, and I have property in Honey Lake Valley. This only takes up a small, little portion of this proposed line, but just to show you all, unfortunately it does -- I don't know if you can all see it (indicating), but it goes right smack-dab across this 50-acre piece, right through the center of it. And then it takes off another 40 acres going through that quarter of this quarter section. And so I'm greatly concerned about it.

However, as I understand it -- well, to make it clear, if you want it for the record, that's in parcel 139-20-04, Lot 1, is that top 50 acres. And it goes right through the center of it. And then Lot 2 just below it, it takes off the corner of it, which is about one-quarter of that lot. And then the other section or parcel below that, 139-20-08, and it goes through the top right-hand 40-acre quarter of it.

And so being as this is really to see how the EIS does come out, I mean it's here. I now understand it's for the purpose of seeing if the impact is substantial, or if it's right, or if not, give all of -- all of your ideas and opinions about it.

Well, my biggest concern, of course, is going

across the property. And I asked earlier about -- and if some of the rest of you, it may go across your properties as well. And so you may be interested in the same answers. And what it was, excuse me, but if it crosses your property, what do they do? What do you do?

Well, he mentioned they propose an easement across your property by the power company and then they will try to get it as inexpensively as possible.

Well, and there's even the possibility, because this is out through desert land mostly, that it's condemnation-type proceedings and that those values are minimal.

Well, that's not very good for the land owner, and it isn't, but that's the way it works. And my concerns are just what is and how is it to be handled and when do we see this. Well, this comes later. This is beyond the EIS.

So another thing that it said in the documents that we received, those -- that one that you have on the table there and I have a copy of, it talked about the Tuscarora pipeline also was running parallel with it most of the way.

Well, just happened to be when I found out this evening where this Tuscarora line does go, it actually veers off into Nevada and doesn't cross our property, my property. So that isn't a concern really for me, but it may be for a bunch of the rest of you.

So I think the impacts study doesn't explain where that Tuscarora pipeline is. It mentions it a half a dozen times but doesn't say exactly where it is, because I didn't find out till this evening that it didn't go on our piece of property. It actually runs into Nevada more. TS. 1-1

And so I wondered and then brought up, well, why wouldn't this entire line do that, because it's for Nevada. Why doesn't it go over and follow the pipeline over on the Nevada side? TS. 1-2

And that's a good question, too, that we might hope to -- that will be answered in the EIS. And that's really -- I guess my five minutes are about up anyway, and that's about all I have. And thank you very much. I hope that some of these are able to be answered maybe in the talks afterwards, I mean the discussions afterwards. Maybe they will be.

ALJ CAREAGA: Thank you, Mr. Hill.

MR. HILL: Thank you.

ALJ CAREAGA: The next speaker who has signed up to speak is Peggy Lera, L-e-r-a, Bowen, B-o-w-e-n.

Ms. Bowen.

STATEMENT OF MS. BOWEN

MS. BOWEN: My name is Peggy Lera Bowen, and I'm president of Friends of Rancho San Rafael Park in Reno, Nevada.

And the reason I'm up here tonight is I'm having surgery on the day that they are having the

public hearing in Reno, so I hope you don't mind me taking a little bit of your California time, but I need to address some issues that are of grave concern to us.

It wasn't until the 16th of last month that I actually went to any sort of public workshop or anything related to this plan of the Alturas power line. The people in Washoe County and in the Reno area specifically have really not been kept informed as to this power line's concept, its implementation or its being built.

We went to the workshop that was held by the Aspen Group at the Airport Plaza, and we were many of us who were there. There were 24 people present that evening, and many of us who were present were shocked by the lack of information that the Aspen Group had to the actual reality of where this line was going within our township.

We're told that initially that they tried to take it east of Sparks, S-p-a-r-k-s, which as they say, Reno is so close to hell you see sparks sometimes. Sorry about that, but that's an old -- the importance of it is the initial concept was to take it east of that community. And, in fact, the Sparks community reacted with, It's not healthful, it's not safe and it's going to be taken for a proposed regional park, and we don't want it.

Then it was suggested to go through another corridor, through Reno itself. And again the powers

that be, including some of the -- and I don't know how to put this, but I'll put it along economic lines -- the more wealthier powers that be said, we don't want it, and that concept was trashed. They never got to a public hearing. They never got to a workshop. It was pretty much the talk of the communities and the powers that be that stopped those two concepts.

So now, all of a sudden, we have it coming in on the east side of Peavine, coming from -- through the Horizon Hills, Anderson Acres, communities long since established in this area.

And the Aspen Group told us that -- we said, Why haven't you been contacting anybody, and why haven't you been holding major hearings and workshops in Nevada?

And the response was because this was being handled by Cal Edison and PG&E, and therefore they were -- that is the response that we were given via media, press. And local elected representatives were being told the same thing, that because this was basically a California project, which really perked my ears up tonight to hear otherwise, that it was being handled by those power entities and that Nevada had little or no say when it crossed into our borders, as far as the Reno, Washoe County areas existed. And so we all went crazy fast.

What you might not be aware of is in 1979, the people of Reno during very sparse economic times passed

TS. 2-1

a bond issue to purchase the property of Rancho San Rafael, which was a true working ranch at the time and later made it into one of the nicest regional parks that you can find.

And the master plan for this park, which has been done twice, every single time the public and the community have worked together in public hearings to create a park of open concept.

And by putting the power lines where they are going, the Aspen people were unaware that we had added 181 acres, a 181-acre lot to the park with parts taken our for the dam site, an earthen restraining dam site, and that we are working now on another -- the new boundary created or buffered with the Forest Service land. And we are in negotiation for land swap with the Forest Service to add another 158 and 28/100ths acres to the park. And there is a little piece of City of Reno land.

But what's happened with your power line is almost a domino effect. We have worked very, very hard to convince the Parks Department that we the people of Reno want additional land within our park. We'll almost -- by the time I hope I finish that we will have almost doubled the size of Rancho San Rafael Park. And we're talking about getting over 800 acres by the time we are done for a park in the city of one of the fastest growing states of this nation and one of the fastest growing areas within that state, and having a park, a

TS. 2-1

massive, wonderful, quiet, tranquil, open-space concept park.

We are not talking rides. We are not talking, you know, doing your thing. We are talking a place where people can go and enjoy with their family and jog and picnic and do those sorts of concepts within the park. That's the basis of the master plan.

Where your line will come -- and I hope you don't mind. I took the liberty to bring you a couple of photographs to show you why this has us very, very concerned. I'm going to do it up here, I'm sorry -- what we are talking about is right where the earthen dirt is here, that's the actual earthen dam spillway site.

And what happened is in 1986 massive flood waters came down through Rancho San Rafael Park in a north-to-south fashion. So you can put it on the -- and later after it came through the park, it went in an eastern fashion across Virginia Street in front of Lawler Event Center, went through the University of Nevada Reno's campus and out across the freeway, across the street down into lower socio-economic housing, HUD housing areas within our community. It just was a massive flood. And so we have been working since 1987 to have this dam site. Well, the domino theory now enters.

If in fact the line comes down, as we're told, cuts across here (indicating) -- these pictures were

TS. 2-1

taken two years ago. This is even filled in with housing now. You have roads where the line is coming right down near housing, and you have it coming through what we are trying to obtain, the 158 acres within that, 158 and 28/100ths acres within that saddle. The barrow pit here in this area, the power line will go right through the barrow pit.

What the subject of discussion in Reno has been is whether or not they wanted to obtain more land for the park that would have a barrow pit in it. Part of the mitigation of that Evans Creek Dam Project was to bring back the barrow pit area as close to what it was with the material missing, after they had taken the material out.

Now the Parks Department didn't even want a barrow pit. As I explained, it's over 10 acres out of 135 -- working on that, and we have motions by the Rancho San Rafael Advisory Committee, the Parks Commission, and by the county commissioners for Washoe County, all saying to obtain more land for the park.

They aren't going to want 130-foot electrical poles going through any part of the park. They might not ask the Forest Service to do a land swap because they will have to swap some really nice land in order to get this to be put into the park. And if they don't ask for the land to be swapped, the Forest Service has already said they don't want any property with a barrow pit on it. That was pretty basic.

TS. 2-1

82

In fact, the Forest Service is laughing right now saying the power lines -- like, hey, we want to get this off our hands because what you have is 130-foot poles coming right across to here, coming by this housing community, and a Parks Department that's now saying, maybe we don't want that land after all.

You should know that they met last Thursday night and voted unanimously, the Advisory Board of Rancho San Rafael Park voted unanimously to write to every entity available to stress that they not only didn't want the power line going through park space, they didn't want that to be able to be seen from the park because of the clear and open-space concept. And that is of major concern. TS. 2-1

But if powers that be take the route that you have now planned with those power lines and poles 130 feet tall, 15 feet in diameter poles, and put them exactly as you say, not you personally, but as the project says, then what will happen is we're told that the machinery and equipment would have to go in and leave islands or some other mechanism around those poles in order to still get the barrow material out of the barrow pit.

Because what's happened is once this is put into the park, the cost-benefit ratio for putting in that dam site is worse. The formula works -- in order to have the dam considered to be built, if we have to get the barrow material and pay for it, and under that

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

83

plan we don't have to pay for it, it would throw the cost-benefit ratio out of kilter to the point where that dam project wouldn't be considered -- I mean that d-a-m project won't be considered.

And that means that we could risk -- the '86 flood was considered a ten-year flood, where we are trying to create an earthen restraining dam with spillways that will be for a hundred-year flood.

And so once again, not only put park, but housing and the campus and low-income housing in jeopardy by not being able to restrain the flood waters that are coming down those corridors north to south and flow in the direction of flow.

And so we have a domino theory here that if in fact you keep the power line concept, you really blow what we're looking at as an open concept, open and beautiful, quiet concept for the park, visually aesthetic concept for the park. TS. 2-1

And we really took a large chunk of land. The Public Employees Retirement Program that we have in the State of Nevada literally purchased the land when it became available, held it in abeyance till the people of Washoe County could, and the City of Reno could, vote a $10 million bond issue. They sold us the property back -- PERS is what it is, Public Employees Retirement System. PERS sold it to the county for the purposes of a park with only interest that it would have accrued to the retirement system as the additional charge from the

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

selling price.

That was this community's gift to Reno and Sparks and Truckee Meadows and literally to the State of Nevada.

And the concept was an open and quiet and calm and tranquil park to be preserved, because now we knew great amounts of building and growth were going to happen. And the power line in this project is in opposition totally with that concept and in fact puts people in danger from future floods if the dam project can't go through because of where the power lines are put in. TS. 2-1

And that's my major concern, along with I honestly don't believe that the power company has looked at proper alternatives. I don't think they are considering them. They are just trying to put the line where the wheel squeaks least.

There's no reason not to break that line down. There is no reason to put the park's concept in jeopardy. There is no reason to put people's health in jeopardy, and there is certainly no reason to have this line come through in the fashion they are. They can break it down and put it through existing corridors, and they should really truly consider that, or they should consider how to have profit margins for their stockholders another way. TS. 2-2

ALJ CAREAGA: Thank you very much, Ms. Bowen.

MS. BOWEN: I took longer than five minutes. I

apologize.

ALJ CAREAGA: The next speaker is Mr. Nick -- is it Chorak, C-h-o-r-a-k.

STATEMENT OF MR. CHORAK

MR. CHORAK: My name is Nick Chorak, P.O. Box 1929, Fremont, California 94538. And I heard a lot of talk here about the pole. State of California doesn't want it. Nevada doesn't want it.

Well, I am from California, and I have property, just as the gentleman that spoke at first, although I am luckier than he is. It doesn't run across my property. But nevertheless, the State of Nevada or of Carson City or, I mean, Sparks or Reno, whoever wants electricity and they still belong to the State of Nevada, why can't they run it through the State of Nevada? They want the electricity. Run it through the State of Nevada.

Now as far as I know and can learn, I hear there is nobody going to be serviced in the State of California by that line, only Herlong Air Base. But don't bet your farm on Herlong Air Base staying open. What I hear, there is a lot of rumors on it that it's going to be shut. Whatever them politicians want to do in Washington, that's what is going to happen. TS. 3-1

But I can't see for the life of me why they can't run this line route right out of the Coal Tar Valley and Alturas over in Nevada, set an instrument out there -- we call it a gun -- and shoot right where they TS. 3-2

want to go, to Reno, Sparks, or wherever they want to go, and run in a straight line. We always think the easiest route is between two points, just as the crow flies. And I say that's the cheapest route.

Well, why can't they do that? If you have that and run a spur line over to Herlong, that will be fine. That will just be a little line. And I have gone all out through the State of Nevada. In fact, we used to run dune buggies out there, and there is not even jack rabbits someplace out in Nevada.

TS. 3-2

But here when you come through California, you are cutting down through the Honey Lake Valley. Well, you got all kind of -- you got, and I mean you got fox. You got coyotes, and you've got cottontails. You got antelope. You got deer, and then you've got the wild horses. You've got the burros that come down off the Nevada range, which I don't think they can find them enough feed up there to eat. They pasture down in the valley.

TS. 3-3

And then you've got the bald eagle. It's going to disturb the crow, the bald eagle. And that's a flyway right through this. From the north and south is for the ducks and geese. Now there is going to be a lot of collisions with that line out there.

And I read an article there that they are going to spend $60,000 for maintenance. Well, $60,000 for me is not very much money if they are going to patrol it with a helicopter. They will probably have to

spend that much just picking up dead birds out there. So I don't think it's a very good idea to run it through the valley.

The BLM and PUC and whatever, and the Fish and Game, whoever's got something to do with this ought to do it with -- I wish you'd consider all the game going out through that valley. At any given time you can see animals out there.

And we own property out there. I own a piece, and we pay taxes on it, and we don't try to run animals off there to eat. We let them eat. When the time comes to improve our property, we'll fence it.

So you are disturbing a lot of things going through the Honey Lake Valley, where I don't think you'd be disturbing anything through Nevada. So if they want the electricity, give them the poles too. That's all I have to say. If there are any questions, I'd be glad to answer them.

ALJ CAREAGA: Thank you, Mr. Chorak.

MR. CHORAK: Thank you for your time.

ALJ CAREAGA: The next speaker who has asked to be recognized is Mr. Don Battles, B-a-t-t-l-e-s, with the Lassen Municipal Utility District.

Mr. Battles.

STATEMENT OF MR. BATTLES

MR. BATTLES: Good evening. My name is Don Battles, general manager of Lassen Municipal Utility District. I'd like to speak in support of the project.

I'd like to speak in support of the California route.

Unlike the gentleman that just spoke, we certainly think that the long-term energy that will come into this valley and into Susanville will be served by Sierra Pacific Power.

Right now we are served by PG&E. We do have some problems with the service from time to time, and it's not because of PG&E. It's because of where the power comes from through the Feather River Canyon, very, very remote, very tough country.

We think that this route that comes up through Honey Lake Valley is much better, much better for service continuity. We think that in the future it'll be a lower cost power source, and it'll be a better power source. Thank you very much.

TS. 4-1

ALJ CAREAGA: Thank you, Mr. Battles.

Is there anyone who would like to speak who hasn't filled out a pink card?

There is a gentleman in back doing that now. I guess we will be off record a moment.

(Off the record)

ALJ CAREAGA: We will be on record.

Mr. Paul Herman, H-e-r-m-a-n, has asked to be recognized.

Mr. Herman, if I could ask you to come up to the podium, please.

MR. HERMAN: All right.

ALJ CAREAGA: And since you weren't here earlier,

I'll ask you, the same as I have asked other speakers, to try to speak slowly so that the court reporter can take down what you say.

STATEMENT OF MR. HERMAN

MR. HERMAN: Okay. The first thing I would like to say is about power corridors all over the West. And I would like to point out that if you look at that middle map over there, there are a lot of established power corridors on federal land. One that I think of particularly in this case would be the Pacific Intertie straight through Nevada. That's an established power corridor.

And what I see happening here is I see Sierra Pacific Power Company trying to establish a new power corridor right along the east side of the Sierra. And I think that they should take a power corridor that was given to them by the federal government and use it instead of starting a new one, such as the one that's owned by L.A. Department of Water and Power.

I don't think we need to give them any more land.

TS. 5-1

Okay. Under the area in the EIS secondary objectives and benefits, Sierra Pacific claims that the main reasons to build this power line are to improve reliability and to accommodate new growth in the Reno area.

In my scoping letter, I asked for them to give an example of how this line would improve the

TS. 5-2

reliability. And I said by doing that they could tell me where there was a power outage in Reno sometime in the distant or near past and how this line would have kept that power outage from happening. I wanted an example. TS. 5-2

I think another possible reason that they could be building this line is to wheel. I think it's a very possible reason. I think Pacific Gas and Electric makes more money wheeling than they do on residential service. And I think if you check that out, you'll find it to be true. Yet, the power company states through the contractor they have no idea how much they could make on wheeling. It says the value of these wheeling services has not been estimated. TS. 5-3

Now, I don't believe that. I wrote on that page, "big fat lie." And the reason I did it is because the kind of people that invest over a hundred million dollars in a power line aren't building it when they have no idea of how much money they are going to make on it.

Now I think you should make Sierra Pacific Power Company come up with some numbers. Since they are going to take a lot of federal land from us, I think we should see their books, and I think I want to know how much money they are going to make wheeling other power companies' power through here.

I consider it to kind of be a cursory brush-off to say something like it's not been

estimated. I don't believe it.

Specific to the Long Valley Area where I live, I would like to say that the location of the project there would cause extreme environmental damage to Long Valley. It's a big, long wetland. More easterly routes would go through a desert. More deserty terrain, less plants, less wildlife, less people. I think that the easterly -- routes on the east side of Peterson Mountain should be considered. They are dismissed in the EIS, and I think they should be considered, because there's less biological resources out there. As you move east, it becomes more deserty. TS. 5-4

I'd like to say something about the S and U alternatives, which is in order to avoid the Red Rock scenic area, BLM has requested that they jump over to the west side of the valley, continue south for a few miles and then meet back. And this is to preserve the views of the Red Rocks for tourists driving by at 70 miles an hour. Let's not forget that.

These are the kinds of differences that it would make if they -- if the S and U alternative was used instead of the T section, which goes through Lassen Red Rocks. TS. 5-5

The first one would be that it would jump over Highway 395 twice.

The second one, twice over Long Valley Creek, which is a critical wetland. And I checked in there and there is one mile of this power line that's over a

92

wetland on the S, U alternative. That's in a five-mile stretch, one mile of it is over wetland. That's not mentioned in the little kind of explanation of the alternative there.

Number three is it would jump over Scott Road twice. That's not mentioned in the book.

Number four, it would jump over Plumas-Sierra's transmission and distribution lines twice, not mentioned in the book. Union Pacific railroad, twice. Once mentioned in the book. A buried fiber optic cable on the railroad right-of-way, not mentioned at all in the book.

And it also requires the installation of five corner structures that wouldn't be required on the T section, and that means a lot of triple poles, guy wires, big mess. Caterpillars tearing the place up, stuff like that. TS. 5-5

It also runs along the Diamond Mountain fault, and one corner of it is 200 to 300 feet from the fault line. That's too close.

The BLM is charged with stewardship of our public land, and they are trying to burn off a wart using a bomb on this Red Rock thing like that to put it across the valley through a critical deer winter habitat, that's also not mentioned in the book, and then back across the valley again, across the highway again.

It's just making a huge mess. That's what I think. I don't think the line should be allowed to be

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

93

built in Long Valley at all. It should go into Nevada. It should be built within the service area of Sierra Pacific. It seems to me like they are kind of skirting the western edge of their service area, and I think they should stick to their own territory.

And I would request that the BLM reconsider the S and U alternatives. One of the main things is that it goes across those wetlands and there's a whole lot of waterfowl. There are beaver dams. I've seen sandhill cranes in there three times. I have never seen them nesting there, but they are there. And I have counted over 300 geese in one bunch on the S and U section in the wintertime. It's not listed as a deer wintering area. I say it is, and I say most of that Long Valley is deer wintering area even though just small portions of it are noted as being that in the EIS. TS. 5-5

I think the wetland crossings alone, the wildlife damage to migratory birds, waterfowl, should be alone enough to cause rejection of that S, U loop.

And I would urge that Sierra Pacific should be sent back to an established power corridor that was given to them by the federal government.

If you look at page A11 in that EIS, there is a a little map like this one, and it shows all the major transmission lines in the West. And one of things it shows is they are grouped together in two's and three's to minimize the total impact and to not spread wires all TS. 5-5

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over the whole countryside.

They should be put together, use this area, use this corridor that's been given to them, and not give them a new swath through this area here. I don't want it. It's my federal land too. And thank you.

ALJ CAREAGA: Thank you, Mr. Herman.

Is there anyone else who would like to speak at this point who is signed up with a pink card?

(No response).

ALJ CAREAGA: If not, do any of the speakers that spoke before wish to speak again?

Ms. Bowen.

STATEMENT OF MS. BOWEN

MS. BOWEN: For the record, my name is Peggy Lear Bowen.

From my gut level, I feel like a stepparent. We haven't been told the same stories. We have been told that this line was necessary to bring power to California. And we have been told only recently that it was for the mining interests in eastern Nevada, in the Carlin area, that because the mining interest in Nevada, in the eastern part of Nevada, is growing at, like, a 4 percent annual need of increase of power, that we have to bring this cheaper hydro power down from the State of Washington into Nevada to power things, such as the mining interest in the east, and to get power back into California, cheaper form of power, because Valmy is too expensive. And those are the stories we are being told.

T5.
5.6

The fact that Reno's power need is growing on the basis, I have been told, at about a 4 percent annual need, we're not talking about a great outrageous need of power within the Truckee Meadows Community. We have a very strong limiting factor, and it's called water. We have North Valley homes that can't get FHA loans over the last 20 or more years because there is not enough water to support the population that is on the grounds now.

They are pumping water in from the Truckee River to try and meet North Valley needs.

What we have here are you are being told that the power needs are going to be met by -- needed by Herlong, and we are being told it's being needed by California.

And we said, why is California power coming through Nevada -- at least me personally. I'll keep it to myself. And quite frankly, I think that maybe the almighty dollar is behind it. How can we get all that power out there and sell it and take it through where we can darn well get it through, and to heck with the people who are residents there for 30, 40, 50 years. To heck with parks that are over ten years old. To heck with anybody except for the stockholders of Sierra Pacific Power.

And we were told -- I was told that the reason we hadn't had any of the public hearings was because, as I said before, the entities of Cal Edison and PG&E were

the ones in charge of this whole project in Nevada, had not approved it, but had abdicated having those hearings in the State of Nevada.

We had one non-meeting two years ago at a local middle school. The blurb in the paper said that if Washoe County residents come see the maps, nobody will be there to answer questions but see the potential of where those lines might be.

Well, what was recommended at that point, I believe, was east of Sparks. And we hadn't had until the 16th of last month any true known workshop pertaining to this power line.

I can tell you your map of the proposed route, say, maybe page 32 of 33, Segment X and Y is incorrect. It's incorrect for the amount of housing that exists in the housing development that I showed you up on the hill in the photograph. It's incorrect as to the size of Rancho San Rafael Park. (TS. 2-3)

And I was told by the Aspen representatives that Washoe County has been uncooperative in giving them up-to-date information as to the impact this line would have. And I heard that information on March 16th at the Airport Plaza meeting in Reno.

I'd also like to read for the record, if that is permissible, the executive order that President Clinton issued on February 11th, 1994.

ALJ CAREAGA: Ms. Bowen, if possible, if you could leave a copy of that with us.

MS. BOWEN: If you have a copy machine, I'll be happy to do that.

MR. MEUNIER: I have copies.

MS. BOWEN: The purpose of this separate memorandum is to underscore provisions of existing law that can help insure that all communities and persons across this nation live in a safe and healthful environment. Environmental and civil rights statutes provide many opportunities to address environmental hazards in minority communities and lower economic communities. Application of these existing statutory provisions is an important part of this Administration's effort to prevent those minority communities and low income communities from being subjected to disproportionately high and adverse environmental effects. (TS. 2-4)

And I feel that the electromagnetic fields that come off the power lines is quite truly an adverse environmental effect. And I thought that that should also be added to the record. (TS. 2-5)

ALJ CAREAGA: Thank you, Ms. Bowen.

Your map.

ALJ CAREAGA: And Mr. Robert Elliott asked to be recognized to speak.

Mr. Elliott.

STATEMENT OF MR. ELLIOTT

MR. ELLIOTT: Thank you. My name is Robert O. Elliott. I own a hog operation in the Wendel area. And I'm specifically concerned about your alternative route

for Segment M, as in Mary.

I'm also a member of the Lassen County Planning Commission. At the time of our last hearing, I was chairman. We had our new election of officers, and I am now the vice chairman.

At that time I had the complete books of your EIR that was sent to the Planning Department, the Lassen County Planning Department, and I reviewed them quite extensively. And my main concern is, as I say, being inasmuch as that if you go to that, the proposed alternate M from all indications would be almost adjacent or parallel to my property. And because of this condition, I had to disqualify myself at our last meeting here in the first Wednesday of April. And thus the planning -- there was only three of us in attendance. No action was made by the Planning Commission regarding your project, to be passed on to the board of supervisors.

If any studies, if I find that if you do all design your power system, power lines such, I want to express the fact that I want that to be kept at least several hundred feet away from my easterly line or any line, property line of mine, because if all goes well, probably by this fall in my planning, I'll have about a 5,000 sow operation out there, and I don't want to have any of your -- any problems, potential problems by having the line that close to my property.

In fact, I would prefer to see you go follow

down along the railroad line and going into Wendel that way. And that way you would be staying a good quarter to a half a mile away from my property. And the farther you stay away from it, the happier I'll be. That completes my comment. Thank you.

ALJ CAREAGA: Thank you, Mr. Elliott.

We will go off record.

(Off the record)

ALJ CAREAGA: We will go on record.

Would you please state your name.

MS. HOUSTON: Virginia Houston.

ALJ CAREAGA: Houston?

MS. HOUSTON: H-o-u-s-t-o-n.

ALJ CAREAGA: Thank you.

STATEMENT OF MS. HOUSTON

MS. HOUSTON: I came to Reno in 1950. I've listened to, I've read in the paper, I have heard friends' discussion. I can prove nothing. I have no notes, but the lies that are going on from Sierra Pacific continuously.

My son, who is now -- one of my sons who is now retired and living out of state was an auditor for the State of Nevada. And it would come into the paper, Sierra Pacific is requesting a rate hike. Then it comes into the service commissioners -- Public Service Commissioner would not give them what they wanted. He says, Mom, don't worry. They have got six others of the same thing backed up waiting.

Also, he said, you want to see creative bookkeeping. A young man mentioned he wanted to see the books. Forget it. My son said if they want to raise the gas hikes, they use losses and expenses from the water and the electric and switch them.

ALJ CAREAGA: A little more slowly, please.

MS. HOUSTON: I'm wound up.

ALJ CAREAGA: I know.

MS. HOUSTON: If I could get out of Reno or live somewhere on my own just to get away from Sierra Pacific, I would.

Now they mentioned the other ways we are going -- they are going to decrease the rates. Well, you know what the means. That means down the road a couple of months all of a sudden we're going to triple what we had in the first place. They spend more money on public -- building up public goodwill, and they could use this money to put it into service.

We need them, yes, we need them. One of my friends who died, God love him, just a year ago, he said the best stock he ever owned was Sierra Pacific. They were always raising our rates to take -- I'm sorry. You are just doing your job. I can't hold it in. I'm 72 years old, and as far as being white-washed, don't turn your back on Sierra Pacific. They have the monopoly there, on water, gas and electricity, and they sock it to you.

Now that I understand they have had to make

them -- they have had a decline financially here lately and let a lot of people go on early retirements. And they have merged with another company.

I can remember when they were telling us we were going to have to pay for a new power station. It was going to reduce our rates dramatically. What did we find out in the paper later?

Sierra Pacific is selling power off in Idaho somewhere, and that's it. I'll go sit down now.

ALJ CAREAGA: Thank you.

We will be off record.

(Off the record)

ALJ CAREAGA: Back on the record.

During the past half hour or so, we have been off the record in informal questions and answers concerning environmental impacts, the effects on land owners of the process. And as a result of that, Mr. Herman would like to add to his earlier remarks regarding one issue that came up.

Mr. Herman.

STATEMENT OF MR. HERMAN

MR. HERMAN: Okay. I would just like to ask the question, how much power is lost in transmitting from the Pacific Northwest to Reno, percentage? (TS. 5-7)

I would also like to ask -- it was kind of a skirting reference to the Pacific Northwest and the fact that the power generation scheme up there is going to change in a fairly large way because of endangered (TS. 5-8)

salmon, and that they are not going to be able to hold all that water back. They are going to let some through for the fish.

And if that's where the power is coming from, that should be addressed, because there's going to be also some of their power generating capacity on the Columbia River up there, just like what happened with the spotted owl in Susanville. And everybody around here knows what happens. They cut down on the timber, down to 40 percent of what it was. And that could happen to the Columbia River because of salmon. And I would like that addressed in the EIS. TS 5-8

ALJ CAREAGA: Thank you.

Yes, sir.

MR. ELLIOTT: I'd like to add something to the record.

ALJ CAREAGA: Mr. Elliott will be adding to his remarks.

STATEMENT OF MR. ELLIOTT

MR. ELLIOTT: You called upon me so fast as I came into the room that I didn't get a chance to collect my thoughts. I think I made a mistake in that I think I said that I wanted you to stay 100 or 200 feet away from my property line. And I meant a hundred -- I mean 1,000 to 2,000 feet away. I wanted that corrected.

Secondly, I wanted to also say in addition to owning that big hog operation out there, I'm also a real estate broker. And I was commissioned by the Tuscarora

people to do their appraisal and -- of the property within Lassen County from the Lassen County border in the north for their proposed line to the Nevada border.

And so I am quite familiar with most of the areas that your proposed power line is to go through, having been on most of that property as you are following that line in many places along that line. I not only did the appraisal for them, but I also attached dollar values to the acreages as I felt it -- what the acreage was worth in what areas, and then went through. And if any of that could be of help to anybody, they'd have have to go to Tuscarora to get permission to use this. Thank you.

ALJ CAREAGA: Thank you, Mr. Elliott.

Is there anyone else who would like to add to their remarks or hasn't yet had a chance to speak?

Ms. Bowen.

STATEMENT OF MS. BOWEN

MS. BOWEN: Peggy Bowen.

One thing I didn't note for the record is that I do not live anywhere near where the power line would come. I live on the other side of the City of Reno. So this is not concerning my personal property as such, although I consider the park as being, as one of the citizens of this area, that that park's my baby, that that's our park.

Secondly, I for the record need to note that many persons with whom I work and speak constantly about

the line in the last month have suggested why not use the Nevada alternative. And I have to say after the information presented here tonight, why not do your major line through existing corridors, bringing this cheaper power down from the State of Washington, if that's your intent, take it out through Valmy into the mining areas and Carlin or wherever the power is actually needed, and then if you are truly concerned, Sierra Pacific Power, about the growth of Reno's need for power, you use smaller lines and take-offs from that line to bring it back into Reno?

TS 2-6

Do not -- and I'm going to be quite frank. I don't think you need to have a 345 k volt line. "Kill", whether you spell it k-i-l or k-i-l-l, still is kill. Kilovolt lines do damage. They are harmful to living things, whether animal or plant. They go through existing dwellings, existing dwellings by things that are alive on earth.

You do have an electromagnetic field that I don't think has been properly addressed in any of the reports as far as its effects on that which was living should still be living after your line goes through.

And I think if you take it in smaller responsible lines that we can do it that way, but take the power where you are actually going to sell it. Don't be using the community of Truckee Meadows as an excuse to bring it into Reno, if that's not truly where the power needs are.

And I think it would behoove the magistrate of the hearing to have it looked into as to the real potential growth in Reno as far as power needs go to see if the justification for this line is in fact a reality or what somebody would like the perception to become the reality. Thank you.

ALJ CAREAGA: Thank you.

Is there anyone who would like to speak before we adjourn?

Yes, ma'am, would you please state your name for the record and spell it for the court reporter.

MS. EIDE: Do you need this pink card?

ALJ CAREAGA: Yes, please.

STATEMENT OF MS. EIDE

MS. EIDE: I'm Sue Eide, E-i-d-e. I'm the executive director of the Lassen County Chamber of Commerce here in Susanville. Last year the board of directors didn't do an in-depth study, but we did look at this possibility, and we voted in favor of this project.

The reason we voted in favor of it was to bring additional needed power to this area.

We certainly did not vote in favor of this project to bring harm to anyone's property or their lifestyle or anything else. That is one of the reasons that I asked the question I did earlier. If this was some new technology or just more of what we had, because that was our understanding, that it was power that was

coming from a different area and in a new corridor, but that it was power just as we know it now. Thank you.

ALJ CAREAGA: Thank you.

Is there anyone else who would like to be heard?

Mr. Hill.

STATEMENT OF MR. HILL

MR. HILL: On page ES-32 in the fourth paragraph, that's the one next to the bottom, it says right in the middle of it,

"...considering a minimum setback of 300 feet from the transmission line or substations of any future occupied structure on parcels crossed by the Proposed Project."

Sounds to me like this is is the summary. Maybe the EIS says something different, I don't know, but this says 300 feet setback. That means 600 feet, 300 on each side, not 60 feet. Is this an error that is on this, is on page ES-32?

TS. 1-3

ALJ CAREAGA: We will go off record.

(Off the record)

ALJ CAREAGA: We will be on record.

Mr. Hill had finished his statement with a question, which I mentioned would be addressed in the final impact statement.

Mr. John Baxter from LMUD, L-M-U-D, has asked to be recognized.

STATEMENT OF MR. BAXTER

MR. BAXTER: My name is John Baxter, and I'm a director with Lassen Municipal Utility District. And I would like to take a little heat off Sierra Pacific Resources and the fact that Lassen was the originator of bringing this line from Alturas to Lassen County.

We didn't really have the intention of moving on to Reno, and we didn't have the intention of a 345 line either, but we were looking for a source of lower cost power to serve this valley and the people in this community.

There is a lot of you may know the reason that Lassen was formed, which was because of high cost power and the source from Pacific Gas and Electric Company back in the mid-'80s.

TS. 9-1

Now the district wasn't formed to make money, and the district wasn't formed to serve any task master other than to provide lower cost rates to the people, the community. I believe it was our intention to bring this power down because people in the community said, Why are we paying those high rates and our neighbors to the north have low-cost power from Bonneville.

We spent several thousands of their dollars trying to get this lower cost power to this community. There's such a thing as the Northwest Power Act that prohibits us getting Bonneville power, and there were other obstacles in the way of bringing it down at that time. And we looked to Sierra Pacific Resources to

maybe help us in this endeavor. We couldn't afford, little Lassen Municipal, to bring a hundred million dollar line or, in our instance, maybe 20 to 30 million dollars for our needs, because we only paid $24 million for our entire entity.

This project has been on the shelf since 1990, and there's a lot of work that's gone into it, and it will possibly benefit the people of this community. We believe that it will.

We have worked for the last six or seven years for lower rates for these customers of ours, and we have a contract with Pacific Gas and Electric Company to provide those rates at this time. But those rates are only solid for about the next nine years.

TS. 9-1

This project, if it goes, is looking two or three years more to be built. It's hard to get a power line built to serve people. It's hard to pass the environmental prospects. And this is the greatest thing in the world, to be able to come here and complain, to be a proponent or to be against the project, but I believe that this project needs to be done.

The customers in Reno, you have lower cost power than we do. The people to the north of us, they have lower cost power than we do. Plumas-Sierra customers, they have lower cost power than we do. But we bought this system in 1988. Chester was part of this system at that time. They have elected to go with PG&E. They had lower cost power than we did. Today, we

have lower cost power than they do.

We are a public entity. We don't pay stockholders. And as much as you may hate investor-owned utilities, I have some objections to them, and I -- on the other hand, we work with them. I believe that this project is a good project. I believe that this project is going forward at this time because of Lassen, because we initiated the project, and we feel that it's necessary.

Now I can't address your problems from this point to Reno, because that isn't why we wanted the project. But I know that if it doesn't go that way, it's not coming this way, and it's not going to help our constituents if it doesn't come.

TS. 9-1

Now I believe that the reason this meeting is here is so we can address the items that bother everyone. The spotted owl, the eagle, the strutting sage hen -- I've heard it all. There are a lot of things to be addressed, and some of it doesn't bother me, some of it does. And I think we -- that's what the process is for.

But I really believe that just because someone has theirs, that we can't let someone else have theirs also. And if it means passing through our community to do it, I'm for it.

But I can address the fact that now Reno doesn't really need this for the power that they have today. This is a back-up system. They had a line go

down a few years ago where they had a brownout or blackout whatever you want to call it. If they had had this system as a back-up, that wouldn't have happened.

I'm a proponent for the project. I believe that it's necessary for the public good. That's why this district was formed, for the public good. And I think that we need to look past our own individual needs for those of everyone. Thank you. (TS. 9-1)

ALJ CAREAGA: Thank you, Mr. Baxter.

Ms. Houston, I will recognize you briefly to add to your remarks.

MS. HOUSTON: You might as well leave me off the record.

ALJ CAREAGA: We will be off record.

(Off the record)

ALJ CAREAGA: We will go on record and recognize Mr. Baxter for the purpose of adding to his remarks

MR. BAXTER: Yes, I want to add that Lassen Municipal Utility District is currently negotiating with Sierra Pacific Resources for capacity on this line and a substantial portion of the 50 megawatts of capacity on the line. Even though we have no intention of taking that capacity immediately, this is for future planning, and it would probably be within the next ten years. But this is -- you know, we have to plan that far away. (TS. 9-2)

Our current contract ends in nine years, and that contract is a favorable contract at this time. But at the end of that time, our plan is to possibly put in

a substation out in the Wendel area and bring that power here. And I want it known that this is part of our master plan for the district. (TS. 9-2)

ALJ CAREAGA: Thank you, Mr. Baxter.

I think with that we will close the formal portion of the hearing. And again, we will be around for a bit longer to be with you informally and answer any remaining questions that you might have.

Thank you all for coming.

We will be off record.

(Whereupon, at the hour of 7:45 p.m., this matter having been continued to 6:00 p.m., April 19, 1995 at Loyalton, California, the Commission then adjourned.)

* * * * *

CACD - Ms. Halligan

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGE RICHARD CAREAGA, presiding.

Transcripts - Loyalton

In the matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.

Application 93-11-018

REPORTER'S TRANSCRIPT

Loyalton, California
Pages 369 - 399
April 19, 1995
Volume 3

Reported by: Maureen B. Inchauspe

H.C. Kaufman, Jr., Official Reporter
PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

1
2
3 INDEX
4
5 STATEMENT OF: PAGE
6
7 MR. SKEEN 377
8 MS. LOVERIN 378
9 MS. ELDRED 385, 398
10 MR. GUTMAN 387
11 MS. LEWIS 389
12 MS. ZEBRACK 389
13 MR. BEALS 392
14 MR. HERMAN 394, 399
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

LOYALTON, CALIFORNIA, APRIL 19, 1995 - 6:00 P.M.

* * * * *

ADMINISTRATIVE LAW JUDGE CAREAGA: Good evening, ladies and gentlemen. My name is Richard Careaga. I'm an administrative law judge for the California Public Utilities Commission.

This is the time and place noticed for a public hearing to receive oral comments on a draft environmental impact report and statement concerning the proposal of Sierra Pacific Power Company to construct a high-voltage overhead power transmission line from Alturas, California, to Reno, Nevada.

The application number assigned by the Commission to this proposal is A. 93-11-018. Commissioner Knight is the assigned commissioner.

The United States Bureau of Land Management has assigned Case No. CACA 31406 to the proposal.

BLM is working with the California Public Utilities Commission to prepare this environmental impact report statement to assess the environmental impacts of the proposed Alturas 345 kv transmission line.

This public participation hearing provides the public comments on the draft environmental impact report statement prepared by the Public Utilities Commission and BLM.

BLM, in accordance with the National Environmental Policy Act, will consider and respond to

all oral and written comments as part of the preparation of a final environmental impact report and statement for the proposed transmission line.

The BLM and other federal agencies will use this final EIR/S as the basis for their decision to approve or deny the application by Sierra Pacific Power Company for a transmission line right-of-way across federal lands.

The federal agency decision will be coordinated with the decision of the California Public Utilities Commission on the application now pending before the Commission.

The hearing tonight is being stenographically recorded by a court reporter. The transcript from this hearing will form an important part of the official record that the commissioners of the Public Utilities Commission will consider when certifying the final environmental impact report and statement that will be prepared.

It's very important that the transcript accurately record what you say here tonight. For that reason, I'll need your help.

First, speak slowly, and I'll give you a hand signal if I think you are speeding, and, if necessary, I'll interrupt you so that the court reporter will be able to take down what you have to say.

Second, of course, please speak one at a time. If you do need to talk to someone to exchange

information, I ask that you step outside to do that and come back in when you are ready to proceed.

Third, I'll ask each of you to limit your initial remarks to about five to seven minutes so that everybody will have an opportunity to speak. Once everybody has spoken who wants to, I'll recognize people again for the purpose of adding to their remarks. And we'll take as much time as reasonably necessary.

We'll take regular breaks at about five minutes or so before the hour, or whenever the court reporter needs to change her paper tape, and I'll indicate that by saying we are off record, and what is said won't be recorded.

At some point during the evening after everyone has had the chance to speak, I'd like to open up the floor for questions and answers. That will not be recorded as part of this but will help facilitate the exchange of information that you may need to make your comments.

After that, if anyone wishes to add to their remarks or to speak for the first time, we will go back on the record and I'll recognize you for that purpose.

Next, I want to remind you that you don't have to speak here tonight to make your views known. If you are not comfortable speaking in public but want to comment, you can do so in writing. You can do this by postmarking your remarks by mail before May 3rd, on or before May 3rd, 1995.

Julie Halligan, with the California Public Utilities Commission, can give you the address.

Please be aware that this public hearing tonight is for the purpose of gathering information about the content and the analyses of the draft environmental impact report. The most helpful contribution that you can make in that connection is to point out any facts or issues that the environmental impact report and statement may have overlooked or inadequately addressed.

If you have questions concerning the data in the statement, its conclusions or analyses, the representative of the Aspen Environmental Group, which is the independent consultant retained by the Commission and the BLM to assess the impacts of the project, will be available to answer questions after everyone who wishes to has made an initial statement.

There will be another hearing next month on the proposed project on May 22, 1995 beginning at 9:00 a.m. I'll conduct evidentiary hearings on the proposed project at Susanville in the City Hall Council Chambers, 62 North Lassen Street.

The hearings will continue until May 26th, 1995 unless sooner complete.

The purpose of the hearings next month is to take the testimony of the project proponent, Sierra Pacific, and others concerning whether the proposed project is in the public interest, convenience and

necessity.

At the beginning of those hearings, any person in the public who wishes to may make a concise statement in support or opposition or commenting upon the proposed project without taking a position one way or the other. Such statements will not be under oath or subject to cross-examination.

The Commission may consider such statements in reaching its decision, but it will not rely upon them in making findings of fact or conclusions of law.

At those hearings, any member of the public may also participate as an interested party by filing on or before May 4th, 1995 a written motion with the Commission stating the issues that you wish to address and describing the extent of your planned participation, or you may attend the hearing and make a formal appearance.

You may, but you are not required to, be represented by a lawyer. If you appear as an interested party, you may introduce sworn testimony on or before May 4th, 1995, cross-examine witnesses, present sworn rebuttal testimony in writing or in person and make written argument concerning the evidence and the applicable law through formal briefs.

Your participation in this formal, court-like proceeding will be governed by the Commission's Rules of Practice and Procedure.

Following the completion of the final

environmental impact report and statement, the Commission will determine if the final report and statement meets the requirements as to form and substance of the California Environmental Quality Act.

The Commission will not decide upon Sierra Pacific's application until it has certified the final environmental impact report and statement.

As a result of the contents of that final report and statement, the Commission may be required to reach specific findings concerning significant environmental impacts of the project prior to its approval.

The most obvious question about the proposed transmission line project is why a project that is needed primarily to meet projected demands in the Reno-Sparks area is being routed through California rather than Nevada.

The draft environmental report has considered and discussed alternative routes in Nevada that are admittedly capable of meeting the applicant's main objective. However, these routes are deemed to be less suitable than the proposed route for three primary purposes.

First, additional capacity is projected to be needed in two years, sooner than these alternatives could be built.

Second, the alternatives would also have to pass through congested urban areas.

And third, no information is available that shows the alternative routes would necessarily create fewer significant environmental effects.

However, no explanation is provided why the immediate requirements could not be satisfied by a 120 kv line constructed from the East Tracy substation to the Silver Lake substation along an existing utility corridor other than to observe that an existing 2,000 foot separation distance if required to be infeasible.

No explanation is offered why alternatives weren't considered that would avoid congested urban areas.

The report contains no specific discussion of several of the significant environmental effects that have been identified by the draft impact report. And among these are the following:

Are there alternative routes that would disturb fewer cultural resource sites or comparable number of resource sites of lesser significance?

Second, are there alternatives that would affect fewer existing residences?

Third, are there alternatives that would affect fewer recreational areas or recreational areas less intensively used?

Fourth, does the draft environmental report adequately consider alternative routes for the transmission line that would cross fewer or more lightly used road and rail corridors?

Fifth, does the draft report adequately consider all alternative routes less susceptible to degradation?

Finally, according to the report, the siting of the proposed transmission line would diminish the scenic quality of specific -- on Highway 395, impacts for which no mitigation is available.

Does the draft report adequately consider alternative routes through areas removed from rest stops and main traveled roads?

Also, according to the report, the proposed transmission line would have effects on other aspects of the natural environment, including biological resources, air quality, land and water resources, public safety and health and other social conditions that would not be significant after taking into account mitigation measures.

Therefore, the final question that you may want to address is whether there are facts showing that the proposed siting of the transmission line would in fact create significant effects on these other aspects of the environment that cannot be made insignificant by mitigation.

The purpose of posing those questions is to demonstrate some of the issues that should be considered to make certain that the final environmental impact report and statement will be as complete as possible. You'll probably have others. But if the final report

continues to identify significant environmental effects that could not be substantially mitigated the Commission is required to find that specific overriding economic, legal, social, technological or other benefits of the project outweigh the significant effects on the environment before the Commission will be able to issue an approval.

Next I'm going to be taking the speakers from the pink cards that have been collected and numbered. If you haven't filled out one of these cards yet, please see Tom in the back.

And if I mispronounce your name, I apologize. If I misspell your name, however, I not only apologize but ask you to correct it for the court reporter.

So we will begin with the first speaker, who is Jim Skeen, S-k- --.is it Skeen or Skeer?

MR. SKEEN: Skeen, S-k-e-e-n.

ALJ CAREAGA: Mr. Skeen, would you care to speak, sir?

STATEMENT OF MR. SKEEN

MR. SKEEN: Well, just briefly. I think the remarks that I had in mind are probably not appropriate for this, but I would just like to say that in Plumas we share a problem in future power supply with our neighbors in Susanville, and that in some point in the future, we believe this project will help us solve our problem.

TL 1-1

ALJ CAREAGA: Thank you, Mr. Skeen.

The next person who has asked to be recognized is Jan Loverin, L-o-v-e-r-i-n, representing Citizens for the Preservation of Long Valley.

ALJ CAREAGA: We will be off record for a moment to allow everybody to get settled.

(Off the record)

ALJ CAREAGA: We will be on record.

During the recess, I identified Mr. Humm, Ms. Halligan and Gary Meunier for the information of those attending.

Ms. Loverin, please proceed.

STATEMENT OF MS. LOVERIN

MS. LOVERIN: My name is Jan Loverin, and I am speaking on behalf of Citizens for the Preservation of Long Valley.

The Citizens for the Preservation of Long Valley feel that this EIS is defective. We feel it is defective because it has eliminated or has a shallow view of the Bordertown substation.

And what I have done here is I have requested from Sierra Pacific this routing map that was done by a company they hired named Resource Management Incorporated. This routing map does show various constraints. All of these colors are tied to various constraints, such as the U.S. Fish and Wildlife Service, Indian reservations, railroads, engineering sensitive, biological constraints, et cetera.

TL 2-1

ALJ CAREAGA: Excuse me, Ms. Loverin, can I ask you

to you speak a little more slowly, and so that I'm oriented, can you tell me about what the area that we are looking at is?

MS. LOVERIN: Yes. Let's see. Here, down here would be Reno (indicating). Up there, north, would be Alturas. And the area I'm referring to or will be referring to is right here. It's called Bordertown. It's near the California-Nevada border.

ALJ CAREAGA: Thank you.

MS. LOVERIN: What I found to be very intriguing about this map is that there would be numerous constraints, how difficult it is to route the transmission line. All these different things are significant routing constraints. TL. 2-1

What I also found to be very interesting, however, was all the different -- maybe see it a little bit on this one. These here are actually routing -- various routing lines, varying routes.

You can see here all the different routes that were looked at in preparation for development of the preferred routing for this area. The part that was the most intriguing to me is this one inch right here (indicating) that is the Bordertown area. And as you can see, there were no alternatives given for this site. None.

Out of 160 miles there are alternatives for every single area except for right there. That's because this study was done in April of 1993, and the

property right here that was purchased by Sierra Pacific with the intent of building the substation was purchased in January of 1993. The routing has basically been determined, the preferred routing has been determined by the Bordertown area.

They mention many different constraints here, as I said, biological, wetlands, visual constraints, but this is the constraint -- this is the reason the Citizens for the Preservation of Long Valley feel this entire route was developed, was because of Bordertown. TL. 2-1

And we feel that the EIS has not adequately addressed this. Let alone it did not give the residents in this area any alternatives. It did not give Sierra County any alternatives. The EIS did not look at the fact that the property in this area, their original purchased property -- can I stop here just one second?

ALJ CAREAGA: We will be off record.

(Off the record)

ALJ CAREAGA: We will be on record.

MS. LOVERIN: This is a map that I have had blown up of the Bordertown area, so we sort of know a little bit more about what we are talking about.

What I did here is I took the basic map from the EIS. I superimposed it on a topo map to give a fuller view of Long Valley. This here is the alternate Bordertown site. That is the site that was purchased in January of 1993. TL. 2-2

When we informed Sierra Pacific after they had

1 purchased this land that it was encumbered by
2 conditions, covenants and restrictions, they were quite
3 surprised and immediately moved over to this parcel
4 here, a little bit north on a BLM piece of property.
5 The EIS did not acknowledge that the property
6 owned by Sierra Pacific is subject to those CC and Rs,
7 and yet it specifically mentioned it in my routing or my
8 letter, my scoping letter on May 24th, 1994. It was not
9 addressed.
10 What we would like is -- the EIS did not
11 assess why this Bordertown site was the critical
12 constraint in the preferred routing. Why does Sierra
13 Pacific want the substation there? Why do they want the
14 property in this Bordertown vicinity? TL 2-2
15 We feel it is because of the need for the or
16 the desire for the Bordertown substation.
17 The EIS stated that the Bordertown station may
18 supply additional transmission service to the growing
19 needs in the North Valley areas of Reno.
20 Our question on this is: Why?
21 There is no growth in the North Valley areas
22 of Reno because there is no water in the North Valley
23 areas of Reno.
24 This perceived need by Sierra Pacific is an
25 unjustified rationale for the Bordertown substation. If
26 there is need, then why isn't the Bordertown substation
27 located near the load center? It isn't.
28 As you can see here, there is no load center

1 near the Bordertown station. The zoning here is
2 residential. There is some manufacturing, and all of
3 the rest around it is either agriculture or general
4 rural. There is no load here. TL 2-2
5 Sierra County, which is the majority of this
6 green here (indicating), does not have in its general
7 plan to sudivide. There aren't going to be subdivisions
8 in this area.
9 The Citizens for the Preservation of Long
10 Valley also feel the cultural and historic survey is
11 inadequate. The EIS did not acknowledge that there is
12 historic significance in the upper end of Long Valley.
13 And again, I specifically stated that in my scoping
14 letter of May 24th, 1994.
15 As you can see right here, this is the
16 alternate substation site. The Old 1862 Ranch where I
17 reside is right there. It's that darkened yellow color TL 2-3
18 right there. I have a sign out front that says "Old
19 1862 Ranch," and I have two 19th century buildings that
20 are very obviously placed so passers-by can see it, and
21 yet it was not addressed in the EIS.
22 In lieu of that omission, I have hired an
23 architectural historian who has verified there is
24 historic significance in Long Valley and who has
25 suggested that let alone the Old 1862 Ranch may be
26 eligible for the National Historic Register, the entire
27 valley may be eligible for the National Historic
28 Register under Criteria A.

383

I have also pointed out those other historic sites in the valley that are known. TL 2-3

Is my five minutes up?

ALJ CAREAGA: Do you have much more?

Why don't you finish then rather than coming back.

MS. LOVERIN: Okay. We have also noticed in the EIS that many of the questions that we asked were responded to with a conclusionary response. That is, they only said, This is it. There is no reason.

Specifically, I'm referring to other venues that we had suggested for the Bordertown substation, specifically across 395 on what is property now owned by the California Fish and Game.

Basically, the EIS just said this is owned by California Fish and Game, and therefore is inconsistent with their land use goals. TL 2-4

I would like to bring it to your attention that the substation site here, the alternate and the preferred, is also inconsistent with land use goals of Sierra County.

We would like an in-depth answer. We want reasons, not just a conclusionary statement, on why alternative sitings for the Bordertown substation have not been fully considered.

In addition, I'll be quick here, the visual resource management aspect of the Bordertown property here has been very poorly done. TL 2-5

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

384

The BLM admits that, admits that very few experts have even come out and visited the site. TL 2-5

There were many omissions and errors in the EIS, but the most obvious one to me was on page C-9-18, where it states that the environmental section regarding the alternate and preferred Bordertown substation sites are surrounded by commercial and industrial zoning. Completely wrong, as you can see by this map. TL 2-6

In conclusion, the Bordertown substation sites have not been adequately addressed. As I think I have pointed out this evening, the EIS has performed only a very shallow look at what is the critical point of this project.

The BLM has not upheld its responsibility, and we are very disappointed in terms of not having people come out there for visual, cultural resources.

And in addition, it appears that the BLM is anxious to unload this piece of property and increase their holdings at the expense of Sierra County, its history and its residents. Thank you.

ALJ CAREAGA: Thank you, Ms. Loverin.

We will be off record.

(Off the record)

ALJ CAREAGA: We will be on record.

I'd like next to recognize Anne Eldred, E-l-d-r-e-d, representing Sierra County Planning Commission.

Ms. Eldred.

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

STATEMENT OF MS. ELDRED

MS. ELDRED: Yes, if I can get -- I'm not going to carry the book up there.

Basically, what I have to say is that I have found a great number of subjects in the draft EIS/EIR that were not addressed, number one being a real Nevada route.

And I say "real" because I know there are segments in the alternatives that do -- that are in Nevada, and they are addressed as a Nevada alternative. That is not the true Nevada alternative that was suggested way back in the scoping time on this project.

If the EIS -- EIS/EIR had decided after or determined after studying a real Nevada route that that was not an alternative to be picked, I might have been able to understand that, but I cannot understand how you can know what the environmental effects on a route or the environmental impacts on a route are unless you've studied them. And they were not studied. They were tossed out as not being environmentally -- or not having value to study.

TL 3-1

I found your statement earlier today, and this is not on my pink slip, but this happened after I wrote that out, but I found it interesting that one of the reasons you gave for not going ahead and studying another route at this time or other routes at this time was the immediate need within two years for more electrical resources.

And I don't think that's any reason to not study something. And I don't believe that CEQA would agree with that either.

The main objection that I have in your studies have to do with cultural resources. In particular, the National Historic Preservation Act does require that if there is a potential impact from a project that is done by a government agency on private property, that that is a -- could be a significant environmental effect.

And in the case of Bordertown, there are historic properties there which can be assumed to have significant environmental effect if this project is built the way it's planned, and you can't mitigate that. There is no way to mitigate that. And that's under the -- I believe it's under Section 106 of the National Historic Preservation Act.

TL 3-2

One request that I certainly would have is that a study be done of at least a mile and a half around the potential substations, whichever one you pick, for the impacts on historical properties and other cultural resources, including prehistoric properties.

I think your studies are too narrow in this case, because I think there are going to be major impacts. Thank you.

ALJ CAREAGA: Thank you, Ms. Eldred.

Next I'd like to recognize, if I'm reading it correctly, Ms. Annie Gutman, G-u-t-m-a-n.

MR. GUTMAN: Arnie.

ALJ CAREAGA: Arnie, I'm sorry

STATEMENT OF MR. GUTMAN

MR. GUTMAN: I'm Arnie Gutman. I am also a member of the Sierra County Planning Commission.

In reviewing the draft EIR/EIS, I had a very difficult time. In fact, I was not able to come to the same conclusion that Sierra Pacific Power drew; namely, that the proposed alternative route is the preferred route. TL 4-1

I found the draft EIR/EIS to be full of inconsistencies, a number of self-serving statements and, for example, there is a long discussion about how benign electromagnetic fields are, talking about you can derive more electromagnetism from walking across a carpet, there is more put out by an egg beater and whatever, microwave oven. TL 4-2

And that's all well and good until you get to the discussion about crossing the City of Sparks. Then all of a sudden electromagnetic fields become an intolerable threat to the City of Sparks.

Now the use of electromagnetic fields to me is a red herring. It's either very detrimental when you are going through the City of Sparks, but if you are going through Long Valley, it's insignificant.

I think one of the most dramatic inconsistencies I found was their discussion about their need to tie into the Bonneville Power Authority. There are approximately five or six references about the TL 4-3

desirability to plug into the Bonneville Power Authority. At page A-22 it says proposed project would provide direct intertie to Bonneville Power. On page 25, the project would provide Bonneville Power and Sierra Pacific Power Company with a direct connection. And on page A-33, it said a direct connection would provide inexpensive Bonneville Power Authority power. But on page A-4 it says Bonneville Power Authority does not have a firm commitment with Sierra Pacific Power Company and thus is not committed to supplying fixed amounts of power. TL 4-3

Hydroelectric operations in the Pacific Northwest are undergoing federal systems operation review which could result in a reduction of current regional hydroelectric power.

I mean there is something wrong here. If their desire to tie into Bonneville Power Authority is the main thrust of their program, why is Bonneville Power saying that we may not have power available to Sierra Pacific Power?

My feeling is that Sierra Pacific Power has a great desire to be become a transmitter and a seller of power rather than a purchaser and a seller of power, and I think it's purely for economic reasons. Thank you.

ALJ CAREAGA: Thank you, Mr. Gutman.

We will go off record.

(Off the record)

ALJ CAREAGA: We will be on record.

I'd like next to recognize Ms. Nevada Louis, L-o-u-i- --

MS. LEWIS: L-e-w-i-s.

ALJ CAREAGA: Thank you, ma'am.

STATEMENT OF MS. LEWIS

MS. LEWIS: I'd like to tell you that I have attended all of these meetings on this. I'm a layperson. I'm very proud of our Planning Commission and the people from Long Valley who are scrutinizing the proposed project.

And the way I see it as a layperson, I am not happy with Sierra Pacific Power getting this all put together and then telling people, hey, here we are. We are going to go for it.

And what I say is it amounts to greed. That's all it is, is greed.

And there is nothing sacred in the wake of it. We all know that. Thank you very much.

TL 5-1

ALJ CAREAGA: Thank you, Ms. Lewis.

The next speak is Janet Zebrack, Z-e-b-r-a-c-k, representing Citizens for the Preservation of Long Valley.

STATEMENT OF MS. ZEBRACK

MS. ZEBRACK: Hello. My name is Janet Zebrack. I'm a neighbor of -- I live in Long Valley. And it's our home. We have worked, we have all made financial sacrifices so that we could live the ranching lifestyle. We love it there. It's a very beautiful

place.

I brought some photographs to show you how beautiful it is. There is a wide variety of animal life there. There is a wide variety of plant life, and we feel that if this ugly substation is put in, it will not only destroy the beauty of our valley for our generation, but for future generations to come, and it will never be the same again.

I have two letters that I would like to read. One of them is from Bob Ramsey, who is vice president of the Comstock Arabian Association. He says this regarding the proposed transmission line project between Reno and Alturas:

"I am writing as a representative of the Comstock Arabian Association, a Reno-based horsemen's club, to oppose said project. As an officer of the organization, a Nevada corporation, I am expressing the opinion of a majority of our membership that the construction of the high power lines through and around the area near the north and west of Peavine Mountain would interfere with our members' ability to use the trails and enjoy the natural beauty of the area.

TL 6-1

"Although I recognize the need

for said improvement, I join the members of our organization in requesting that the planners seek another route some distance from the Peavine site."

And I have a second letter from Michael Tristam.

ALJ CAREAGA: Could you spell that, please?

MS. ZEBRACK: The next letter is from Michael Tristan, T-r-i-s-t-a-n, and she's president of the Nevada All State Trail Riders Association, and she said basically the same thing that Bob Ramsey says, that building this substation and all the lines, the high power lines that are going to come in as a result of it, will interfere with people who are riding horses, people who are riding bikes, hikers. Anyone that wants to go out in the Toiyabe National Forest if they are going through Long Valley will have to look at this monstrosity.

So I hope that we can do something to find another site because it's -- the power is going to Nevada. It seem logical that the substation be put in Nevada. Thank you.

ALJ CAREAGA: Thank you.

And thank you, ladies and gentlemen.

ALJ CAREAGA: The next speaker who has asked to be recognized is Tim Beals, B-e-a-l-s, representing Sierra County.

TL 6-1

STATEMENT OF MR. BEALS

MR. BEALS: Thank you very much. My name is Tim Beals. I'm a county planning director or director of public works for the County of Sierra, and I would like to address the board tonight and offer a couple of documents into the record if it is appropriate.

First of all, I would like to extend appreciation for your coming to Loyalton and conducting this hearing. As you can see by the participation, I think it's well received. And I certainly appreciate your response, and I think on behalf of the board, that appreciation was extended to each and every one of you.

I also extend appreciation to your staff for the help that they have been in this process, which is somewhat at times difficult for us all.

I'm not a member of the board of supervisors. As I indicated, I am representing them in the capacity of presenting two documents to you. There are two resolutions of the board.

The first resolution will be labeled 95026, and I can cut right to it by indicating that the resolution indicates that the board is opposed to the present alignment of the transmission line.

And I'll offer this document into the record, however you wish to do it. And you may wish to read it aloud or -- I apologize for not providing copies for each member of the board tonight.

The second resolution is Resolution 95081, and

this provides a number of findings which the county has put forward. And there is a letter going to your staff with the same document requesting the same information.

Specifically, what the board is indicating is that there's failure of the document to analyze alternative routes and sufficient justification for the preferred alternative that is represented in the document.

And the board is expressing extreme concern on the siting criteria for the Bordertown substation and objects to the many inconsistencies or lack of unless that is represented in the EIR/EIS. And as a result, the board of supervisors is requesting a 30-day extension opportunity to comment to the PUC to enable them to more formally provide comments to you in a fashion that would be helpful both to you and certainly to the applicant in this case.

We have submitted a memorandum of agreement with the power company seeking their assistance in reimbursement for some of the costs which they have offered. We have not received a formal response from them at this point, and we're getting down to the wire and I'm -- and we're in a position where we need the time to adequately address the document.

And so I would offer this document, Resolution 95081, into the record as well.

In summary, I believe that it could be adequately supported that the board is very troubled

TL 7-1

about the inconsistencies that appear in the document, the lack of thoroughness that appears to support some of the conclusions that are rendered. And quite frankly, and from my level, not at the board level, I'm very troubled with what I perceive as the lack of initiative by the applicant to take on some of the issues that have been identified by the county. They have a lot of influence over the project. I think they could be very helpful in the solution.

TL 7-1

So I would ask that this board consider the request of the board for an extension, and thank you for the opportunity to comment.

ALJ CAREAGA: Thank you, Mr. Beals.

Is there anyone else who has signed up to speak or would like to add to their remarks before we go off the record for the purpose of having a question and answer session, after which, as I indicated earlier, will be further opportunity to add to your remarks on the record if you so desire?

MR. HERMAN: I would like to speak.

ALJ CAREAGA: Mr. Herman, may I have your card, please.

STATEMENT OF MR. HERMAN

MR. HERMAN: First of all, I would like to request a 30-day extension on the comment period. I think that's a good idea.

And also, I'd like to say something about something that I mentioned last night in Susanville, and

that is the dependability of power supply from the Colorado River system.

I was listening to the news this morning, and right now they are dumping water over the dams. It's water that is not going to go through a turbine. It's there for the fish. It's there to save those salmon, and that power is going away. That's not addressed in the document, that fact. It's skipped over. TL. 8-1

And another thing I would like to say is I have read some more about the S and U alternatives that are in the middle of Long Valley where the BLM has requested that the power line not cross through the Red Rock scenic area. And in order to, quote, mitigate this, they are going to jump over Long Valley Creek twice and go four miles north and jump over and go four miles north and jump back over again crossing the highway, railroad, Plumas Sierra line and county land and Long Valley Creek all twice. And I would say that's not mitigation. It's making it way worse than it has to be. TL. 8-2

My last thing is I would like to say I want more consideration of the Nevada alternatives. The L.A. Department of Water and Power's line is very straight. It's been an established power corridor that was given to the power companies by the federal government a long time ago. It could be used for this line, and it's cursorily dismissed in this document, and I think it should be seriously considered. Thank you. TL. 8-3

ALJ CAREAGA: Thank you, Mr. Herman.

Is there anyone else who would like to speak before the question and answer period on the record?

Or again, if you wish, you can wait until after we have had the question and answer period, and then we will offer comments for the record again.

(No response)

ALJ CAREAGA: Hearing none, we will be off record.

(Off the record)

ALJ CAREAGA: We will be on the record.

For approximately the past -- ladies and gentlemen, would you please come to order. Thank you.

For approximately the past ten minutes, we have been on an informal break, and for a half an hour or so before that, 40 minutes, there were questions and answers informally. And some of those questions and answers included comments that I wish to give people the opportunity to place on the record.

Now of course, again, you may make your comments in writing by sending them care of the Aspen Environmental Group postmarked any time before May 3rd, but I want you to understand, sort of like Miranda rights, anything that you do not say tonight on the record or you do not place in writing is not going to be considered in the final environmental impact statement unless somebody else brought it up.

Your comments are valuable. They help make certain that the final impact statement is complete and

forms an adequate basis for the Bureau of Land Management, the California Public Utilities Commission and other involved agencies to make their decision in the knowledgeable understanding of what the likely effects are going to be.

So I encourage anyone who had made a comment during the question and answer period to come forward now, state your name for the record, and to summarize your remarks.

Who would like to be recognized for that purpose?

(No response)

ALJ CAREAGA: Well, hearing none, I hope that you'll consider seriously putting those in writing and sending them again to the Bureau of Land Management and the California Public Utilities Commission.

Let me read for your information the notice requirements and requests for you to make a written comment.

Any person wishing to comment on the draft EIR/S may do so. Comments should be mailed as soon as possible but must be postmarked no later than May 3rd, 1995. Written comment on the draft EIR/S must reference CPUC Application No. 93-11-018 and BLM Application No. CACA 31406. Comments should be addressed to July Halligan, H-a-l-l-i-g-a-n, and Peter Humm, CPUC/BLM, care of Aspen Environmental Group, 30423 Canwood Street, C-a-n-w-o-o-d, Agoura Hills, A-g-o-u-r-a, California

91301.

If anyone needs help with that address later on, come up and see one of us, and we will be glad to provide it to you. It's also in the notice, in the handout that's titled "Proposed Alturas Transmission Line Project," IRPP hearing handout.

Before we close this evening, and we will be around again afterwards for a bit to chat, I want to ask if there is anyone, whether or not you have spoken before, who wishes to make a further comment for the record, especially as a result of the question and answer period?

ALJ CAREAGA: Yes, ma'am

STATEMENT OF MS. ELDRED

MS. ELDRED: I'm Anne Eldred, Sierra County Planning Commission. I'd just like to, I guess, maybe bring together a couple of things that were mentioned during the question and answer session concerning other proposed interties, specifically the proposed tank line and things like that that can affect this same area if there is a major transmission line and corridor and substation immediately to the east of where we are sitting right now in Loyalton. TL 3-3

I'd like to know the cumulative effect of all of this on this county, on planning in Reno, and the cumulative effect of development everywhere where this power is either wheeled or is switched in, because I don't believe that's mentioned in this document.

Cumulative effect to me is a very important thing, and it's something that needs to be addressed. TL 3-3

ALJ CAREAGA: Thank you.

Would anyone else care to either make a comment if you have haven't done so already or to add to your previous comments?

Mr. Herman

STATEMENT OF MR. HERMAN

MR. HERMAN: I would like to add one comment, and that is, I would like very much consideration of a possible hook-up across the Sierra Valley to the Redding area. I understand some kind of corridor exists. Thank you. TL 8-4

ALJ CAREAGA: Thank you, Mr. Herman.

Would there be any other comments from any other person?

MS. ELDRED: He needs some help up there.

ALJ CAREAGA: We will be off record.

(Off the record)

ALJ CAREAGA: We will be on record.

Would anyone else like to make a comment now?

(No response)

ALJ CAREAGA: There being no further comments, this public hearing is adjourned. Thank you all very much.

(Whereupon, at the hour of 7:50 p.m., this matter having been continued to 6:00 p.m., April 20, 1995 at Reno, Nevada, the Commission then adjourned.)

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CACD - Ms. Halligan

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA

ADMINISTRATIVE LAW JUDGE RICHARD CAREAGA, presiding.

Transcripts - Reno

In the matter of the Application of Sierra Pacific Power Company for a Certificate of Public Convenience and Necessity to Construct and Operate the Alturas Transmission Line Project.	Application 93-11-018

REPORTER'S TRANSCRIPT

Reno, Nevada
Pages 400 - 472
April 20, 1995
Volume 4

Reported by: Maureen B. Inchauspe

H.C. Kaufman, Jr., Official Reporter
PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
505 Van Ness Avenue, San Francisco, California 94102

I N D E X

STATEMENT OF:	PAGE
MS. BOHN	409
MR. HOLZMEISTER	411
MR. BRESLOW	414
MR. NICOLET	415
MS. THOMASON	416
MS. HART	417
MS. KIVI	418
MR. PARROTTO	419
MS. OROZCO	420, 467
MR. PYZEL	422
MS. BURKE	423, 465
MS. PIRKLE	429
MS. GILBERT	432
MS. DAZEY	436
MR. SMYRES	439, 467
MR. WINGFIELD	440
MS. MUCKENTHALER	442, 468
MR. HERMAN	444
MR. ANDERSON	445
MR. ALBRIGHT	446
MS. MITCHELL	448, 459, 469
MR. KIVI	454
MR. OPENCRANTZ	457
MS. TOLENO	463, 470

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

RENO, NEVADA, APRIL 20, 1995 - 6:00 P.M.

* * * * *

ADMINISTRATIVE LAW JUDGE CAREAGA: We will be on record.

Good evening, ladies and gentlemen. My name is Richard Careaga. I'm an administrative law judge for the California Public Utilities Commission.

This is the time and place noticed for a public hearing to receive oral comments on a draft environmental impact report and statement concerning the proposal of Sierra Pacific Power Company to construct a high-voltage overhead transmission line from Alturas, California, to Reno, Nevada.

The application number assigned by the Commission to this proposal is A. 93-11-018. Commissioner Knight is the assigned commissioner for the California Public Utilities Commission.

The United States Bureau of Land Management has assigned Case No. CACA 31406 to the proposal.

The Bureau of Land Management, or BLM, is working with the California Public Utilities Commission to prepare this joint environmental impact statement and report for the purpose of assessing the environmental impacts of the proposed Alturas 345 kv line.

This public participation hearing provides your opportunity to make oral comments on this draft report that's been prepared by CPUC and BLM.

The Bureau of Land Management, in accordance

with the National Environmental Policy Act, will consider and respond to all oral and written comments as part of the preparation of a final environmental impact report and statement. The BLM and other federal agencies will use the final EIR/S as the basis for their decisions to approve or deny the application by Sierra Pacific Power Company for a transmission line right-of-way across federal lands.

The federal agency decisions will be coordinated with the CPUC decision on the application before the California Public Utilities Commission.

On my left is Mr. Peter Humm, representing the Bureau of Land Management.

On my right is Dr. Gary Meunier, who represents Aspen Environmental Group, which as I indicated was the environmental consultant retained by the California Public Utilities Commission and by the Bureau of Land Management to prepare this report.

Now I suppose I should give you a word of explanation why a California state employee is conducting this meeting tonight.

Of course, the California Public Utilities Commission does not have any jurisdiction over projects to be constructed in the State of Nevada. However, because a substantial portion, and indeed all but a relatively small part of the construction in terms of miles, is going to be conducted in California, the California Public Utilities Commission is being asked to

1 approve the issuance of a Certificate of Public
2 Convenience and Necessity for the construction of the
3 project in California.
4 Because the California Public Utilities
5 Commission is cooperating with the Bureau of Land
6 Management, who will be making their independent
7 assessment of the project for the purpose of the
8 right-of-way application, we have agreed that an
9 administrative law judge would be available to conduct
10 all the public hearings so that people in Alturas at the
11 public hearing we had Monday, and at Susanville on
12 Tuesday, and Loyalton last night, and Reno this evening
13 would all have the same opportunity to participate on an
14 equal basis.
15 I should also note that the California Public
16 Utilities Commission, discharging its responsibility on
17 the California Environmental Quality Act, is primarily,
18 if not exclusively, concerned with environmental effects
19 of the project in California. And indeed, the
20 guidelines under which the environmental impact
21 statements and reports are prepared in California state
22 that no consideration will be given to impacts occurring
23 in other states except to the extent that they affect
24 California.
25 So if you have concerns about environmental
26 impacts, these will be noted for the record, and BLM
27 will consider those in reaching its decision.
28 The California Public Utilities Commission,

1 except to the extent of course that they affect matters
2 in California, will respect the sovereignty of the State
3 of Nevada and will not be attempting to assess and
4 balance impacts that are occurring primarily in Nevada.
5 This hearing is being reported
6 stenographically by a court reporter, and the transcript
7 in this hearing will form an official part of the record
8 that the commissioners of the Public Utilities
9 Commission will consider when certifying the final
10 environmental impact report and statement that will be
11 prepared. And it will form the basis in part for the
12 final environmental impact report and statement, and
13 comments made here tonight will be addressed in that
14 final report.
15 Therefore, it's very important that the
16 transcript accurately record what you have to say here
17 tonight. And for that reason, I'll need your help.
18 First, I'll ask you to speak slowly. If you
19 are speeding, and we all tend to do that when we are a
20 little excited, I'll give you a hand signal to please
21 slow down. If necessary, I'll interrupt you, and I will
22 also interrupt you to spell words for the reporter that
23 she may not be familiar with.
24 Second, of course, I ask that you speak one at
25 a time. If you need to talk to someone to exchange
26 views on the project, if we're in formal session here,
27 please go outside and do that so that we can do as much
28 of this without the necessity of amplification as

1 possible.
2 Third, I'm going to ask you to attempt to
3 limit your initial remarks to three to five minutes. I
4 know that is a short time. After everyone who has
5 signed up to speak has spoken, we will circle back round
6 and give everyone a chance to add to their remarks. We
7 will stay as late as is reasonable.
8 And fourth, we will take regular breaks at
9 about ten minutes before the hour to give everyone a
10 chance to stretch a bit, and also if the reporter needs
11 to change paper.
12 Next, I want to remind you that you don't have
13 to speak here tonight to make your views known,
14 especially if you feel shy about speaking in public.
15 You also have the opportunity to submit written
16 comments. If you want to comment on the environmental
17 report or statement, you can do so by mail. Get it
18 postmarked before May 3rd, 1995.
19 Tom Murphy in the corner there can give you
20 the address -- Tom, raise your hand -- and those
21 comments will be considered equally with the oral
22 comments being made here tonight.
23 Now especially for those of you who are
24 concerned with California issues and the approval
25 process by the Public Utilities Commission, please be
26 aware that this public hearing is to gather information
27 about the environmental effects of the proposed
28 project. The most helpful contribution tonight is if

1 you have any facts or issues that the environmental
2 impact report and statement may have overlooked or may
3 have inadequately addressed.
4 If you have questions concerning the report
5 and the statements, data, analyses and conclusions, and
6 wish first to ask questions of the Aspen Environmental
7 Group representative here tonight, we will have a time
8 do to that, and we will go back on the record, and you
9 can make a statement as a result.
10 There will be another hearing on the proposed
11 project. Next month on May 22, 1995, beginning at 9:00
12 a.m., I will conduct evidentiary hearings on the
13 proposed project in Susanville at the City Hall Council
14 Chambers on North Lassen Street at No. 62.
15 These hearings will continue until May 26th,
16 1995, unless sooner complete.
17 The purpose of the hearings next month is to
18 take testimony on the project by the project proponent,
19 Sierra Pacific Power Company, and others concerning
20 whether the project is in the public interest.
21 At the beginning of those hearings, any member
22 of the public who wishes to may make a concise
23 statement. That will not be under oath, and it will not
24 be required to be filed in advance as written testimony,
25 nor will the statements made by the public at that time
26 be subject to cross-examination.
27 The California Public Utilities Commission may
28 consider those statements in reaching its decision, but

it will not rely upon them as a basis for making findings of fact or reaching conclusions of law.

At those hearings, any member of the public who wishes to may also participate as an interested party of equal status with the applicant and the other interested parties who have appeared at the prehearing conference. To do so, you would need to file on or before May 4th a written motion with the Commission stating the issues that you wish to address and describing the extent of your planned participation.

You may also attend the hearing and make a formal appearance. You may, but you are not required to, be represented by a lawyer.

If you appear as an interested party, you will have the privilege of introducing sworn testimony in writing on or prior to May 4, 1995. If you participate either by filing a motion to participate or by making an appearance, you will have the right to cross-examine witnesses and present sworn rebuttal testimony.

You may also make written argument concerning the applicable law through formal briefs.

Your participation, if you decide to become an interested party, will be governed by the Commission's Rules of Practice and Procedure. And the evidentiary hearings will be conducted in a formal, very courtlike type of proceeding.

Following the completion of the final environmental impact report and statement, the

Commission will determine if it meets the requirements as to form and substance of the California Environmental Quality Act.

The Commission will not decide upon Sierra Pacific's application until it has certified the final environmental impact report and statement.

As a result of the content of the final statement, the Commission may be required to reach specific findings concerning significant environmental impacts of the project prior to making any approval.

For California residents, the most obvious question about the proposed transmission line project has been why a project that is being proposed primarily to meet growing needs in the Reno-Sparks area is being routed primarily through California rather than Nevada. And indeed, the draft environmental impact report contains a discussion of alternatives that would focus on meeting those needs primarily through projects to be constructed through Nevada.

One of the questions to consider in completing the environmental impact report is whether that discussion of alternatives is adequate in light of environmental impacts to be expected with the proposed transmission line. Those impacts include several impacts upon residential and recreational land use, on transportation corridors, upon sensitive historical resources and other aspects of the environment.

In addition, the draft environmental report

reaches the conclusion that other impacts on the environment -- biological, air, hydrological resources -- will occur, but that such impacts can be mitigated or reduced to a level that is not significant.

Therefore, if you have any facts to show that such impacts either cannot be reduced or even after being mitigated would still be significant, now is the time to make your views on that known.

The purpose of posing these questions is to demonstrate some of the issues that should be considered to make certain the final report on environmental impacts will be as complete as possible so that the decision makers, the five commissioners of the California Public Utilities Commission, the appropriate managers at the Bureau of Land Management and the other affected federal agencies will be making decisions within their sphere of responsibility with as complete an understanding of the environmental consequences as possible.

If the final report continues to identify significant effects on the environment that cannot be substantially mitigated, the California Public Utilities Commission is required to find that there are specific overriding economic, legal, technological or other benefits of the project that outweigh the significant effects on the environment before it can approve the project.

I'm now going to be taking speakers from the

index cards that have been collected and numbered. If you haven't filled out one of those pink cards and you wish to speak, please see Tom at the door, and we will recognize you in turn.

If I mispronounce your name, I apologize in advance. If I misspell your name, please correct the spelling for the court reporter.

I'd like to ask that you come to the front of the room to speak. You may, if you wish, use the microphone. I'd prefer to be acoustic, because I think generally that allows everybody to participate more fully and encourages everyone to pay good attention.

The first speaker that has asked to be recognized is Carole Bohn, B-o-h-n.

Are you here, Ms. Bohn?

STATEMENT OF MS. BOHN

MS. BOHN: My name is Carole Bohn. I reside at 8390 Chippewa in Reno, Nevada. I'm also one of the trustees for the Horizon Hills General Improvement District.

ALJ CAREAGA: We will be off record for a moment.

(Off the record)

MS. BOHN: My name is Carole Bohn. I reside at 8390 Chippewa in Reno. I am one of the trustees for Horizon Hills General Improvement District.

It was just brought to our attention a very short time ago that this project was in the mill. It is our feeling as not only a resident of Horizon Hills, but

TR. 1-1

as one of the board members, that this project is going to be inconsistent with land uses of the residential development. TR. 1-1

It's going to be total degradation of the environment. Our property values will be dramatically impacted. The visual impact will be felt, and the fact that I personally feel as a resident, not a board member, that we should have been notified as to this project.

We all bought out there because of the beauty and the serenity. Our children ride their bikes. We walk that area. We are all also in the process of putting in a brand new water tank, and we are very concerned about the possible health impact that that line will bring, besides the fact that it's totally ugly and hellacious. TR. 1-2

It is my feeling that if Sierra Pacific thinks this is a necessary thing to do, let them put it in their backyard. Don't put it in mine.

ALJ CAREAGA: Thank you.

We will be off record a moment.

(Off the record)

ALJ CAREAGA: We will be on record.

While we were off record, I asked the cooperation of the audience to minimize applause and instead to indicate approval of speaker remarks by raising of hands. And we adjusted the microphone.

The next speaker who asked to be recognized is

Mr. Peter Holzmeister, H-o-l-z-m-e-i-s-t-e-r, representing Truckee Donner Public Utility District.

Good evening, sir.

STATEMENT OF MR. HOLZMEISTER

MR. HOLZMEISTER: Good evening, ladies and gentleman. My name is Peter Holzmeister. I'm general manager of Truckee Donner Public Utility District.

Truckee Donner is a small, consumer-owned electric and water company in Truckee, California. We have been in business since about 1927 serving over, right now, about 9000 meters in the Truckee area.

We, since our inception in '27, have been an all-requirements electric customer of Sierra Pacific. And we are also members of the Northern California Power Agency.

We joined NCPA in 1989 for the purpose of being able to purchase electric capacity and energy on the open market from parties who produce electricity other than Sierra Pacific. TR. 2-1

Over the last several years, Truckee Donner has had a very long-term, and at times very contentious, relationship with Sierra Pacific over the issue of transmission access.

Sierra Pacific has represented to us that there is a reservation of 30 megawatts of capacity on the Alturas line and that once Alturas is constructed, Truckee Donner would be offered network transmission service by Sierra Pacific.

412

As you probably all know, Sierra Pacific and Washington Water Power are in the process of attempting to merge their companies into a new company. And part of the testimony that was submitted at FERC in relation to this merger was submitted by a gentleman by the name of Ralph Caldwell, who is a staff attorney employed at Sierra Pacific.

And I'd like to just real briefly read a question and a portion of an answer in his prepared testimony. The question -- and again, this was something that was submitted at the Federal Energy Regulatory Commission.

The question is how will completion of the Alturas Project affect transmission service provided by the company.

Well, a portion of his answer to that question is, and I'll quote, Truckee Donner PUD has requested 30 megawatts of import capacity to serve load which currently is included as part of Sierra Pacific's native load requirement. Those requests have also been included in the planning for the Alturas Project.

Sierra Pacific has also filed an open access transmission tariff at FERC.

Truckee Donner PUD intends to be an intervenor in this FERC matter. We are going to ask that FERC require Sierra Pacific to adopt an open access transmission rate that conforms with the principles contained in FERC's proposed NOPR record, the notice of

TR. 2-1

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

413

proposed rule.

If we succeed in having a transmission rate adopted at FERC that conforms with the FERC principles, and if Truckee gets access to the transmission service because of the construction of the Alturas line, we believe that the Truckee community, the residents of Truckee will benefit greatly by the construction of the Alturas line.

As the California Public Utilities Commission knows, open access to firm transmission is a goal we all have. We've all recognized that as the path to real competition within the electric utility industry. We believe that the construction of the Alturas line furthers that.

Truckee Donner PUD supports construction of the Alturas line. We would like to see it energized by early 1997.

We do not have comments tonight regarding issues relating to environmental concerns, nor proposed mitigations. Our comments are in relation to the benefit that the Alturas line could have to some California customers in helping us secure low-cost power supplies. Thank you very much.

ALJ CAREAGA: Thank you, Mr. Holzmeister.

The next speaker is the Honorable Bruce Breslow, Mayor of the City of Sparks. B-r-e-s-l-o-w.

Mr. Breslow

STATEMENT OF MR. BRESLOW

TR. 2-1

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

MR. BRESLOW: I'm at the tall microphone, I guess.

I'm here to represent the City of Sparks in our official position, and that is that we support the environmentally superior route as recommended.

I'm not going to say environmentally sound, because nobody wants that darn thing anywhere near them, and it will disrupt people's lives no matter where it goes.

But if it went to the alternative through the City of Sparks corridor, the conservative estimate is that in the Satellite Hills and the Vintage Hills subdivisions, conservatively we would have to destroy 64 homes and average between 11 and 13 million dollars in extra costs.

That doesn't include the impacts on Spanish Springs, which is an award-winning, master-planned community. The construction of the first of two golf courses right next to this power line and very upscale community takes place July 1st.

Spanish Springs will have 30,000 people in the next 25 years in the Sparks corridor. The county population around that is another 30,000 people.

And in the alternative site it will have -- it will impact that entire planned community, but immediately through existing homes we would have to, I guess, have you all buy 64 homes and at an average of a hundred and fifty to a hundred and sixty thousand dollars. That doesn't include any of the homes that are

TR. 3-1

currently under construction.

This additional $10 million cost is not something to look lightly at, because usually the power company finds a way to pass that on to the users.

And it's my understanding from looking at the documents that if the alternative route through Sparks is chosen, it will be another at least $20 million in construction costs. So that's an additional $30 million that I'm sure that would find its way into your bills.

As a representative of city government, I would like to say that the City of Sparks supports the environmental -- recommended environmentally superior route and have great sympathy for everybody, because no matter where you live, if this thing is next to you, you are not going to want to live there anymore.

And thank you for letting me speak. I have to go to a Planning Commission meeting.

TR. 3-1

ALJ CAREAGA: Thank you, Mayor.

The next speaker who has asked to be recognized is Mr. Marc Nicolet? N-i-c- --

MR. NICOLET: Nicolet.

ALJ CAREAGA: Thank you.

Thank you, ladies and gentlemen.

STATEMENT OF MR. NICOLET

MR. NICOLET: It's Marc Nicolet. A slight change there.

I'm the financial officer for Wade Development Company. We are here on behalf of myself and my company

to support this project. We are supporting it because we believe that the growth that is affecting the State of Nevada has to be managed properly.

While I cannot talk about the environmental impact or the other technical matters, I can say that reliable, reasonably priced energy is important to this growth. This growth will help the State of Nevada prosper. It'll bring jobs, increase the tax base, all of those kinds of benefits to the state. And that's all I have. Thank you. (TR. 4-1)

ALJ CAREAGA: Thank you, Mr. Nicolet.

The next speaker is Alta, A-l-t-a -- is it Thomson, T-h-o-m-s-o-n?

MS. THOMASON: Thomason.

ALJ CAREAGA: Would you please spell that when you come to the microphone.

MS. THOMASON: T-h-o-m-a-s-o-n.

ALJ CAREAGA: Thank you.

STATEMENT OF MS. THOMASON

MS. THOMASON: I'm from Horizon Hills. I bought the property up there for serenity, so I can look at the beautiful mountains, so that I would have the clarity of mind where I could work in peace. With the power line going up there, it would make our dogs, our animals completely disrupted with the high voltage and this screeching that it does in the night and in the day. It would completely tear up our animals' behavior. We are asking, please, do not put it in our backyard. (TR. 5-1)

Also take a note that we have a fault up there, and I believe that would disrupt our living quarters also. I empathize with everybody, but I, too, do not want it in my backyard. (TR. 5-2)

We also would be blocked, I believe, from our lakes and from all the recreation that we enjoy up there, and our children and everything. And, you know, when you buy ocean-front property, you want the ocean to be there. The same as when you buy hill property for the view, you want that view to maintain the same. (TR. 5-3)

ALJ CAREAGA: Thank you, ma'am.

Thank you ladies and gentlemen.

Ruth H. Hart, H-a-r-t. Are you hear, Ms. Hart?

STATEMENT OF MS. HART

MS. HART: I'm Ruth Hart, H-a-r-t. I also am from Horizon Hills General Improvement District. I'm on the Board of Directors.

I guess I wish I was living in an award-winning subdivision. We feel our view and our serenity is award winning.

And I have 95 residents' and property owners' names from the district that are either working a shift or babysitting so the other partner can work. But we -- I have been in Horizon Hills for 31 years, happily. I do love my neighbors and the serenity, and we are putting up a 350,000 gallon water tank. I'm not nervous.

418

The power lines, which will be 120 to 130 feet high, will be within 2,000 feet of the new tank and run right behind our homes of a subdivision of 142 homes.

We feel it is totally chaotic for the aesthetic use. And for the one view, we look at Peavine Mountain, and to see 130-foot towers with six 1-inch lines 1200 feet apart is going to be totally devastating to all of us. (TR. 6-1)

It's my understanding that when they chose alternate routes or they looked at routes, they used maps that were from 1983 that didn't show a lot of current homes that are there now. So I speak on behalf of the 95 names I have and the residents that have expressed total opposition to this project. (TR. 6-2)

ALJ CAREAGA: Thank you, Ms. Hart.

Would you like to leave copies of those with us?

MS. HART: Here they are.

ALJ CAREAGA: Thank you, ladies and gentlemen.

Next I'd like to recognize Mary Joe Kivi, K-i-v-i.

STATEMENT OF MS. KIVI

MS. KIVI: Mary Jo Kivi, K-i-v-i, 2430 Sauk Court. And you're getting bombarded with a lot of people.

When we bought our home about ten years ago, there were only 130 houses up there, so we haven't grown a whole lot. But we do look at the mountain. As Ruth said, we love to be able to look up there. (TR. 7-1)

419

Our kids take rides on their horses, and that's one of the reasons we bought up there, was because it would all be BLM land behind us. We didn't have to worry about the kids getting injured by running -- the horse running into a big power pole or something.

Like our kids are not big kids. My ten year old is with us today. Though she doesn't ride a horse up there, we are near -- we want our serenity. We don't want the ugliness, but my most -- the biggest concern I have is for my health. (TR. 7-1)

I am -- I have got a lot of chances for cancer because of family history, and I don't want a power line that could possibly give me more cancer chances. Thank you.

ALJ CAREAGA: Thank you, Ms Kivi.

Thank you, ladies and gentlemen.

Mr. Charles Parrotto, P-a-r-r-o-t-t-o.

MR. PARROTTO: Parrotto.

ALJ CAREAGA: Parrotto, I'm sorry.

STATEMENT OF MR. PARROTTO

MR. PARROTTO: How you doing tonight?

First of all, I don't know you. You don't know me. We're all neighbors. And I think it was pretty goddamned rude that the Mayor of Sparks got out of here, along with the other speaker, telling us that he doesn't want it in his backyard to ruin his affluent neighborhood and his golf courses, but that I can have

it in mine.

I'd also like to know why I wasn't notified of this, because I just heard of this last month through neighbors. (TR. 8-1)

Is there any process for notification of people on the line where this is going to be a thousand feet from their home?

Was there any impact study done about the devaluation of the property and the view that I have and which I bought the property for to begin with? (TR. 8-2)

Thank you.

ALJ CAREAGA: Thank you, Mr. Parrotto.

Thank you, ladies and gentlemen.

Next I'd like to recognize -- is it Nydia, N-y-d-i-a, Orozco?

STATEMENT OF MS. OROZCO

MS. OROZCO: My name is Nydia Orozco. I have been a resident in Lemmon Valley since 1992, and I understand from looking at some of these project maps that this line, transmission project, has been in process since 1994.

I was not notified, and I think that if Sierra Pacific Power Company can send me a notice in my mail warning me to not sleep with my electric blanket on, to stand away from my microwave oven -- (TR. 9-1)

ALJ CAREAGA: We will be off record.

(Off the record)

ALJ CAREAGA: We will be on record.

Excuse me.

MS. OROZCO: So my question was if Sierra Pacific Power Company can send me a notice and warn me to stand away from electric appliances and not have my blanket on at night, how come they could not notify me as a resident of the North Valleys of this proceeding?

And since tonight was the first time I heard that Truckee, California, wants to have power routed to them if this transmission goes through, this transmission line goes through, it's supposed to terminate at the base of Peavine, where are these distribution lines going to come from? (TR. 9-2)

And what is the route that these distribution lines are going to take to reach Truckee?

And were those residents that would be involved in this corridor notified and allowed to make comment on the impact that line, distribution line, would have on their communities? (TR. 9-3)

And, you know, and if Sierra Pacific can tell me to stand three feet away from my microwave and not sleep with my electric blanket on, how can they tell me that a 345,000 kilovolt line is not going to impact a resident, any kind of a line which is electrical, from 265 feet away, which is where they would be? The nearest resident will be 265 feet. Thank you. (TR. 9-4)

ALJ CAREAGA: Thank you.

Ladies and gentlemen, thank you very much. I appreciate it.

Next I'd like to recognize Mr. Robert -- is it Pyzel, P-y-z-e-l?

MR. PYZEL: That was very good. My planning commissioners and city council generally don't get it the first time.

STATEMENT OF MR. PYZEL

MR. PYZEL: Once again, I'm Robert Pyzel, representing the City of Sparks Planning Department.

We would like again to register our opposition to the Nevada alternate route. We received comment in the 1994 draft that went around by then-director Greg Evangelatos. We are reaffirming that again.

The Nevada alternate route proposes to use the existing corridors, including the built portions of the City of Sparks.

Per your document, these corridors would need to be widened to accommodate the 345 kv line. A conservative estimate of existing houses that would be within the widened project is 64 homes within the Satellite Hills subdivision and the newly constructed Vintage Hills subdivision.

That number of homes does not address homes that would be within the expanded area or any homes within the Spanish Springs area, the properties to the north, including Mr. Iratcabal, I-r-a-t-c-a-b-a-l, and Cappurro, C-a-p-p-u-r-r-o, which would be along the easements.

The new line is intended to provide continuous

TR. 10-1

service to our region. If an incident occurs to the existing line currently running along the City of Sparks, the document points out that the potential for disruption of service in both lines would increase. That concludes my report.

TR. 10-1

We have also submitted written comments. Thank you.

ALJ CAREAGA: Thank you, Mr. Pyzel.

I'd next like to recognize Lori Burke, B-u-r-k-e.

Ms. Burke.

MS. BURKE: Could I sit, please?

ALJ CAREAGA: Certainly.

We will be off record.

(Off the record)

ALJ CAREAGA: We will be on record.

STATEMENT OF MS. BURKE

MS. BURKE: I'm not sure exactly where this should come in, but it is a comment that I wish to make regarding the lack of notice and the lack of public information that was provided regarding routing, particularly in this area, since apparently both other counties or three other counties have had somewhat more notice.

As you know, I have felt all along that there is little public awareness of the proposed project in the Reno area. The primary reason is that our one area newspaper has provided very little reporting on the

TR. 11-1

project per se. It has editorially endorsed the position of Sierra Pacific without presenting any information that might lead to citizens' identifying for themselves any specific concerns or negative impacts from the project or the routing. This in turn affects the adequacy of the CPUC notification, which was limited to persons owning property within 1000 feet of the proposed right-of-way.

The Reno Gazette Journal has had one news story early in March on the project relating to an issue that I had raised about possible danger to balloonists who use the Rancho San Rafael Park for the annual Great Reno Balloon Race. This story described the general direction of the line and mentioned that there was some opposition to the routing in Sierra County and through the Park area.

Since that time, the only mention in the news was an editorial, and I enclosed a copy of the editorial which was very much -- was submitted and was a great endorsement of the project without any additional detail.

On March 21, I met with Reno Gazette Journal reporter Tim Anderson and with Bill Whitney, a planner with the Washoe County Planning Department. At this meeting, Mr. Whitney and I went over the proposed route in Washoe County and Reno with Mr. Anderson and located by name some neighborhoods, streets and local landmarks that would help people identify where this line would be

TR II-1

going in relation to their dwellings and property.

Mr. Whitney also provided some up-to-date parcel and zoning maps for the impacted areas.

Mr. Anderson indicated these would be suitable for publication along with the information advising citizens where they could go to review the draft document.

ALJ CAREAGA: Excuse me, Ms. Burke, can you speak a little more slowly?

MS. BURKE: Okay.

ALJ CAREAGA: Thank you.

MS. BURKE: Okay. Our discussion with Mr. Anderson covered some of the issues in the draft EIR/S that I felt should be addressed that may be of concern to Washoe County and Reno residents in the vicinity of the line.

This was an attempt on the part of Mr. Whitney and me to get the information out in the public forum so people could participate in the review process.

I should also mention that Commissioner Joanne Bond had encouraged us to do that at an earlier meeting.

On April 5th, I contacted Mr. Anderson at his office to inquire as to why nothing had appeared yet in the newspaper.

Mr. Anderson told me that his editor had decided to hold off on printing the article with the information until a couple of days before the hearing on

TR II-1

the 20th. The reasoning behind this editorial decision was that people might be more likely to react if they had only a short time to react in.

I spelled out that it took some time to get up to speed on a project of this complexity, and the hearing he was referring to, being this hearing, was designed to take formal comment on a document that contained over a thousand pages.

I also took issue with his obvious assumption that only one article, one story, would be sufficient to explore issues that might be raised prior to the hearing.

After some discussion, Mr. Anderson said he would try to get some information in print the upcoming week.

I realize that the CPUC sent out notices of the project proposal and of the draft availability to owners of nearby property, but property owners are not the only ones to be affected. The residents of the North Hills Apartment complex are closer to this power line than any other group, and the minimum distancing from the power line applied elsewhere is not proposed adjacent to this complex. However, the owner, who lives in Southern California, has done nothing to inform his tenants of this proposal. The same is true for the residents of Skyview Mobile Home Park.

"Nearby" also means different things to different people. I have been contacted by several

TR. 11-1

members of -- neighborhood advisory council members who have just heard about this project by word of mouth. Members of the North Valleys Advisory Council and the Board of Horizon Hills both indicated that they were unaware of the project, and certainly did have neighborhood concerns about it.

The same is true for the Anderson Acres Home Owners Association and people who live on Sierra View Road. When project routing and design was initiated three years ago, some of these groups might have been notified about the project. However, board membership has changed since the initial contact, as have portions of the resident populations. Changes have been made in the project proposal as well, both in routing and detail, meaning the impacts have changed as well. These boards need time to review the data -- the updated project.

Last paragraph. Utility companies' proposals for these types of projects generate more public input than has been the case with this application.

I should say that this is about the third meeting I have attended, and generally speaking, Washoe County has fewer people. This is a good showing tonight than any of the other areas, and yet we have some of the most substantial impacts.

I don't think Washoe County and Reno residents will be any less concerned than citizens elsewhere about how a project of this type and magnitude might affect

TR. 11-1

them, providing that they have adequate notification and route desription of that project and the time to address it.

Considering the silence of the local paper and the limitations of the CPUC notification process, this letter is to point out and comment on what we feel are significant and critical limitations affecting the validity of the public review component of this project.

I feel that the explanation here, combined with what the CPUC will hear from the people who, as I, respond tonight, will provide a basis for extending the period of public review and for assuring that adequate public education on the project is effected prior to the end of that extended period. Thank you.

TR. 11-1

ALJ CAREAGA: Thank you, Ms. Burke.

I'd like to recognize someone whose name -- thank you, ladies and gentlemen -- whose name I can't make out, but whose address is Post Office Box 2041.

Would you identify yourself, please?

MS. PIRKLE: My name is Rusty Pirkle. My handwriting is atrocious, which is why I gave up handwriting analysis. And this room is atrocious. It's a lousy speaking room.

ALJ CAREAGA: I apologize.

Would you state your name for the record.

MS. PIRKLE: My name is Viola Pirkle.

ALJ CAREAGA: Is that Pirkle, P-i-r-k-l-e?

MR. PIRKLE: Yes. My first name is Viola. My nickname is Rusty.

ALJ CAREAGA: Thank you. And if I could also encourage you and future speakers to be slower in your remarks so the reporter can keep up with you.

Please go ahead

STATEMENT OF MS. PIRKLE

MS. PIRKLE: I didn't come here to speak tonight. I came here to learn, but as I have seen, it's a speaking session. As this project stands, I'm presently opposed to it in its present capacity.

I live in Honey Lake Valley. That's in northern Washoe County. I'm a Nevada resident. I work in Reno. I drive one hour to an hour and a half each way to get to my job, each way to go home. I drive through Long Valley, which will be affected by this project. My valley will be affected by this project, Honey Lake Valley.

From what I have seen in the maps, I won't be right next door to those towers, but they will be so close to me as to disturb every lovely thing I have experienced since I moved out there. I have been there for five years. I don't have any poles. I don't have 7-Elevens. I don't have boomboxes. I don't have anything out there, but if I showed you pictures of my home, which is a house, it's not a teepee, it's a lovely, wonderful home in the middle of nothing. I look to the east through my windows, the west, the north, the

TR. 12-1

south, I see nothing. I see nothing but mountains and loveliness and one of the most beautiful valleys anyone ever see if they loved northern Nevada, as I gather some of us do.

Well, now I'm going to look over to where, excuse me, I -- every now and then I see Herlong, I see the army base. Well, now I'm going to see not only the army base, I'm now going to see those great power poles -- I don't know what I'm going to see. Maybe I'm prejudiced. I don't know what I'm doing here. Maybe I'm fearful, but you hear this "zing, zinging, zing," these noises that these power lines are going to make, and before all I ever heard were the hawks, the eagles, the coyotes, the wind. I'm now going to hear this all day, all night. I don't know, I'm fearful of whatever this is going to do to the tranquility, the beauty, the loveliness that I moved out there to have part of my life.

I drive an hour to an hour and a half to get to work, an hour to an hour and a half to get home. I spend two to three hours a day five days a week on the road to get to my home, to get to my job. And when I get to my home, there is nothing but communing with God and nature. I don't know what it's going to do. We'll find out.

I oppose it on aesthetic and spiritual principles. I oppose it through Long Valley on aesthetic and spiritual principles. If those are

TR. 12-1

environmental, well, include that as well.

I don't know, again, because it hasn't been presented. As I said, I came here tonight to see what could be learned. I haven't gone through the present statement that's presented. I have merely looked through it.

What benefit will that give to the users along the way? Does this mean that in five years I'm going to have power because your power pole's out there? Does that mean in five years my property value will be increased?

Right now I have no power. I have a generator which gives me electricity. I have solar panels which give me electricity. I have my own well. I'm fully self-sufficient. Will I want this in years to come?

Why would I rather have electricity coming from these monstrous, ugly, soundwracked power lines?

I don't know. I'll consider it further, but as of now, I'm opposed.

Have I got more time?

ALJ CAREAGA: If I could, I'd like to take a five-minute recess and then we can come back. We can have other speakers, and we will be glad to recognize you when other speakers have had a chance to talk.

MS. PIRKLE: Thank you.

ALJ CAREAGA: Thank you, ladies and gentlemen.

We will be off record and in recess now for about five minutes. So come back in about that time, we

TR. 12-1

will get started again.

(Recess taken)

ALJ CAREAGA: We will be on the record.

Ladies and gentlemen, I'm going to take the next speaker out of order because she has a conflicting commitment and will not be able to stay to be taken in turn, so I'd like to next recognize Ms. Christine Gilbert, G-i-l-b-e-r-t.

Would you please come to the microphone, and I'll say it again: Please try to speak slowly and into the mike.

STATEMENT OF MS. GILBERT

MS. GILBERT: I'm also from Horizon Hills, and I'd like to say that I am opposed to them putting in the power line and that I do find it hard to believe that we weren't given better notice.

I lived in Las Vegas at one time. We have property there, and I don't know if these are the same power lines, true, but they are also going through with a type of structure in Las Vegas. And we have received three notices within, like, the last year to give -- with dates and also meetings that were going to be taking place with concerns from the residents that will be close to the power lines in Las Vegas that is going to be going in. TR. 13-1

So I guess I live in Reno, and they managed to find me and be able to inform me of these changes happening. I do find it hard to believe that Reno can't

be quite as aware and well informed also. TR. 13-1

And we were going to buy out in Spanish Springs before we bought out in Horizon Hills, and we also were going to buy for the view in Spanish Springs, and until we found out they were going to put a two-story house across the street. Then we decided to cancel our plans in Spanish Springs and look for a nicer area with a nicer view.

So, once again, it looks like we might have to. Hopefully not, because I am -- you know, this is the nineties, the big health conscious -- everyone is supposed to be health-aware in the nineties, and to put these type of electrical poles in, I think, is very unhealth-conscious.

And I am very happy where I'm at right now. And hopefully everybody sticks together, we will be able to, you know, get our way and get what we want since we are the ones that pay the bills. Thank you.

ALJ CAREAGA: Thank you, Ms. Gilbert.

Thank you, ladies and gentlemen.

The next speaker to be recognized is Cari, C-a-r-i, Lockett, L-o-c-k-e-t-t.

Ms. Lockett.

MS. LOCKETT: My name is Cari Lockett. I'm also with Horizon Hills. I'm a resident and a member of the Board of Trustees. I'm concerned on several counts.

Number one, I'm really disturbed at the lack of notification. That's been reiterated several times. TR. 13-2

I don't need to go into that further, but it does amaze me that we only heard about this through happenstance basically in the last two months, basically the last meeting that you all held. And it seems really unreasonable that something like this should come this far down the pike that we finally got notification merely, just like I say, by happenstance. TR. 13-2

There has not been enough in the newspaper or enough individual notification of local boards or residents in the North Valleys.

Secondly, my biggest concern is the aesthetic impact that it's going to have on the Peavine hills, on the east flank of Peavine. It seems to me that there has got to be an alternative way to go, whether you put it down the middle of 395 or some other existing corridor. You know, why impact a pristine area even further? It's seems unnecessary. TR. 13-3

And I'm also concerned about the health impacts, the fact that the transmission line will go approximately 1,000 feet from our new water tank or supply source and just the fact that it's going to be out in an area that I really love. And I don't want to look out at those hills and see those transmission lines. Thank you. TR. 13-4

ALJ CAREAGA: Thank you, Ms. Lockett.

Next -- thank you, ladies and gentlemen. Next I'd like to recognize Mr. Steve Alastuey, A-l-a-s-t-u-e-y.

MR. ALASTUEY: Excuse me a second.

ALJ CAREAGA: We will be off record for a moment.

(Off the record)

ALJ CAREAGA: On the record.

MR. ALASTUEY: I'm a Citizen Alert board member. Citizen Alert is a nonprofit organization dedicated to environmental studies.

I live at 1077 Riverside Drive --

ALJ CAREAGA: Excuse me, sir, can you speak into the microphone so the audience can hear.

Thank you.

MR. ALASTUEY: My name is Steve Alastuey. I'm a Citizen Alert board member. I live at 1077 Riverside Drive, and I just have a question.

Have you done the Native American consultation?

I understand there are 25 or 30 tribes who should be consulted along the proposed power line corridor. The consultation process involves taking tribal members along the corridor. For example, there are members of Indian tribes that are fairly obscure in some of those studies. However, since they do exist and they are out there, they should be considered during the process. TR. 13-5

ALJ CAREAGA: Thank you, Mr. Alastuey.

Ladies and gentlemen, thank you.

I'd like to next recognize Miss -- is it initial M. Lee, L-e-e, Dazey, D-a-z-e-y, also of Citizen

Alert?

STATEMENT OF MS. DAZEY

MS. DAZEY: Right. Good evening.

ALJ CAREAGA: Would you speak into the microphone, please.

MS. DAZEY: Sure. Which one? This one is more my height.

I'd just like to make a few preliminary comments for Citizen Alert. My name is Mary Lee Dazey, and I'm the Northern Nevada Director of Citizen Alert.

While there is definitely a need for additional energy sources, Citizen Alert questions whether the proposed project is the solution. To offset baseload projections, we feel greater attention should and could be given by Sierra Pacific to demand-side programs, such as weatherization, efficient lighting, low-emissivity windows and appliance efficiency. TR. 14-1

Only after demand-side measures are taken, would we as ratepayers be willing to have our dollars go to any new projects that have potentially serious environmental, health, cultural, aesthetic and land use impacts.

According to Sierra Pacific, the slated need for the transmission project is a forecasted growth increase for Washoe County; but it is equally true that much of the need for the project comes from the mining industry in central and eastern Nevada with projected baseload increases of 14 percent. TR. 14-2

While many ratepayers are concerned about future burgeoning growth in Washoe County, we are being forced to pay for the infrastructure to support growth.

Washoe County is out of compliance with federal air standards. The effects of the recently approved Pinion Pine coal burning project at Tracy have yet to be determined. The cumulative effects upon the air from all of Sierra Pacific's projects must be evaluated to truly weigh whether the air quality can support them. Citizens need to understand the cumulative effects on air quality of the construction of both the Tuscarora Pipeline and the Alturas Transmission Project simultaneously and which share the same corridor. TR. 14-3

I think I missed a word there. Cumulative effects on air quality of the construction of both the Tuscarora Pipeline and Alturas Transmission Project simultaneously and which share the same corridor.

Serious attention needs to be given to possible consequences of having a transmission line in the same corridor as a gas pipeline in terms of contamination. More information needs to be given so that citizens are made aware of how transmission lines can cause corrosion on the gas pipeline and cause leakages. TR. 14-4

Do you want me to go slower?

ALJ CAREAGA: Yes, please.

MS. DAZEY: I wondered if it was slower or softer

or you're doing Tai Chi or --

Okay. Another major area of concern is the effects of electromagnetic fields associated with major transmission lines upon the health and well-being of families living near transmission lines and substations that perhaps warrants the need for a more expensive alternative of burying the lines.

And I think someone else earlier made a good plea for people outside of residents that may also experience effects of EMF. TR. 14-5

In eight of the 14 studies done on EMF, four found increases of childhood cancers such as leukemia in children living 131 feet from transmission lines. In Sierra Pacific's own literature, a handy little packet which I also brought -- I knew I was going to need this for something -- it says that -- "Understanding EMF," it recommends to customers to limit their exposure to EMF.

Your Honor, how are property owners and wildlife going to limit exposure when the lines go through the land near their homes?

The 130 foot towers would be unwelcome to ridgetops as part of Washoe County's Open Space Plan, and would seriously impact Rancho San Rafael's viability as a park. The lines would affect the park's ability to get the additional 181 acres from the Forest Service required to continue with the Evans Creek Project, an important project to protect the park from floods. TR. 14-6

Homes sharing the park's boundary and the

transmission lines will be continually bathed in EMFs, electromagnetic fields. TR. 14-6

As I said earlier, Citizen Alert supports demand-side projects and renewables to meet increasing baseload increase and as such supports a no-action alternative at this time.

These are our comments. Thank you very much.

ALJ CAREAGA: Thank you, Ms. Dazey.

Ladies and gentlemen, thank you again for your cooperation. I appreciate your showing support for speakers in this way that does not disrupt things.

The next speaker who has asked to be recognized is Gary A. Smyres, S-m-y-r-e-s.

I apologize if I mispronounced your name.

STATEMENT OF MR. SMYRES

MR. SMYRES: You can call me anything. The name is Smyres, S-m-y-r-e-s. I live in Sparks, but I'm building a home off of Hoge Road, and I have one suggestion. This has to do with the transmission line where it goes from the west of San Rafael Park, which is now BLM land but will probably be San Rafael Park on into the substation.

As I read your map, this is the only 345 kv line coming into town, so you are going to have to drop the voltage down at the substation or somewhere. So what I'd like to recommend is since there is a little valley on the west side of the BLM land there that you put in your substation, drop your voltage down there, TR. 15-1

bury the line on into the present station and tie in with the same voltage.

Also in the last two years I have been on the hill working on my house, and I have noticed that two of the days during the balloon races the balloons have landed right in the area of the proposed transmission line. So I would view this as a potential hazard for the balloon races. (TR. 15-2)

ALJ CAREAGA: Thank you, sir.

Thank you, ladies and gentlemen.

Next to be recognized is Mr. Billy, initial J., Wingfield, W-i-n-g-f-i-e-l-d.

Mr. Wingfield.

STATEMENT OF MR. WINGFIELD

MR. WINGFIELD: I'm Bill Wingfield. I live in the western part of town. And I'm opposed to the line for health reasons.

We just came from a community about six months ago in around Houston, Texas. HL&P decided that they were going to run a power line between an elementary school, a high school and a middle school. We told them not to do it. They decided that they were going to anyway. (TR. 16-1)

It was a case of eminent domain fighting eminent domain -- the school district having eminent domain, HL&P having eminent domain.

People all over the world were interested in the case. The case -- the Klein Independent School

District --

ALJ CAREAGA: Would you spell that, please.

MR. WINGFIELD: K-l-e-i-n Independent School District was represented by a firm in Houston by the name of Vincent and Elkins. The case went to court. We won the case, not on the eminent domain issue, but on the electromagnetic generation that came out of that power line.

We took a fluorescent bulb, stood under the line -- it was a 345 kv line also -- and the bulb comes on. The data that the case was won on came from Russia.

Russia has done a lot of research in the electromagnetic area, and that information presented by the district law firm was sufficient to win the case. (TR. 16-1)

They also awarded us $25 million. And by the way, HL&P built the power line through just as they had planned to do anyway no matter what our objection was. Since they gave us $25 million, they appealed the case to the Fifth District Circuit Court in New Orleans.

The Circuit Court also agreed and awarded in favor of Klein School District. However, they chopped off the 25 million that HL&P was going to have to pay.

The end result was that HL&P built their power line around and away from the schools and brought it back in.

But the case has proven that electromagnetic problems from these lines do affect the schools. They

do affect children who are near them and people who live near them.

And so I think that any time a line like this is built, you should make sure that there are going to be no people nearby. (TR. 16-1)

And another reason, since L.A. and a lot of other cities run their power lines in the city under ground as they get in near town here, why can't they go underground with this thing rather than keeping it up above ground? I realize it's going to be more expensive, but we're talking about a lot of power coming in. 345 kva is a lot of juice, and it's going to have a lot of effect on people. Thank you. (TR. 16-2)

ALJ CAREAGA: Thank you, Mr. Wingfield.

Ladies and gentlemen, again, thank you very much.

Next I'd like to recognize Pam Muckenthaler, M-u-c-k-e-n-t-h-a-l-e-r. And again, I apologize for mispronouncing your name.

Ms. Muckenthaler.

STATEMENT OF MS. MUCKENTHALER

MS. MUCKENTHALER: You did a good job.

Again, I'm Pam Muckenthaler, and I live at 8030 Mohawk Lane. And for most of you guys that live out there where I live -- one street that comes up on the subdivision. And for one thing, when this thing goes through -- and it's my understanding it's a done deal. So maybe we are all wasting our time tonight, but

I will say that I'm disgusted that this whole thing is going to even come up.

And, you know, I have horses and I have cats and dogs, and that's the one reason that I bought out there, so I could have those things, because there are other areas in Reno or Sparks where I can't have what I have. And when we moved out there in '91, about a month later there was a fire that swept through the hills. And most of us keep our places nice, and over the last few years that has started to grow up and even when it didn't grow, when the sage was all burned down, it was still beautiful.

And I'm from Michigan originally, and when I moved out to Nevada, it was for the main reason of having the beautiful mountains to look at, the peaceful areas to go around. And whether you are on a horse or you're walking or you are in your four-wheel-drive vehicle, it's sickening to think of what this thing is go to do to our area.

And I just feel that they should have given us a lot more notification about this. I think they should have let us speak up sooner and take a vote on whether or not we want this thing or not. (TR. 17-1)

It's bad enough when you do go out on the hill and you come upon some junk that, you know, somebody that was inconsiderate and left it there, but this is not only going to look crummy, it's going to affect our health. (TR. 17-2)

I don't want to get cancer. I don't want to be exposed to this unsightly, monster-looking thing, and I think they should put it underground if they are going to do it. And if they are going to go through with it, then move it way the hell out in the damn boondocks where nobody can see it. And I don't care how much money it costs. (TR. 17-2)

It seems to me like money is a big object instead of people's health and lives.

And like I'd like to say one more thing. It disgusts me that we can't applaud. If you are not looking around real quick, you can't tell who is opposed and who is not.

And I'd like to thank you for letting me speak. And again, I'm real sick of this thing going up in our neighborhood.

ALJ CAREAGA: Thank you.

Thank you, ladies and gentlemen.

If you'd like to leave your hand up longer so each of you can be seen and see, please do so.

Mr. George Herman, H-e-r-m-a-n, is the next speaker who has asked to be recognized.

Mr. Herman.

STATEMENT OF MR. HERMAN

MR. HERMAN: Thank you. Does this thing work here?

I too live in Horizon Hills, and we bought there right at the edge below Peavine. There's no structure except that wooden water tank between us and

the top of Peavine. We bought it for location. We bought it because it's beautiful there.

I too would like to add my voice to those who are wondering why we didn't get proper notification. (TR. 18-1)

The issue of impact which has been raised relates to alternative routes. That is to say the obvious, that wherever the line goes, it affects somebody. So the issue is comparative.

And my question then is what are the reasons why it is not proposed that the transmission line follow the existing line that runs from Gerlach through Wadsworth and Fernley. I don't think it runs right through the town there, but I don't know that. (TR. 18-2)

And why must it be run down Long Valley?

It's going to cross Long Valley Creek. It's going to affect the wetlands situation there.

Why is it necessary that the line follow a different route than the existing line?

Thank you.

ALJ CAREAGA: Thank you, Mr. Herman.

Again, ladies and gentlemen, thank you.

Mr. Ed Anderson, A-n-d-e-r-s-o-n.

STATEMENT OF MR. ANDERSON

MR. ANDERSON: Well, I too would like to voice a complaint that we haven't had very much notification on this thing. (TR. 19-1)

ALJ CAREAGA: Mr. Anderson, could you speak into the microphone?

MR. ANDERSON: Yes. I would like to make a complaint again that we haven't received any notification of the thing. I had to hear it from neighbors to know that there was even a line going to come.

And I would like to point out one of the reasons I bought property out there was the view I get of the mountains, and I really don't appreciate seeing the line come as close as it's proposed to do. As far as I'm concerned, it's a health risk to some of the people in my area. And I would like to speak out that I'm against the thing. TR. 19-2

ALJ CAREAGA: Thank you, Mr. Anderson.

And thank you again, ladies and gentlemen.

Mr. Bill Albright, A-l-b-r-i-g-h-t, representing the San Rafael Park Advisory Board.

Mr. Albright.

STATEMENT OF MR. ALBRIGHT

MR. ALBRIGHT: Thank you. I'm Bill Albright. I'm chairman of the Rancho San Rafael --

ALJ CAREAGA: Please slow down.

MR. ALBRIGHT: And I will slow down.

The combination of scenic beauty, visual prominence and high profile public event makes San Rafael Park property in the county a primary regional park. I am a native, a neighbor to the park. I run the dirt trails and roads of that park several times a week. In fact, I run one trail that approximates this TR. 20-1

proposed route a couple of times a week. And in fact today at 9:00 was there in the mountain snow, sort refresh my memory about what that country looks likes.

The proposed route passes adjacent to the property that was donated to the park by Bill and Beverly Thornton about one and a half years ago. And it passes directly through pastures of Forest Service property that is projected to come into the park in the next couple of years. Excuse me.

I read in the paper a couple of weeks ago that the Washoe County Parks Department has no objections to this proposed route and doesn't have an explanation for their agreement to site the proposed line through San Rafael Park, but last week the Advisory Board did take objection to this idea. We passed a motion disapproving this route, and we requested that the Parks Department write letters to the County Commission and the Public Service Commissions of both Nevada and California disapproving this route. TR. 20-1

I think that since the impacts of that route to the recent and future acquisitions by the park were not well addressed by the report, I only think that the consulting company didn't do their homework on this and find out where the exact boundaries of the park were and where they were projected to be in the very near future. Thank you.

ALJ CAREAGA: Thank you, Mr. Albright.

Ladies and gentlemen, thank you.

Next I'd like to recognize Cynthia Mitchell, M-i-t-c-h-e-l-l, representing Rancho San Rafael Botanical Society.

STATEMENT OF MS. MITCHELL

MS. MITCHELL: Thank you. I have prepared comments.

My name is Cynthia Mitchell, and I appreciate the opportunity to appear before you tonight and talk about this proposed Alturas Project.

I wear two hats tonight. The first is as a consulting economist specializing on a national level in electric utility resource planning and implementation issues. I have worked for about 20 years in this area, and I worked for about eight years as the senior staff economist for the Nevada Consumer Advocates Office from 1981 to 1989. Specifically, I am well aware of the history associated with Sierra's efforts to site and construct a major transmission line similar to the proposed Alturas Project.

The second hat that I wear tonight is that as president of the Rancho San Rafael Botanical Society. With an active membership base of over a hundred, we serve as the organization for the arboretum of service and support that's located within the arboretum in the southeast portion of Rancho San Rafael Park. And as I will discuss in more detail in our comments, our society is very concerned about the recreational, visual and aesthetic impact of the proposed Alturas line.

I want to address first the impacts on the Reno-Sparks community from the proposed transmission line. And in preparing these comments, I have reviewed portions of Sierra Pacific's 1993 resource plan filed in accordance with the Nevada Public Service Commission and then Aspen Consulting's draft EIS.

The EIS represents that the proposed Alturas line is necessary for two reasons.

The first reason is to service the increased demands for electricity in the Reno-Sparks area.

And the second reason is to meet increased mining loads in the northern portion of central Nevada. It is because of the purported need of Reno-Sparks for additional electricity that the company contends that it is necessary to route the proposed line directly into north Reno via the proposed Bordertown substation with the termination at the North Valley Road substation. TR 21-1

Now it's very critical that you consider the importance to the company in using the purported Sparks-Reno need for additional electricity to establish the basis for the routing of the proposed line and location of the new Bordertown substation. If, for example, a more careful analysis of Sierra's 1993 resource plan reveals that it is the projected increase in electrical mining load that is the more significant driver of the company's need for the new line than the growth in Reno-Sparks demographic and economic activity, then the following reasonable and prudent questions must

be asked and answered.

That first question is: Is the proposed route the most direct route available to serve projected increases in mining loads?

Answer: No.

TR. 21-1

Second, is there an alternative route that would more directly and economically service the mining loads and at the same time allow for increased power flows to the Reno-Sparks communities?

The answer to that, short answer again, is yes.

Also consider what happens to the company's proposed route, though, if it can be shown that the underlying basis for the specific routing of the proposed Alturas line is neither mining activity or growth in the Reno-Sparks area, but rather, Sierra's interest in obtaining or opening up a major transmission log jam in the Great Basin.

And that was testified to by Mr. Tom Parker, a gentleman that I have known for many years. He's vice president of resource planning at Sierra Pacific Power Company. And this was before the Nevada Public Service Commission hearings on the proposed Alturas Project. And that was Docket Nos. 93-4001 and 92-5018.

TR. 21-2

Back to the point, Sierra's interest with the Alturas Project and with projects that have been before the Nevada as well as the California Commission's before has been an opening up of what they view as a major

transmission log jam in the Great Basin. And by establishing this major interconnet in the general area where they have focused on, it would allow the company to pull together or to pull power together from other utilities in the region.

And I'm specifically referring to the proposed Bordertown substation with its siting and design specifications. Though not explicitly addressed in EIS, you can see through the siting and design configurations that the Bordertown substation is designed and meant to accommodate much more than this existing transmission line. We can put a second transmission line of this size or even greater in this area, and we can also go forward with the second phase shifter, which is important to Sierra as well. And with this in place, Sierra Pacific will successfully be positioned to become a major mover and shaker in the emerging speculative and highly lucrative regional transmission market.

TR. 21-2

And as you in California know so well, the name of the game in electric utility regulation is quickly shifting from who owns a power plant to who has transmission and who has the transmission access. And this has been a game that has been pursued in northern Nevada by Sierra Pacific for some time.

Many years ago when I was in the Nevada Consumer Advocates Office, Sierra was trying to construct a very similar line to connect to SMUD, Sacramento Municipal Utility District. And the

1 purported reason given, rationale given to the Nevada
2 Commission was that it was to do an economic energy
3 exchange between SMUD and Sierra in each utility's off
4 season. But it was real -- the driving force behind the
5 line was the proposed Thousand Springs Project in
6 central Nevada at that time where Sierra wanted to move
7 into the export markets. And that's again the major
8 driver behind this transmission line.
9 If it was mainly just to service the
10 Reno-Sparks area or to even service the mining loads in
11 northern central Nevada, we'd see not only a different
12 route, but we'd see power being broken down outside of
13 the Reno-Sparks area. TR 21-3
14 ALJ CAREAGA: Ms. Mitchell, I wonder if I could ask
15 you to complete your remarks after we've taken the other
16 speakers. We have time to do --
17 MS. MITCHELL: You know, I'm more than two-thirds
18 finished, and you wouldn't want to give me a chance to
19 catch my breath.
20 Can I at least finish Section G?
21 ALJ CAREAGA: Please finish and we will take other
22 speakers.
23 MS. MITCHELL: I'll just at this point in my
24 comments leave you with this thought, that I'm not
25 against Sierra making a profit. What I am against is
26 Sierra doing it under the conditions in which there
27 would be an inequitable distribution of the economic and
28 environmental costs and benefits of the proposed Alturas

1 Project.
2 While the Reno-Sparks residential and small
3 commercial customers are being asked to absorb a
4 disproportionate share of the environmental and economic
5 costs, mining customers and the company's shareholders
6 are targeted to receive a disproportionate share of the
7 environmental and economic benefits.
8 And as I sit down, I'll leave with you this in
9 closing, that again this is not the first time that
10 Sierra has tried to establish a major interconnection in
11 transmission interchange into Northern California.
12 And it's becoming increasingly important to
13 not only Nevada utilities but California utilities --
14 all around the country to move into the transmission
15 game.
16 But it's important that we realize that the
17 termination point right into Reno-Sparks is critical to
18 the company so that they can justify when they go before
19 the Nevada Public Service Commission cost allocation
20 that will go to the customers that are unable to shift
21 outside of those costs, the residents.
22 The small commercial -- you know, even if you
23 route this line directly to the mining customers, we
24 have to recognize that Pacific Corp is competing to
25 service those customers, and the mining loads with its
26 fluctuations tied primarily to the price of gold going
27 up and down could lead Sierra Pacific into what's
28 commonly referred to in the industry as stranded

investment.

ALJ CAREAGA: Thank you, Ms. Mitchell. I will recognize you again.

Ladies and gentlemen, thank you.

I'd like next to recognize Mr. Ray Kivi, K-i-v-i.

Mr. Kivi.

STATEMENT OF MR. KIVI

MR. KIVI: My name is Ray Kivi. I live at 2430 Sawk Court.

ALJ CAREAGA: Would you please speak into the microphone.

MR. KIVI: That's in Horizon Hills, as well. But my first issue tonight is not as a land owner that's having -- that we have heard about earlier. I'm speaking as a health care provider. I'm a registered nurse also, and I'm concerned about the EMFs.

As was so succinctly pointed out earlier on, Sierra Pacific sent out a pamphlet raising concerns about an electric blanket or a toaster, and then they are proposing a 345 kv power line running through people's back yards into Reno. We've heard much information on EMFs tonight, and I didn't get a chance to bring anything here because I wasn't -- we didn't have the time to prepare for this.

As far as the energy, as it was noted earlier, who is really benefiting from this? The casinos, the mining industry, the developers, a lot. TR. 22-1

Or how much effort has been put into conservative efforts or alternate efforts for energy? TR. 22-1

The map that's on display here, it looks like there is already an existing power route that goes from Oregon all the way to Los Angeles that would require the bypass into Reno-Sparks. And if I read the map correctly, it already can handle 500 volts. I'm not up on -- I'm not an engineer, so I don't know the right equivalent, but there is already a system in place to handle one. Why do we need another one built that will have a reduced capacity to what is already in existence? TR. 22-2

As far as alternative energy sources, Nevada is one of the sunniest states in the nation. Have they looked into more solar areas?

The geothermal capacity, as we have had a lot of earthquakes in the last couple of years. Everyone is well aware of the faults, and potential for geothermal area. TR. 22-3

And also a more aggressive conservation effort.

Just getting into a little bit as a selfish home owner, we moved into Horizon Hills in '81. The main drawing power, as you have already heard from the people that have spoken, is that beautiful mountain behind us. The thought of 145 to 150 foot towers 1200 feet apart with one-inch cable buzzing between them doesn't have a whole lot of appeal to me, and I don't have the luxury of Mayor Broslow to say, well, you know, TR. 22-4

the buck stops where the money is.

Referring to that mountain, it's used by a lot of us in the subdivision along with a lot of people in the area. The Forestry Department has re-marked a lot of trails out there because of the increased use.

And for those of you who aren't familiar with the Nevada desert, it's real subtle. You have to get out there and experience to really appreciate the beauty of it all. As I said, there are a lot of users on that mountain, whether it's people walking, riding bicycles or horses there or just getting out with a vehicle to enjoy the beauty.

TR. 22-4

I'm a little concerned about the process of this whole thing. I see the memo on the door behind me where there was an information meeting on the 17th of last month. I'm just concerned why there wasn't more notice as far as what was going on. I was under the impression tonight that this would be more of an information meeting. That's why I apologize for this kind of ragged format here. I just jotted down quickly on some notes.

TR. 22-5

In closing, appreciate the time to be able to get up and share my opinion with others. My main concern is the health issues. The gentleman from Texas pointed it out earlier, and that needs to be addressed.

Also, once again, who is going to benefit by this project. I think the -- once again referring to Sierra Pacific who sends out the EMF pamphlets and then

it wants to put a power line in. And in closing, just thank you.

ALJ CAREAGA: Thank you, Mr. Kivi.

Thank you, ladies and gentlemen.

The last speaker who has signed up and asked to be recognized -- and if there is anyone else who would like to speak, please fill out one of these pink cards, and we will be glad to recognize you.

The initial F, Kirk, K-i-r-k, Opencrantz, O-p-e-n-c-r-a-n-t-z.

MR. OPENCRANTZ: Opencrantz.

ALJ CAREAGA: Representing Friends of Peavine.

STATEMENT OF MR. OPENCRANTZ

MR. OPENCRANTZ: I didn't plan to speak at this meeting, but I feel that I should.

Friends of Peavine is an organization which was instrumental in getting, in initiating the transfer of 8500 acres of Peavine Mountain from private land to the Forest Service. This was transferred to the Forest Service, I believe, in November.

I put a lot of my own dollars into this, and I didn't realize at the time that Peavine Mountain had been mostly private land. However, there's 8500 acres of Peavine that is now added to the land that the Forest service had, so that it will be available to the people in the Reno area as a public land instead of a private land where access would be lost.

As a group, Friends of Peavine are very

interested in maintaining the aesthetic qualities that are available on Peavine Mountain and the access and use for the future. We hope that Peavine Mountain will be and remain a beautiful natural mountain, and we don't want to see it become a bunch of 40-acre junk yards.

So this is why we are very active in arranging and initiating the process for transferring the land to public domain. We hope that the power company will use appropriate mitigating services that will remove eyesore problems such as painting the towers, locating them where they are not or least visible. TR. 23-1

But as a stockholder in Sierra Pacific and Washington Water Power, who will be the eventual owner of the power company, I feel it is my opportunity to comment on this. And I certainly hope that the power company will use appropriate mitigating -- let's see what the -- can't think of the word I want to use -- when they do put in the power line.

I am somewhat annoyed by the fact that there was not adequate announcement for this, though, I did have maps of the proposed power line which Steve Seigle sent to me. Thank you, gentlemen.

ALJ CAREAGA: Mr. Opencrantz, thank you.

Thank you, ladies and gentlemen.

Is the speaker from Honey Lake -- and I apologize for not remembering your name. Is Rusty still here?

I'll recognize Ms. Mitchell to continue her

remarks.

Off the record.

(Off the record)

ALJ CAREAGA: Ladies and gentlemen, come to order, please.

We have Ms. Mitchell.

STATEMENT OF MS. MITCHELL

MS. MITCHELL: Thank you for giving me a second opportunity to speak. I'll put on my second hat, which I noted earlier was as the President of Rancho San Rafael Botanical Society. We are the service support organization for the arboretum in the park.

And in reviewing Aspen's draft environmental impact statement as it relates to the park, the most striking shortcoming in the impact statement as it relates to Rancho San Rafael Park is both the improper and inadequate characterization of the land use impacts associated with the proposed Alturas line. And consider for a moment the following examples. TR. 21-4

When you look at the various maps that are within the EIS, there's two maps, Map 32 and Map 33, which break the proposed route down into its segments. And Segments X and Y are the two segments of the route where it would come in over Peavine Mountain, skirt the park and then connect in the North Valley substation.

These maps are dated 1982. We're working with very old, old data when we come to this environmental impact statement, so old that, as Mr. Albright, Chairman

of the Rancho San Rafael Advisory Board mentioned earlier in his comments, that the environmental impact statement does not even properly recognize the park boundaries. They have the park boundaries drawn without the existing lands that were donated to the park by Beverly and Bill Thornton. TR. 21-4

When those lands are included, you have this transmission line --

ALJ CAREAGA: Excuse me, could you spell that name?

MS. MITCHELL: Thornton, T-h-o-r-n-t-o-n.

ALJ CAREAGA: Thank you.

MS. MITCHELL: In addition, the land use characterization associated with the EIS as it relates to the park is improper in that Aspen failed to recognize that there is a parcel of current Forest Service land that is scheduled for transfer to Rancho San Rafael Park, which when this occurs would make a proposed route actually going across park lands. We would no longer have a situation of just having this transmission line come right along the border of park lands, but will actually have the transmission line running through a major regional park. TR. 21-5

The draft EIS land use characterizations are also inadequate in that Aspen Consulting failed to consider the site-specific land use characteristics associated with urban development and park land recreational use.

As proposed, the transmission corridor would run not only through open urban space and a regional park that's been designated by the county for a green belt, but visual and recreational qualities that will significantly be undermined by the proposed Alturas Project. And there is also a further concern that we need to be looking at here which the Aspen EIS does not take into consideration, and that's the adverse precedent-setting nature of the proposed project on urban and recreational land use. TR. 21-5

And there are three factors that should be considered that have not been considered.

The first is the precedent this project would set for the inclusion of additional smaller transmission and distribution lines through the proposed 345 kv corridor.

The second is the precedents that this project would set for all other parks.

And third is the precedents that this project would set as to the tremendous preservation of open spaces surrounding -- open urban spaces surrounding parks.

You know, there was at one time a proposal to bring this line down through the North Valley, and thus it would be impacting Sparks. And we have on record a letter -- I don't have it. I thought I had it here, but it's a letter, I think it's dated back in August of 1994 from the Sparks City Council to Aspen Consulting TR. 21-6

basically stating no, this cannot happen because you will be impacting a proposed regional park. This is coming out of the Sparks City Council.

They have the proposed regional park on the books. It's not yet developed, but they were -- those elected officials were clear enough to recognize that this is just something that you don't do. You don't do it today either. TR. 21-6

I'd also ask that in your review of the draft EIS that you specifically -- I found the letter. It's an August 22, '94 letter to Aspen Environmental Group. And in their section on observations as to the environmental considerations of the alternate route, they state that there are a number of public recreational facilities within the city in the form of the 13 acre park and in the form of a regional park facility which would be adversely affected by this additional corridor. TR. 21-7

And then in your review of the EIS, please look specifically at Section A that allows recreational, education, religious or scientific uses, and note that at page C-8-8 under Segment X, which is the specific land section that we are talking about here in terms of Rancho San Rafael Park, and then again at page A-20 in terms of Washoe County's comprehensive plan.

And then on -- again at page A-61, again in regard to the Peavine peak alignment, there is no mention of Rancho San Rafael Park.

And again, you'll see the same type of inadequacies and void of any recognition there that there is a regional park through this, that this transmission line would not only just skirt, but actually come through, if you look at Part C-13 on the visual resources. TR. 21-7

ALJ CAREAGA: Thank you, Ms. Mitchell. I will give you an opportunity to finish your remarks after the question and answer period, but in fairness to those who have been waiting for that, I would like to get to that now.

MS. MITCHELL: Okay, thank you.

ALJ CAREAGA: We will go off the record in order to have informal questions and answers.

(Off the record)

ALJ CAREAGA: We will be on the record.

We have been off the record for approximately 25 minutes in the informal question and answer period, and I now wish to recognize Ms. Mary Toleno, T-o-l-e-n-o, who has asked to speak.

STATEMENT OF MS. TOLENO

MS. TOLENO: Hello. My name is Mary Toleno and I live in the Horizon Hills.

And I noted that no one has mentioned that we live in an extremely high wind area, because there are thermal currents there every night at 5:00 o'clock. So I can leave any job in Reno standing up straight, but when I get out of the car at home, I have to kind of TR. 24-1

hold on because it's very high wind there.

And early in the morning there also it's very high wind. And many times we have gusts up to 100 miles an hour. All this has been officially reported. And I'd say we probably have a steady winds of about 30 miles an hour many hours of the day. (TR. 24-1)

And with that ringing through Sierra Pacific Power's power line, which will act, I think, like a harp, I think that's something people should consider when they think about putting something in somebody else's neighborhood that is as big as they are proposing.

And someone mentioned a fault line, which concerns me as well. (TR. 24-2)

Something else that bothers me about this is that I feel that the people who live in our area put their heart and soul into their homes. And at this point if Sierra Pacific proceeds with this project, the property values will be so damaged that we will be trapped there. No one will want to buy our houses. We can't move away to maybe a neighborhood where some executives might be able to afford. We can't sell our houses once you do this to us. (TR. 24-3)

And so, you know, I have this sense of feeling kind of trapped by the decisions of everyone else.

And I would just like to make one more comment, and that is, that given the amount of bad feeling that such a mammoth project generates, isn't it

reasonable to think that since we have gotten along all this time with smaller portions of power, that if you were to build power lines that weren't so mammoth and didn't have such a huge impact, you would have less alienation of the customers you propose to serve?

And that brings up again this point of why wouldn't you use an existing line where you are not alienating and causing pain and pitting neighbor against neighbor.

So thank you very much.

ALJ CAREAGA: Thank you, Ms. Toleno.

Thank you, ladies and gentlemen.

Is there anyone else who has not yet spoken that wishes to be recognized?

If you could go to the table and fill out a pink card, I will recognize you. And I will also recognize at this point anyone who has previously spoken would wishes as a result of the question and answer period to add to their remarks.

ALJ CAREAGA: Ms. Burke, would you please come to the microphone.

STATEMENT OF MS. BURKE

MS. BURKE: I just wanted to point out one --

ALJ CAREAGA: Would you please come to the microphone.

MS. BURKE: I just wanted to point out one particular section of the line, that I would like to have specific -- site-specific information, referred to (TR. 11-2)

in the EIS-EIR, and that is Segment X again, but the segment that goes next to the north foothills. In this segment there is an existing high-pressure gas line. There is an existing 115 kv power line. There is an existing 60 kv power line. And the combination of those three is referred to as potentially problematic in terms of EMF, et cetera, but there is nothing about that specific or any modeling about those specific issues in the EIR/S. And I would like that information to be provided, and I would like it to be provided by an independent source.

TR. 11-2

Would that require us to go through a different process where we ask for that kind of thing?

Sierra Pacific being the proponent and also being the main provider of the information, is there a way we can ask for that to be separately monitored before it becomes part of Aspen's record?

ALJ CAREAGA: Ms. Burke, I can't take questions during this part of it because the purpose is to receive oral comments on the environmental impact report.

MS. BURKE: Then I'll just ask that that be done.

ALJ CAREAGA: Thank you, Ms. Burke.

Is there any other speaker to be heard?

No one else?

Now I forgot your name.

MR. SMYRES: Gary Smyres.

ALJ CAREAGA: Would you come to the microphone to speak?

STATEMENT OF MR. SMYRES

MR. SMYRES: One brief comment. I'd like to correct one statement.

I said the power line would be crossing BLM land. It is Forest Service land.

And also, since the people that are making the decision are apparently from California, I'd like to give you an idea as to how large San Rafael Park is. Slightly larger than Golden Gate Park. When it's fully developed, you'll have the same features that you have in Golden Gate Park.

TR. 15-3

And so I think that this is a very important park to the area, and I hope there is no high power line crossing the center of this. Thank you.

ALJ CAREAGA: Thank you, Mr. Smyres.

Thank you, ladies and gentlemen, for again expressing your opinions in an orderly fashion.

Other speakers who have spoken before who wish to be recognized?

Ms. Orozco.

STATEMENT OF MS. OROZCO

MS. OROZCO: You have a good memory.

I was sitting back listening to all the comments about the neighborhoods, particularly in Horizon Hills. And one question occurred do me, and I'd like to make note of it.

I was wondering if there was any impact study upon children waiting for school buses, while waiting

TR. 9-5

468

for buses underneath this transmission line, and what effect waiting 20 minutes underneath a transmission line would have upon their health. Thank you. TR 9-5

ALJ CAREAGA: Thank you.

Other speakers who have signed up and who wish to speak again?

My memory is not that good. Did you wish to speak again? No.

Yes, ma'am.

MS. MUCKENTHALER: I do.

ALJ CAREAGA: Would you please come to the microphone, and is it Miss Muckenthaler?

STATEMENT OF MS. MUCKENTHALER

MS. MUCKENTHALER: My name is Pam Muckenthaler. I too live in Horizon Hills, and I have a comment. I think the lady here, Mary, said it real well. I feel trapped already, and I already know of existing neighbors -- one is my best friend, who is already talking to realtors to see if they can get out before it's too late.

And one closing comment. I feel like a little mushroom. I feel that I have been fed a lot of BS from the people from California, and I think it's really inconsiderate that you did not take and consider us people who it's affecting most.

ALJ CAREAGA: Thank you.

Thank you, ladies and gentlemen.

Are there other speakers who have spoken

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

469

before who wish to be recognized as to their remarks?

Ms. Mitchell

STATEMENT OF MS. MITCHELL

MS. MITCHELL: Thank you. My name is Cynthia Mitchell. I wanted to follow up on the comment by Mr. Smyres about making sure that you understood the size and importance of Rancho San Rafael Park and how, when this park is fully developed and built out, it will be the size and magnitude of Golden Gate.

And Sierra Pacific has represented time and again that they have worked strenuously with all the groups to mitigate the adverse environmental impacts associated with the proposed Alturas Project. But to date, nothing has been done to recognize, much less try and mitigate, the impacts to the park.

And when it comes to a major transmission corridor such as this with structures that are going to be in excess of 100 feet in height and in excess of 7 feet in diameter at the base, there is no way to minimize the impact associated with that transmission line in a park except to take it out and to take it far, far away. TR 21-8

On the scale, proposed transmission lines and parks are not compatible. Rancho San Rafael Park was properly here first. Both Sierra and Aspen Consulting should be reprimanded and sent back to the drawing board for failing to include the park's consideration in their EIS. When such proper consideration is given, the only

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SAN FRANCISCO, CALIFORNIA

1 responsible and prudent course is to find an alternative
2 route. TR. 21-8
3 And to just take one more minute, I would like
4 to emphasize again the point that I began with about the
5 impact on the communities of Reno-Sparks and emphasize
6 that everyone needs to recognize this project is more
7 than just growth in Reno-Sparks. It's more than just
8 growth in mining load. It's a major interconnection
9 into California's lucrative transmission markets.
10 And the citizens of Reno and Sparks, we are
11 going to get this line. We don't need it. We don't TR. 21-9
12 need it in this magnitude. We don't need it in this
13 cost, and we do not need it with the proposed
14 environmental impacts.
15 But as largely captive customers to the
16 utility, we're very important to Sierra in their ability
17 to compete with Pacific Corp for the lucrative mine load
18 that they are trying to continue to hold and also with
19 Sierra's interest in developing a gateway into the
20 regional transmission market. Thank you very much.
21 ALJ CAREAGA: Thank you, Ms. Mitchell.
22 Thank you again, ladies and gentlemen.
23 Are there other speakers who have previously
24 spoken who wish to be recognized?
25 Yes, ma'am. Would you please come to the
26 microphone and state your name again for the record.
27 STATEMENT OF MS. TOLENO
28 MS. TOLENO: My name is Mary Toleno. And as I

1 imagine this project being built, I wonder if people
2 realize how fragile these hills are above Horizon Hills
3 since there has been a fire there. If you even walk
4 three times in the same pathway, it turns to dust. And
5 when you get heavy equipment in there to put up those TR. 24-4
6 mammoth poles, what's it going to do to tear up that
7 hillside and give us dust all day?
8 And with that wind blowing, it blows off of
9 the mountain and across down over Horizon Hills, I think
10 it's going to be quite a lot of trouble.
11 And also just our roads within Horizon Hills,
12 even our little two-lane asphalt roads, how are they TR. 24-5
13 going to hold up under the stress of the kind of
14 equipment you guys are going to have to bring in to get
15 your job done? Thank you.
16 ALJ CAREAGA: Thank you, Ms. Toleno.
17 Thank you again, ladies and gentlemen.
18 Ladies and gentlemen, I thank you very much
19 for your comments and cooperation this evening. I'd
20 like to remind you again that you have the opportunity
21 to comment in writing. If you wish to do so, you should
22 file your comments as soon as possible, but postmark
23 them no later than May 3rd, 1995.
24 Written comment on the draft EIR/S must
25 reference PUC Application No. 93-11-018, and please see
26 me after the meeting and I can go over this with you
27 more slowly. Also BLM Application No. CACA 31406.
28 Comments should be addressed to Julie Halligan

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COMMENTS FROM SIERRA PACIFIC POWER COMPANY (APPLICANT)

RECEIVED JUN

Sierra Pacific
POWER COMPANY
Meeting the future with energy
6100 Neil Road, PO Box 10100, Reno, Nevada 89520 0400 • 702 689 4011

Applicant Comment Set 1

Julie Halligan, California Public Utilities Commission
Peter Humm, U. S. Bureau of Land Management
c/o Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, California 91301

June 1, 1995

RE: **Alturas Transmission Line Project**

Dear Ms. Halligan and Mr. Humm:

We respectfully submit these comments on the Draft Environmental Impact Report/Environmental Impact Statement ("Draft EIR/S") for the Alturas Transmission Line Project. We have also enclosed a compilation of technical comments prepared by our environmental team.

1. **Project Objectives and Need (Section A.6.2.1)**

The Sierra Pacific Power Company ("SPPCo") system demand and load information presented in Draft EIR/S provides a comparison between Sierra's forecasted loads and actual loads. We recommend that the Final EIR/S explain the reasons for the variance between forecasted and actual loads. We offer for your consideration the following suggested addition to the text:

"Sierra's 1993 and 1994 system peak loads did not reach forecasted levels in large part due to unusually cool weather during the 1993 summer peak and warm weather during both of the winter peaks. In addition, several customer loads were lower than forecasted due to delays in their planned load additions. Both of these factors will be minimized -- and the variances between actual and forecasted loads will be reduced -- as more normal temperatures return and as planned customer load additions are implemented." A. 1-1

We also suggest adding to Section A.6.2.1 a brief explanation of Sierra's wholesale wheeling customer loads, since these loads are not otherwise included in the customer load forecast. Increased demand for wholesale wheeling is an integral part of the need for and timing of the Alturas project. More detailed information on this issue was provided to the CPUC in Sierra's response to data requests (Item 14 in Response of October 17, 1994 and Item 15 in Response of August 15, 1994). The information from these data requests is summarized below for potential inclusion in the text of the Final EIR/S: A. 1-2

2

"Sierra also supplies transmission wheeling services to wholesale utility customers in northern Nevada and eastern California. These utility customers purchase some or all of their energy needs from suppliers outside the Control area, and access these supplies via Sierra's transmission interties. Wholesale utility wheeling requirements are growing significantly as can be seen by the information provided in the following Summer and Winter Wheeling Demand Tables:" A. 1-2

Summer Wheeling Demand	1993	1994	1995	1996	1997
Mt. Wheeler	27.1	27.7	38	100	100
Harney Electric	28.6	30.4	30	45	45
Wells Rural Electric*	37.8	34.4	69	72	75
Truckee Donner Public District	-0-	-0-	7	7	19
Total	93.5	92.5	144	224	239
Growth %	5.7%	(1.1%)	55.7%	55.6%	6.7%

Winter Peak Demand	1993	1994	1995	1996	1997
Mt. Wheeler	24.5	21.1	64	82	82
Harney Electric	-0-	10.1	10	25	25
Wells Rural Electric*	40.5	60.2	73	76	77
Truckee Donner Public District	-0-	-0-	7	28	29
Total	65.0	91.4	154	211	213
Growth %	3.7%	40.6%	68.4%	37.0%	.9%

* Wells Rural Electric loads are forecasted to exceed their 65 MW wheeling agreement with Sierra. The additional load will be served by Sierra generation until the Alturas Project is constructed.

We also have several technical corrections to the information presented in this section of the Draft EIR/S. These corrections help clarify Sierra's urgent need for additional delivery capacity from the construction of the Alturas project to meet existing and forecasted customer loads. This information was supplied in greater detail in Sierra's responses to past CPUC data requests (Item 14 in Response of October 17, 1994 and Item 15 in Response of August 15, 1994). We request that this information be presented in the Final EIR/S:

Wells Rural Electric. Sierra's wheeling commitment to serve Wells is currently 65 MW, rather than the 45 MW indicated in the Draft EIR/S. The above table also shows that the actual Wells load was 60 MW coincident with Sierra's 1994 winter peak. Sierra has agreed to increase the Wells wheeling commitment to 80 MW after the Alturas project is in service, but the Wells load is anticipated to exceed the 65 MW limit before the 1995 summer peak. The Wells load in excess of 65 MW will be served from Sierra's native A. 1-3

generation sources rather than imported from BPA sources until the Alturas Intertie is in service.

A. 1-3

Harney Electric. The BPA/Harney wheeling agreement is currently 30 MW in the summer, rather than the 23 MW indicated in the Draft EIR/S. Harney has expressed a desire to increase the summer transfers and extend the contract to a year round wheeling operation. Also, please refer to the table above which illustrates the 10 MW, 1994 winter wheeling service Sierra provided for the Harney loads.

Truckee Donner Public Utility District. The Truckee Donner Public Utility District (TDPUD) has requested wheeling services for their entire load. Sierra reached an agreement with TDPUD to provide 7 MW of wheeling service until the Alturas project has been completed. TDPUD also expressed concern that the Alturas project may be delayed; Sierra has assured them that we would diligently pursue the December 1996 completion and energization date for this critical project.

Mt. Wheeler. The Draft EIR/S accurately describes the conditions to serve the new 60 MW Mt. Wheeler load which will require service prior to completion of the Alturas Intertie.

A. 1-4

Washington Water Power. Sierra's planned merger with Washington Water Power will create operational savings as explained in greater detail in our response to a past CPUC data request (Item 27 in Response of August 15, 1994). The merger savings described in that Response will be delayed until the Alturas project has been completed and energized. This is an additional factor in completing the Alturas project on the projected schedule.

Conclusion. Sierra's existing transmission system is not adequate to meet customer demand for firm transmission wheeling services. Interruptable service is currently provided to 65 MW of Wells load. The planned Mt. Wheeler 60 MW load addition will also be subject to service interruptions when Sierra's transmission interties open. Harney also needs increased wheeling services. TDPUD has also requested transmission, and has been forced to limit use of the transmission interties until the Alturas project has been completed. This need for additional import capacity is a primary objective which is driving the planned December 1996 completion and energization date for the Alturas project. This need currently exists, and is anticipated to become more acute in both winter and summer peak load periods. Meeting the present unmet need, and meeting forecasted needs, requires that the Alturas project be completed as soon as possible, and not later than the December 1996 projected energization date.

2. **Electro Magnetic Fields (Section C.8)**

We are also very concerned about the unprecedented 300-foot separation required between structures and residences in Mitigation Measures L-8 and L-13. This is inconsistent with the CPUC's established EMF policies (see generally, OII.91-01-012, discussed on page C.10-40 of the Draft EIR/Sand specifically CPUC decision No. 93-11-013 discussed on page C.10-41 of the Draft EIR/S). There are no other applicable land use requirements (zoning, use permit restrictions, etc.) which impose such a setback requirement.

There is no scientific consensus that health risks are caused by EMF exposures, and in fact, the scientific community has generally agreed that there is no established nexus between EMF and any adverse health effects. This type of setback requirement, if adopted, would be a major policy deviation for the CPUC, BLM and other land management agencies; given the time and resources expended by the CPUC and other agencies in exhaustively and comprehensively examining EMF issues in other proceedings, it is simply inappropriate to unilaterally reverse these EMF policy decisions in a project-specific EIR/S.

A. 1-5

The approach taken in the Land Use section of the Draft EIR/S, if consistently applied to future transmissions line siting decisions, would also have extraordinarily vast and extremely costly consequences for ratepayers and utilities throughout California (and other Western States if this policy is also being adopted by the BLM). The approach taken in the Land Use section is also inconsistent with the more comprehensive and consistent EMF analysis and mitigation recommendation presented in the Public Health and Safety section of the Draft EIR/S (Section C.10). In particular, that section of the Draft EIR/S appropriately concludes:

> SPPCo has incorporated some of the most cost-effective techniques currently available for the reduction of EMF strengths resulting from the Proposed Project. These measures are consistent with the CPUC No-Cost/Low-Cost EMF mitigation Policy. No further mitigation measures are recommended (Class III). (Draft EIR/S p. C.10-43)

We strongly request that the Land Use discussions regarding EMF be deleted, and that this issue continue to be comprehensively addressed in the Public Health and Safety section. If a discussion of EMF remains in the Land Use section, please consider making the following text changes to ensure internal consistency and compliance with CPUC standards in the Final EIR/S:

- Page C.8-29, ¶ 4/text beginning on Line 5: Modify as follows:

  > .... near the residential property and in the views from the residential uses from the project facilities."

  The reference to EMF has been deleted since it was considered a Class III impact in Part C.10 Public Safety and Health (C.10-43). Therefore, the "character of the environment" will not change as a result of EMF.

- Page C.8-30, ¶ 3/Sentence beginning on Line 8:

  > ~~As proposed, the alignment for the Proposed Project is separated from sensitive receptors by a minimum of 300 feet, except for a residence on Segment L (150 feet from centerline) and the North Foothill Apartments on Segment X (100 feet from centerline).~~ As discussed in detail in Part C.10 Public Safety and Health, the applicant has incorporated some of the most cost-effective techniques currently available for the reduction of EMF strengths resulting from the Proposed Project. One of those techniques was trying to route the Proposed Project so as not to come within 300 feet of existing development. These measures are consistent with the CPUC No-Cost/Low Cost EMF Mitigation Policy.

- Page C.8-31, ¶ 1/Line 1: Mitigation Measure L-8 should be deleted in its entirety.

- Page C.8-49, ¶ 5/Line 1: Mitigation Measure L-13 should be deleted in its entirety.

A. 1-5

3. **Arbitration Requirement for Perceived Property Value Diminution from EMF and Private Viewshed Impacts (Section C.8)**

Mitigation Measure S-1 establishes an unprecedented arbitration requirement for property value diminution claims which could be made for any property owner (whether or not the property is on or adjacent to the Alturas transmission line) who assets a claim for lost property values due to EMF or private viewshed impacts. There are numerous reasons why neither Sierra Pacific nor any other regulated utility can agree to such an open-ended dispute process for wholly speculative economic claims.

First, this economic compensation measure for perceived property diminution claims does not "mitigate" any significant impact to the physical environment. Even assuming the worst case -- that a particular property valuation was diminished by the

A. 1-6

project -- the fact is that this is a wholly economic impact which is not appropriately included in an EIR/S. As noted most clearly in CEQA Guidelines § 15131(a):

> Economic or social effects of a project shall not be treated as significant effects on the environment.

This mitigation measure is accordingly neither appropriate nor required by CEQA, NEPA, or any CPUC or BLM regulation or policy, or any law, regulation or policy of any other responsible federal, state or local agency.

Second, the measure as structured would create a compensation entitlement for impacts which the Draft EIR/S has already confirmed would be less than significant. Section C.10, for example, confirms that EMF is a Class III (less than significant) impact. Similarly, the significance criteria used in Section C.13 confirms that private viewsheds from individual owners are not potentially significant aesthetic impacts. In short, there is no significant underlying environmental impact which may in turn give rise to a potential property diminution claim. Whether such a claim is valid, and whether any party has a right to compensation in the event such a claim is valid, is a complex matter of property, contract, tort and related legal theories and entitlements. A mitigation measure which imposes an arbitration requirement assumes that the underlying claim has some validity, and there is simply no basis for this underlying assumption.

A. 1-6

Third, the administrative burdens and costs associated with this open-ended arbitration process are enormous. Anyone unhappy, at any time, with the assessed or transaction valuation of his or her property can apparently activate the arbitration process merely by making an allegation of some nexus to the Alturas project. For example, at any time an absentee property owner several miles away from the project can assert a potential diminution in value due to EMF or viewshed impacts. There is simply no basis for imposing this type of unprecedented dispute claims process on Sierra Pacific as part of the NEPA/CEQA process. As with the EMF setback mitigation discussed above, this mitigation requirement would also create and unprecedented new requirement which would impose an enormous and very costly policy change affecting all utilities which are subject to CPUC and BLM jurisdiction. There is simply no legal, evidentiary or policy basis for unilaterally imposing such a change in a project-specific EIR/S.

Fourth, there is a very established process by which Sierra Pacific will be compensating owners through ROW easement agreements. Compensation for these types of direct economic impacts to ROW properties is likewise outside the scope of the EIR/S process, and is appropriately not addressed with a separate mitigation requirement. Mitigation S-1 is even less appropriate in this Draft EIR/S in that it requires compensation mitigation for speculative, offsite, Class III (insignificant) impacts.

Fifth, the Draft EIR/S provides no factual analysis or evidence in support of the underlying assumption in Mitigation S-1 that property diminution will in fact occur due to

EMF or visual impact issues. Summarizing a national study of these and related property valuation issues, "The Effects of Overhead Transmission Lines on Property Values - A Review and Analysis of the Literature - Edison Electric Institute Siting and Environmental Planning Task Force - July 1992," found:

> The appraiser studies since 1975 have covered many different places in the United States, examining primarily residential and agricultural property. About half of the studies concluded that transmission lines had not affected property values. Price differentials for residential homes were generally found to be quite small (on the order of 5 percent or less) while price differentials were occasionally much higher (sometimes 20 percent or above) for agricultural property . . .

A. 1-6

In summary, there is simply no legal or factual basis for Mitigation S-1, nor is there any basis for unilaterally imposing such an open-ended and costly new property compensation requirement on utilities in a project-specific EIR/S. This mitigation requirement should be deleted in it entirety.

4. **Border Town Substation (Section A.6.3.3)**

We suggest that additional information be provided in the Final EIR/S to more fully explain the need and siting criteria for the Border Town Substation. Some text references to this component of the Alturas project also require clarification or correction.

The Draft EIR/S at one point indicates that the "location of the phase shifter and reactors is not limited to any specific location along the line." (Draft EIR/S p. A-24, ¶ 1) There are several reasons this statement is inaccurate; in fact, it is critical that the reactors be located near the Intertie terminals to perform their intended function.

- Operations personnel must rapidly respond to equipment alarms and malfunctions since the phase shifter is a critical component of the Intertie. The responding personnel will be based in Reno; therefore, their response time will be increased if the phase shifter is moved away from Border Town and towards the Alturas terminal.

- As noted in the Draft EIR/S [Page A-23, section A.6.3.2, and Page A-32, section A.6.7.5], the Lassen Municipal Utility District (LMUD) and Plumas Sierra REA may tap the Intertie at a later date. If the phase shifter is moved beyond the potential tap sites, then it may need to be moved to a new site at the time a tap is made. The future relocation effort would cause additional

A. 1-7

environmental impacts, and be a costly and unnecessary economic burden to impose on ratepayers.

- The performance of the Intertie is adversely impacted as the phase shifter is moved north. This device consumes VARs. The source for VARs is stronger at the southern terminal than the north. The Alturas Intertie's transfer rating and Sierra's system import capability would be adversely impacted if the phase shifter is moved north.

- The specific location of the Border Town reactor and phase shifter was selected based on environmental and economic criteria. First, the proposed site would minimize the potential adverse environmental impacts associated with the earth removal necessary to locate this equipment at North Valley Road. (See also, Draft EIR/S p. B-20, ¶ 2: page B-62, ¶ 3) Second, the proposed site would result in a savings to the ratepayers of between $3 and $9 million as compared to the alternate location at North Valley Road.

We suggest that these issues be clarified in the Final EIR/S. To correctly reflect the need for the Border Town Substation, we suggest that the following text be included in the Final EIR/S:

A. 1-7

> "The physical location of the phase shifter and reactors is important to the overall performance of the Intertie. Reactors must be located near each of the Intertie termination points to properly control system voltages. As a critical control component of the Intertie, the phase shifter must be located near the operating personnel who will respond to equipment malfunctions. The Alturas Intertie's power transfer capability is dependent on the phase shifter location. The power transfer capability and Sierra's system import capability will be reduced if it is moved north. If the phase shifter is located too far north then future system connections for LMUD and/or Plumas Sierra REA may result in the need to relocate the phase shifter.
>
> There are two primary reasons the Border Town location was selected by Sierra. The first is environmental: this location was environmentally superior for several reasons, including the fact that the alternate potential site at the North Valley Road substation would result in significant adverse visual and construction impacts to the Reno and Sparks communities. The second is economic protection of ratepayers: the estimated cost would be between $3 and $9 million less than if the North Valley Road Substation was used for the reactors and phase shifter. Border Town also has the advantage of providing a convenient ,cost effective location for a substation to help supply growing demand in the North Valleys area."

5. **Offsite Compensation Mitigation Requirements for Less Than Significant Impacts (Section C.3)**

Substantial and very costly offsite compensation requirements have been included in Mitigation Measures B-1, B-3, B-4, B-5 and B-21. The magnitude of these compensation requirements does not appear to be appropriate based on the significance criteria included in CEQA or other applicable laws or regulations. For example, CEQA Guidelines Appendix G provides that project impacts will normally be considered significant if the project will:

- Substantially affect a rare or endangered species of animal or plant or the habitat of such species
- Interfere substantially with the movement of any resident or migratory fish or wildlife species
- Substantially diminish habitat for fish, wildlife or plants

A. 1-8

In several locations, the DRAFT EIR/S appears to assume that any impact to such resources is significant, that onsite habitat restoration work will not be adequate, and that offsite mitigation compensation would be required. We respectfully disagree with this analysis. For example, impacts to tenths or one-hundredths of an acre are not "substantial" or "significant" if thousands or millions of acres of similar habitat exist in the region, and if the species of concern that are or may occur in such areas are not rare, threatened or endangered. Accordingly, we believe that the mitigation compensation requirements imposed for common habitat types such as juniper woodland and sagebrush scrub are not warranted or appropriate.

Another example is the mitigation required in the area of the proposed Devils Garden Substation site. This is a designated firewood tree cutting area, yet mitigation is required for tree removal. To the extent that tree removal in this area causes any type of impact, it is limited in scope to reducing the amount of wood which would otherwise be available for tree removal purposes. This is an economic impact which should not warrant environmental mitigation.

6. **Geotechnical Mitigations (Section C.6)**

Several mitigation measures in this section (G-2, G-3, G-4, G-5, G-6, G-7, G-14) reference the need for more detailed geologic investigations. We take this opportunity to request clarification on the scope of such an investigation. It is our understanding that a pre-construction geotechnical/engineering geological analysis will be conducted to ensure that the project will meet all applicable federal, local, California and Nevada geologic and engineering standards. This more detailed pre-construction analysis will address all

A. 1-9

geologic and geotechnical factors related to design and construction of this project, including any further information which becomes available to more precisely delineate areas of active and potentially active faults.

A. 1-9

We do not believe that this project could result in any real or perceived increase in seismic risk. We agree that prudent design practice, however, dictates that, where practical, foundations not be placed within a fault structure in order to avoid ground movement, difficult soil and/or bedrock and groundwater conditions. We are concerned that the Draft EIR/S could be read to restrict the location of overhead transmission lines without regard to the line structures. We request that the Final EIR/S clarify that transmission lines will necessarily cross active fault zones; however, the large span length and tower design will tolerate seismic deflections far greater than the maximum horizontal or vertical offsets anticipated from worst-case fault movements.

A. 1-10

We also request that the Final EIR/S note that legislation regarding earthquake fault zones (EFZ), originally established as special study zones (SSZ) by the 1972 Alquist-Priolo Act, was designed primarily to protect occupied structures and is not necessarily applicable to transmission line projects in remote, unpopulated areas. Structural and foundation design of the transmission line is controlled by wind and ice loads, which will be far in excess of even worst-case seismic loading on the project.

A. 1-11

Finally, we recommend that the seismic mitigation requirements (G-2 through G-6) for future study clarify that the project is required to comply with all applicable requirements regarding seismic safety, and that no adverse health or safety impacts (in populated EFZ areas) will occur as a result of the project. Future studies are not appropriate as mitigation; and any future studies which may need to be performed should be limited to verifying that project will meet these performance criteria. Consistent with this approach, Mitigation Measures G-2, G-3, G-4, G-5 and G-6 could be combined to read as follows:

> Prior to construction, the applicant shall conduct a geotechnical/engineering investigation to more specifically identify fault traces along the approved ROW so that faults can be avoided during tower sitings. Detailed geologic investigation may be necessary in certain active and potentially active fault areas where the trace is not sufficiently defined by surficial geologic features. Although transmission lines will necessarily cross both active and potentially active fault traces, the flexibility inherent in the transmission line system will readily tolerate horizontal and/or vertical displacements far in excess of the magnitude anticipated from worst-case fault rupture. The geotechnical/engineering geologic study shall be submitted for review to the appropriate agencies.

A. 1-12

Additionally, it is not standard or prudent practice to conduct detailed stability investigations at each proposed structure site or access road along a transmission line alignment. The pre-construction geotechnical/engineering investigation will identify areas

A. 1-13

with significant potential for slope instability so that these areas can be avoided. It is suggested that mitigation measure G-7 be revised as follows:

> The geotechnical/engineering geologic investigation will identify unusual slope stability situations so that construction can be avoided in these areas. The investigation should provide recommended stable cut and fill slopes for permanent and temporary roads in a variety of soil and bedrock conditions. The vast majority of access roads will be minimal disturbance features, designed for construction access and infrequent maintenance.

A. 1-13

We are also concerned about the feasibility, cost and necessity for mitigation measure G-14, requiring future studies for shrink-swell potential. The alignment will require over 700 tower sites. The pre-construction geotechnical/engineering geologic investigation will provide foundation recommendations for groups of transmission structures with similar geotechnical conditions. Shrink-swell potential, like any other potential geotechnical problem, will be identified in the report and foundation design will incorporate any unusual mitigation requirements. However, transmission line foundations will be deeper than four feet and are heavily loaded; accordingly, these structures are not normally affected by shrink-swell soils, regardless of the thickness of the clay soil profile. Given this information, we suggest that this measure be revised to read as follows:

> The project geotechnical/engineering geologic investigation shall identify foundation difficulties, including the presence of expansive soils, and include design and construction requirements for the most cost-effective foundation methods needed for areas of unusual soil or other geologic situations.

A. 1-14

Finally, we are very concerned about the timing and logistics of requiring BLM and CPUC approval of the project design as a mitigation measure. The appropriate agency review mechanism is the mitigation monitoring plan, which is designed to provide lead and responsible agencies with an effective method of assuring that the mitigation performance criteria specified in the EIR/S are implemented. Implementing this approach, as required by CEQA and NEPA, could be achieved by combining G-5 with G-6 with the following revisions:

> The project geotechnical/engineering geologic investigation will provide regional seismic criteria evaluation for design of project facilities. To minimize potential damage from ground shaking, liquefaction, and slope movement resulting from an earthquake, the applicant shall design transmission line structures using project specific criteria in accordance with the latest revision of CPUC General Order No. 95 and the National Electric Safety Code, ANSI-C2. Substation facilities shall meet the appropriate design criteria contained in the most current Uniform Building Code (UBC) for the seismic zone in which they are located.

A. 1-15

7. **Impact to Wildlife Conservation Areas (Section C.8)**

We are concerned that project impacts in Wildlife Conservation Areas have been substantially overstated, and we also have questions regarding the methodology used in Table C.8-3.

For example, Table C.8-3 provides degradation factors for existing conditions on state wildlife areas. We have several concerns regarding this methodology. First, the assignment of factors appears to be arbitrary in that there is no analysis or explanation as to what contributes to these factors. We believe that the most critical issue to be evaluated is the habitat value of the parcel.

In Sierra Pacific's review of these parcels, it was evident that not all parcels had equal value from a habitat or wildlife management perspective. A percentage multiplier (where a parcel with outstanding characteristics had a value of one and those with lesser characteristics, a value less than one) should be included in the equation.

Additionally, even though the powerline would be present in the ROW, significant wildlife values will continue to exist in this area and wildlife will still be using a majority of the 814.28 acres noted as requiring compensation in Table C.8-3. The compensation equation should also reflect this substantial, post-construction wildlife value.

We have also learned that the California Department of Fish and Game (CDFG) is in the process of a land exchange with the Bureau of Land Management involving the Doyle Wildlife Conservation Area. Therefore, no compensation would be paid to the CDFG for the presence of this proposed project since the project will ultimately, no longer affect a WCA.

A. 1-16

In conclusion, please find enclosed a set of technical comments consisting of suggested corrections and recommended changes to the document. Your consideration of our concerns, and incorporation of these changes into the Final EIR/S, are very important to Sierra Pacific. The Alturas Intertie Project Staff is available to provide any assistance you or your consultants may need in the production of the final document. As a matter of efficiency, it is suggested that a meeting be held to discuss the issues raised in this letter and to provide any clarification you may need regarding the technical comments. Steven Siegel, of my staff is prepared to set up such a meeting.

The timely construction and operation of the Alturas Intertie Project is critical to effectively meeting our customers service needs. Should there be any issues of which you are aware, or that would prevent Sierra Pacific from providing this service, please do not hesitate to contact us immediately. Thank you for your time and consideration of these comments.

Sincerely,

Jack L. Byrom

Jack L. Byrom
Vice President, Utility Business Services

attachment

Technical Comments, Corrections and Suggested Changes to the Alturas Intertie Project Draft EIR/S

Project Description and Alternatives

page B-4, Table B-2, Sub-Section Transmission Line Facilities, fourth bullet, third dash: Single-pole structures are indicated from the BPA line to the Alturas Substation. This is incorrect as they will be two-pole double circuit structures, the drawings having been previously supplied to Aspen. A. 1-17

page B-17 paragraph 3, line 7. Please insert: "Secondary station service will be supplied from a local distribution line." A. 1-18

page B-29 paragraph 1 lines 2 and 3 It is anticipated that the substation work will continue through late December 1996, not October as stated. A. 1-19

page B-61 paragraph 2, line 1. Sierra Pacific disagrees with the statement that no net environmental advantage is expected from siting the proposed project adjacent to the proposed Tuscarora Natural Gas Pipeline project. Joint use of access, equipment yards and other facilities is still possible and is being planned. An additional benefit of shared environmental data was also realized. A. 1-20

Biological Resources

Page C.3-10, Table C.3-2. The header for the column "Typical Representative Wildlife Species" is followed by a superscript numeral 1, but there is no corresponding footnote. This column contains numerous species which are neither typical or representative. In particular, western yellow-billed cuckoo should be dropped from this table and from the entire DEIR/S. This species is not found in the project vicinity; it is certainly not typical or representative of the Modoc Plateau or the Basin and Range. A. 1-21

Change Vesper's sparrow to vesper sparrow. A. 1-22

page C.3-15 paragraph 2, lines 6 and 7 If CEQA does not consider CNPS lists 3 and 4 for protection, why have they been included in the document for discussion? Please remove discussions regarding CNPS list 3 and 4 species, or justify why, under CEQA regulation, they have been included. A. 1-23

Page C.3-15, paragraph 4, line 1. The text refers to the "large number of special status species" in the Project vicinity. This statement is incorrect and taints the CEQA/NEPA process, because it is prejudicial to the Project. In fact, the Project area contains very few special status species, compared to most any comparable 165-mile-long transect across any other part of California and associated parts of Nevada. As the DEIR/S indicates, no A. 1-24

federally-listed species and only one California-listed threatened species would be directly impacted by the Project.

We recommend that the paragraph be changed to note that very low numbers of special status species are present, because of the relatively undeveloped nature of the region and because the habitat types are largely widely distributed.

A. 1-24

Page C.3-16 to C.3-23, Table C.3-3 The table does not correctly reflect current California Native Plant Society (Skinner and Pavlik, February 1994) listings and should be corrected.

The table and the text confound the public review process by including a substantial number of plant species which should not be included because their level of rarity or risk does not warrant consideration as sensitive species. Nearly half of the species do not meet CEQA or NEPA criteria for inclusion. This inflation in the number of sensitive plant species potentially occurring is misleading and incorrectly suggests a more environmentally detrimental proposed Project than is the case.

The following plant species are in the table, but are not on any lists of sensitive species or even on watch lists. Nor does the text provide adequate justification for their inclusion. These plants should be dropped from the table and the DEIR/S:

A. 1-25

Alisma gramineum
Astragalus agrestis
Astragalus lentiginousus var. *chartaceus*
Atriplex gardneri
Carex atherodes
Cleomella hillmanii
Downingia laeta
Eriogonum collinum
Lomantium foeniculaceum var. *macdougalii*
Lupinus uncialis
Penstemon neotericus
Polygonum polygaloides
Psoralidium lanceolatum
Sphaeralcea grossulariifolia
Stanleya viridiflora
Thelypodium mileflorum
Triteleia grandiflora ssp. *howellii*
Tripterocalyx crux-maltae

The table and the DEIR/S text include plant species on the CNPS lists 3 and 4. According to the DEIR/S, these lists are not of sensitive species and need not be considered in the DEIR/S. Nor does CEQA or NEPA provide justification for inclusion of these species.

The following CNPS list 3 and 4 plants should be dropped from the table and consideration in the DEIR/S:

Antennaria flagellaris
Astragalus inversus
Camissonia boothii
C. minor
C. tanacetifolia ssp. *quadriperforata*
Chenopodium simplex
Collomia tracyi
Cordyalis caseana ssp. *caseana*
Cryptantha scoparia
Delphinium stachydeum
Dimeresia howellii
Erigeron elegantulus
Gentina affinis
Hackelia cusickii
Iliamna bakeri
Juncus hemiendytus
Lomatium ravenii
Penstemon cinereus
P. cinicola
P. heterodoxus var. *shastensis*
Psilocarphus elatior
Scutellaria holmegrentorum
Senecio hydrophiloides
Spartina gracilis
Trifolium lemmonii

A. 1-25

Among the corrections that need to be made are the following:

Arnica soria is List 2
Astragalus pulsiferae var. *suksdorfii* is List 1B
Eriogonum nutans var. *nutans* is now *Eriogonum nutans*
Ivesia baileyi is now List 2
Mimulus pygmaeus is now List 1B
Oryctes nevadensis is now List 1B

We recommend that this table be deleted from the Biological Resources section of the EIR/S and a corrected table remain in the Biological Assessment in Volume II.

Page C.3-25, paragraph 4, last line. Change "Canadian" goose to Canada goose.

A. 1-26

Page C.3-26, Table C.3-4. This table contains incorrect information on the legal status of species, listing them as more endangered than is the case, as follows:

A. 1-27

- Mountain quail is not a C2 species and should be deleted from the list and further consideration in the DEIR/S
- The interior race of the western snowy plover is not a C2 species.
- Long-billed curlew is not a C2 species.
- The western subspecies of the loggerhead shrike is not a C2 species.
- Great Basin spadefoot toad is not on the CSC list and should be deleted from the list and from consideration in the DEIR/S.
- Pronghorn is not a C2 species and should not be treated as a sensitive species in the DEIR/S; it is a harvested species.
- American badger is not on the CSC list and should be deleted from the list and further consideration in the DEIR/S.

The table provides incorrect information on the status of the following species.

- Willow flycatcher is a C2 species.
- Western burrowing owl is a C2 species.
- Spotted frog is a C1 species.

The table is misleading in its presentation of the California species. CDFG provides qualifiers on some of these species as to when and where they are considered special status. These qualifiers have not been included in the table. These omissions suggest that the animals are considered more sensitive than is the case. The table should include qualifiers for the following species: A. 1-27

Species	Qualifier
American White Pelican	Nesting colony
Double-crested Cormorant	Rookery
Western Least Bittern	Nesting
Swainson's Hawk	Nesting
Ferruginous Hawk	Wintering
Golden Eagle	Nesting and wintering
Bald Eagle	Nesting and wintering
Northern Harrier	Nesting
Prairie Falcon	Nesting
Greater Sandhill Crane	Breeding and wintering
Long-billed Curlew	Breeding
Black Tern	Nesting colony
Western Yellow-billed Cuckoo	Nesting
Burrowing Owl	Burrow sites
Great Gray Owl	Nesting
Long-eared Owl	Nesting
Short-eared Owl	Nesting
Willow Flycatcher	Nesting
Bank Swallow	Nesting colony
Yellow Warbler	Nesting

The new correct scientific name for the burrowing owl is *Speotyto cunicularia.* A. 1-27

Page C.3-36 paragraph 3 line 7- nests do not perch, birds do. The fact that the Swainson's Hawks were utilizing power facilities to nest should be noted as a compatible relationship with the proposed project and as a future potential benefit for raptors. A. 1-28

Page C.3-39, paragraph 3. We recommend that western yellow-billed cuckoo be deleted from the entire EIR/S, because the bird is not found in the Project area. A. 1-29

Page C.3-47, last paragraph. While all "waters of the U.S." are jurisdictional under Section 404, the Corps does not exercise its regulatory powers of "all adverse impacts to waters of the U.S." Some impacts are considered exempt or otherwise too minor to be considered. The text should be modified to correctly describe Section 404 processes. A. 1-30

Page C.3-48, first paragraph. Acreage conditions for nationwide permits (NWP) vary; some 10 acres, some more, and some less. The text should be modified to correctly describe NWP processes, especially NWPs 12, 26, and 33. A. 1-31

Page C.3-49. The "Definition and Use of Significance Criteria" ignores the level of impact. Not all adverse impacts are significant. The entire subsequent analysis in the *Biological Resources* section of the DEIR/S confuses "may affect" with "significant effect." For example, "removal or disturbance of a special status species or its habitat" is not necessarily significant; the effect has to be *substantial* in order for it to be significant. The determination of substantiality needs to be made for each individual impact. A. 1-32

We recommend that Section C.3.2.1.1 *Significance Criteria* simply state that CEQA criteria for determining significance were used per the *CEQA Guidelines*, because the CEQA criteria are stricter than NEPA's. That is, effects which would be considered significant under NEPA would also be considered significant under CEQA; the converse is not always the case. CEQA criteria mandate that an effect must be determined to be substantial in order for it to be considered significant.

Page C.3-50, paragraph 2. The five bulleted examples of significant impacts are too vague to meet CEQA/NEPA standards of significance. For example, "disturb a special species habitat" can be so minor as to have no significant effect. A. 1-33

Page C.3-50, last paragraph. As with the comment above, "disturbance or habitat removal within a sage grouse lek" is not automatically significant under CEQA/NEPA. The disturbance has to be substantial. For example, if someone walked across the lek in the non-breeding season, when no birds were present, this activity would be considered a disturbance of the habitat, but would not likely qualify as significant if no birds were affected and the habitat remained substantially the same as it was before the disturbance. A. 1-34

The analysis here and elsewhere in the DEIR/S confuses *sensitivity* with *significance*. A resource may be *sensitive*, but the impact on the resource is considered *significant* only if *substantial*. A. 1-34

Page C.3-52, Table C.3-8. This table purports to provide "significance criteria," but does not. No guidelines, thresholds, or measures are provided that would aid the analysis in determining significance. Rather, the table simply lists potentially sensitive resources. An example of a significance criterion would be an adverse effect on a mule deer herd such that population numbers are measurably reduced. Thus, loss of mule deer winter range habitat that would have no population effect would be considered insignificant; loss of habitat which would likely result in a population decline would be considered significant. A. 1-35

Page C.3-52, paragraph 1. The DEIR/S provides a list of 10 plant species "that will be avoided." What does "avoided" mean? Have these plants been detected in the Project area and has the alignment been modified to avoid them? The text should state which special status plants were detected in the Project area and which additional plant species were not detected in the Project area but are judged to be present based on habitat, associated plant species, and review of past records. A. 1-36

Page C.3-53 Table C.3-9 How were the acreages determined for this table? Were they estimated? It is assumed that actual calculations of disturbance for reclamation and compensation will be derived from actual measurements of disturbance. If the numbers have been estimated the text should state that they were. A. 1-37

page C.3-53 Table C.3-9 An additional column should be added to this table which provides the significance of these impacts based upon a substantial loss. Sierra Pacific disagrees that a substantial impact to Big Sagebrush or Juniper Woodlands would occur or should be compensated for, as a result of losses generated by the proposed project. As such, this table should not be used in its entirety to determine compensation figures. A. 1-38

page C.3-55 footnote- A more accurate description of the mitigation for crane pads cut into side-hills would be to recontour and revegetate the sites instead of backfilling and compacting. A. 1-39

Page C.3-56, paragraph 3. The DEIR/S defines the duration of impacts as temporary (construction period), short-term (3-5 years), long-term (≤20 years), and permanent (>20 years). An explanation is needed for assignment of these durations. These durations do not clearly correspond to likely restoration and recovery periods and are, thus, of limited use. A. 1-40

In particular, a 20-year threshold for permanent impacts removes the necessity of many on-site restoration efforts. The 20-year threshold allows the Project to, in effect, "buy" mitigation with off-site measures rather than requiring mitigation where the impacts occur. It is the clear policy of CDFG and USFWS that on-site mitigation is preferred over off-site compensation.

We suggest that the following durations are more appropriate to this project, because they relate to actual recovery processes. And because they correspond to recovery durations, these provide the basis of a successful recovery effort and for the assignment of mitigation requirements. A. 1-40

Impact	Recovery Period	Explanation/Application
Immediate	Construction period	Effects of impact would be for the period of construction only, without additional residual impacts (e.g., noise from construction machinery).
Temporary	One growing season (>1 year)	Certain annual plants, particularly grasses, can be reestablished the growing season after ground disturbing impacts.
Short-term	1-5 years	Period for successful restoration for herbaceous vegetation and most small shrubs.
Medium-term	5-10 years	Period for successful restoration for most large shrubs and some small trees such as willows.
Long-term	10-50 years	Period for successful restoration for most tree species.
Permanent	>50 years	Restoration in a reasonable recovery period is not anticipated.

We recommend that the EIR/S consider the duration of the effects of impacts in the analysis. The following text in the *Biological Resources* section of the DEIR/S does not. The DEIR/S simply classifies impacts as being either "temporary" or "permanent" without definition, explanation, or analysis.

page C.3-57 paragraph 6 -Compensation for impacts to the CDFG WCAs should be provided to CDFG only as long as they own and/or manage the land. If they sell or exchange the land, compensation moneys should be returned for renegotiation with Sierra Pacific. (Sierra Pacific is aware that CDFG is planning to exchange land with the BLM for the Doyle WCA). A similar situation exists for the compensation of impacts occurring on lands managed by the Bureau of Land Management or the U.S. Forest Service. Impacts occurring on federally-managed lands must have the mitigation applied back to those agencies, who manage the lands in the public trust. It is unreasonable to assume or require, that the State of California would be compensated for impacts that occur on lands that are managed by federal agencies for the people of the United States. Mitigation of A. 1-41

impacts that occur to wildlife habitat located on federally managed lands will be developed with those federal agencies. A. 1-41

page C.3-68 Table C.3-10 In this table and throughout the Biological Resources section, the period of compensation is designated at 50 years. Why? If on-site compensation is provided, the compensation begins much sooner. If off site compensation is provided, the benefit is provided immediately. There should be no multiplier for the period of compensation. A. 1-42

Page C.3-61, paragraph 3. The citation to Brown et al. 1993 in the *Wildlife Society Bulletin* is incorrect. No such article appeared in the 1993 issues of the *Wildlife Society Bulletin*. Provide the correct citation, including page numbers. A. 1-43

Page C.3-61, last paragraph. We recommend that this paragraph be deleted, because the claims made in it are unsubstantiated and do not relate to the project. The "scientific literature" does not make determinations of CEQA/NEPA significance as asserted in this paragraph. A bird collision with a powerline is not necessarily significant if it affects an endangered species or has a cumulative effect. The question of significance is one of degree. For example, a bald eagle may brush against a powerline, but not be harmed. In that case, the collision would not be considered significant, even if the species is endangered. A. 1-44

There are many situations in which "any man-induced mortality" will not "have catastrophic impacts on populations" of endangered species. Even endangered species may be able to sustain low levels of anthropogenic impacts without any population effects, let alone catastrophic ones, as long as the effects are within certain existing natural ambient rates of mortality for that population. For example, an old and weakened bald eagle may die from a collision with a powerline, but if the individual was not reproductively active, this source of mortality would have no additional effect on population reproductive rates. The DEIR/S confuses "may affect" with "may significantly affect."

Page C.3-63, paragraph 2, sentence 2. The notion that "any impact on sensitive species...is considered significant" is incorrect. Impacts can be minor and therefore not significant. The critical test is whether the impact causes rates of mortality greater than ambient mortality rates and then whether these have a substantial impact on population numbers. A. 1-45

Page C.3-64, paragraph 1, sentence 1. The vulnerability of peregrine falcons to collisions with powerlines needs to be substantiated with information from the literature. A relatively large amount of research has been conducted on this species' vulnerability compared to some other raptor species. Although peregrine falcons are well known for their swift flight, it does not necessarily follow that they are inattentive and frequently collide with powerlines. A. 1-46

Page C.3-65, paragraph 3. The figures cited in the text do not provide an estimate of growth envelopes. This information should be provided if cited in the text.

We recommend that removal of trees >4 inches DBH (diameter at breast height) be the criterion for significance in Juniper Woodland, because these larger trees take considerable periods of time to mature and provide valuable wildlife habitat. This significance threshold gives the Project an incentive to avoid impacting trees. If any impact to Juniper Woodland is considered significant, then the Project has no incentive to minimize impacts by avoiding trees. A. 1-47

Page C.3-65, paragraph 4. We recommend that removal of trees >4 inches DBH (diameter at breast height) be the criterion for significance in Yellow Pine Forest, because these larger trees take considerable periods of time to mature and provide valuable wildlife habitat. This significance threshold gives the Project an incentive to avoid impacting trees. If any impact to Yellow Pine Forest is considered significant, then the Project has no incentive to minimize impacts by avoiding trees. A. 1-48

Page C.3-65, last paragraph. No explanation is given for considering temporary impacts to Low Sagebrush Scrub a significant impact. This is an abundant habitat type and does not support substantial numbers of special status species. In addition, much of this habitat that would be affected by the Project is already degraded. We recommend that temporary impacts to this habitat not be considered significant. A. 1-49

Page C.3-66, paragraph 3, line 1. The text states that impacts "will be approximately 3 acres." The conditional tense (i.e., "would") should be used here and throughout the subsequent parts of the *Biological Resources* section of the DEIR/S. The conditional tense is appropriate in describing potential impacts because this is a *proposed* project and because the actual extent of impacts may be different than anticipated. A. 1-50

Page C.3-66, last paragraph. No explanation is given for considering temporary impacts to the Sagebrush/Bitterbrush Community a significant impact. This is the most abundant habitat type in the Project vicinity and no special status plant species are associated with it. In addition, most of this habitat that would be affected by the Project is already degraded by grazing and other impacts. We recommend that temporary impacts to this habitat not be considered significant. A. 1-51

Page C.3-67, paragraph 2. No explanation is given for considering temporary impacts to Big Sagebrush Scrub a significant impact. This community is widespread throughout the Project vicinity, it extends throughout the Great Basin, no special status plant species are associated with it; it is composed of a high proportion of non-native plant species; and it is already degraded by grazing and other impacts. We recommend that temporary impacts to this habitat not be considered significant. A. 1-52

Page C.3-67, last paragraph. No explanation is given for considering temporary impacts to Chenopod Scrub a significant impact. This is an abundant habitat type and does not A. 1-53

support special status plant species. We recommend that temporary impacts to this habitat not be considered significant. A. 1-53

Page C.3-68, Table C.3-10. This table lists silver sagebrush scrub among the affected communities, although silver sage scrub is not discussed in the DEIR/S text. Likewise, the table adds *Psoralidium lanceolatum* to the list of special status species, but does not consider this plant in the text. The table should be made consistent with the text. A. 1-54

How were the various acreages used in the table derived and calculated? For example, the table records a temporary loss of 8.52 acres of *Lomatium hendersonii*. Does this mean that this plant species was found throughout the 8.52 acres or that the total coverage of stands of *Lomatium hendersonii* temporarily impacted by the Project is 8.52 acres?

Page C.3-69, paragraph 2. We recommend that the EIR/S explicitly acknowledge that actual mitigation compensation for impacts be based on actual as-built impacts incurred. Although this is implicit in the document, making it explicit provides an additional incentive to the Project to minimize impacts. The Project would then be penalized for exceeding anticipated impacts, but would rewarded in effect for avoiding impacts by having the mitigation requirements reduced. A. 1-55

The text records 149 acres to permanent loss of plant community habitat and cites Table C.3-10. This table, however, records a total of 65.49 acres. These discrepancies need to be reconciled.

Page C.3-70, paragraph 5. We recommend a threshold of 3-inch, rather than 6-inch, ruts as more adequate for protecting this sensitive habitat. A. 1-56

Page C.3-71, last sentence. The DEIR/S concludes "no mitigation is proposed for impacts to Cusick's stickseed," yet Table C.3-10 prescribes 1.92 acres of compensation. The table should be brought into conformance with the text by deleting this species and its mitigation requirements. The DEIR/S Biological Assessment (page E.1-30) also finds that the plant does not qualify as a CEQA species. A. 1-57

Page C.3-72, paragraph 1. The DEIR/S classifies impacts to *Scutellaria holmgreniorum* as Class II. This is not warranted. *Scutellaria holmgreniorum* is a Federal Category 3C species. Such species are, according to the USFWS (Federal Register, 11/15/94), "taxa that have proven to be more abundant or widespread than previously believed and/or those that are not subject to any identifiable threat." Further, the USFWS warns "a common misinterpretation of Category 3C is that a status review indicates those species have special sensitivity or vulnerability to extinction." In fact, the Category 3C designation indicates that the USFWS has completed a review of the plant's status and found that listing is not warranted. This is not a plant for which scientific information is lacking or for which the information has not been reviewed. Rather, the scientific conclusion of the USFWS is that *Scutellaria holmgreniorum* is not sensitive. Likewise, *Scutellaria* A. 1-58

holmgreniorum was on the CNPS List 1B of endangered plants. Upon further review, the CNPS (Skinner and Pavlik 1994) de-listed the plant to List 3, a "review list."

We recommend that impacts to *Scutellaria holmgreniorum* be considered a Class III impact, adverse but not significant. No specific mitigation is warranted. In addition, the DEIR/S already prescribes mitigation for impacts to its volcanic vertisol habitat. A. 1-58

Page C.3-72, paragraph 4. The previous text provides commentary on six plant species, concluding that only four of these require mitigation. Yet Table C.3-10 lists nine plant species with acreages requiring mitigation, including the two dropped from consideration in the text. The three additional plant species and their status are:

Camissonia boothii ssp. *alyssoides*	CNPS 4
Camissonia minor	CNPS 4
Psoralidium lanceolatum	no listing

A. 1-59

We recommend that these plants also be deleted from the table, because their status does not warrant inclusion. These are widespread and common species as reflected in being on CNPS list 4, a watch list, or have no listing at all. The Biological Assessment (page E.1-23) for the DEIR/S also finds that *Camissonia boothii* ssp. *alyssoides* does not qualify as a CEQA species.

Page C.3-75, paragraph 3, next to last line. The text gives a total compensation figure of 43 acres and references Table C.3-10, which provides a sum of 47.86 acres. The previous page in the DEIR/S gives acreages for individual plant communities whose sum is 47.7 acres. These discrepancies need to be reconciled. A. 1-60

Page C.3-76, paragraph 1. Of the five plant species listed here, the DEIR/S had already deleted *Lomantium ravenii* from consideration on page C.3-72 and on page E.1-33 of the Biological Assessment.

Three of the other species are on CNPS list 4 and therefore do not warrant consideration either according to the criterion already established in the DEIR/S which eliminated List 4 species from consideration. The fifth remaining plant species, *Psoralidium lanceolatum*, is not found on any lists and is not a sensitive species. We recommend that all the entire "OT Impacts" column for special status species on Table C.3-10 be deleted. A. 1-61

It would also be appropriate for the text to discuss impacts to the individual plant species under Impact 4. Such a discussion (albeit incomplete) was provided for each of the plant species under Impact 2.

Page C.3-76, last line. The text gives a total compensation figure of 4 acres and references Table C.3-10, which provides a sum of 4.93 acres. This discrepancy needs to be reconciled. A. 1-62

page C.3-78 table 3-11 Length and Location of New and Upgraded Spur Access Roads... It should be noted that updated information regarding this table has been supplied in an earlier correspondence. A. 1-63

Page C.3-79, paragraph 3, last sentence. The DEIR/S proposes "...any roads that are currently open...shall be closed to protect sensitive natural resources." This is not a valid mitigation and should be dropped, because the Project is not responsible for *existing* conditions. A. 1-64

page C.3-81 paragraph 4 lines 3 and 4. Existing populations of noxious weeds were not caused by the proposed project and thus the proposed project should not be responsible for their identification or eradication. It may be possible to substitute existing noxious weed eradication for other suggested reclamation measures. A. 1-65

page C.3-82 paragraph 3. Sierra Pacific disagrees with the anticipated amount of lost Mule Deer habitat due to access road use and construction. Rarely will a full 15 foot-wide swath be eliminated as a result of access road use or construction. Repeated driving over the same road could produce 2, three-foot wide tracks that will be compacted and void of vegetation. This differs greatly with the assumption of 15 feet, and even more when compounded by the multiplier added for compensation. The calculations should be made after the disturbance is generated (after construction) or for documentation sake, 6 rather than 15 feet, should be used for the total width of disturbance. A. 1-66

Page C.3-83. Table C.3-12 is difficult to correlate with the impact analysis in the text, because impacts to a given species can appear in more than one segment. We recommend that individual tables be provided for each species as they are presented in the text (e.g., mule deer, pronghorn, etc.) and then present Table C.3-12.

Table C.3-12 prescribes zones of indirect impact which are excessive and unsubstantiated. We recommend the following zones of impact: A. 1-67

Resource	DEIR/S Prescribed Zone of Impact	LSA Recommended Zone of Impact
Pronghorn kidding areas	0.5 mile	0.25 mile
Pronghorn winter range	0.5 mile	0.25 mile
Sandhill crane nest	0.5 mile	0.25 mile
Prairie falcon eyrie	0.5 to 1.0 mile	0.5 mile
Sage grouse lek	0.5 to 2.0 miles	0.5 mile
Sage grouse brood habitat	1.0 mile	0.25 mile
Big-eared bat roost	1.0 mile	0.1 mile
Mule deer migration area	0.5 to 2.0 miles	0.1 mile
Mule deer winter range	0.5 to 1.5 miles	0.1 mile
Burrowing owl nest	2.0 mile	0.1 mile
Long-eared owl	1.5 mile	0.1 mile

A. 1-67

How were the distributions of the various wildlife species determined? Were these determinations based on direct observations of the species in the field, potential suitable habitat, published range maps, etc.? Was quality of habitat taken into consideration? That is, were distinctions made between optimal habitat and degraded habitat?

How were the acreages of impact calculated? Did the analysis distinguish impacts among the various construction activities such as blading, erecting structures, and stringing?

Page C.3-85, paragraph 1. Mitigation should not be required for temporary impacts to mule deer habitat, because these impacts are not significant for the following reasons:

- Impacts would be avoided in many cases because of the seasonal use by deer in their range. For example, if the Project is built in the summer, there would be no temporary impacts to deer winter range.
- Where construction activities coincide with the seasonal use by deer in a given range area, impacts may still be avoided by temporal separation. Construction activity is limited to the daylight hours, while a substantial portion of the mule deer activity is in the crepuscular and night hours.
- Where construction activities coincide with the seasonal and temporal use by deer in a given range area, impacts would be minor and below the level of significance. This is because the construction effort is spread over a linear configuration and because of the dispersed behavior of mule deer, wandering over a considerable home range.

A. 1-68

Page C.3-85, paragraph 1, last sentence. The calculations indicate 23.9 acres of temporary habitat use, yet Table C.3-12 accounts for only 16.7 acres (25.3 acres total, minus 8.6 acres for overlap). The correct mitigation amount is thus 15.0 acres, not 21.5 acres. A. 1-69

Page C.3-86, paragraph 5. A more appropriate mitigation for temporary impacts to pronghorn kidding habitat is to restrict construction activities from within a quarter-mile of occupied habitat during the kidding season. Likewise, impacts to winter range would be avoided by modification of the construction schedule. Therefore, no mitigation is required for temporary impacts. A. 1-70

Page C.3-87, last sentence. This sentence posits 4.26 acres of temporary disturbance to pronghorn habitat; Table C.3-12 posits a total of 6.36 acres. This inconsistency should be reconciled. A. 1-71

Page C.3-87. The text records 0.0059 acre of permanent loss of sage grouse habitat from structures and 7 acres from emergency access routes, for a total of 7.0059 acres; the total of permanent loss in Table C.3-12 is .0011 acres. This inconsistency should be reconciled. A. 1-72

Page C.3-87, paragraph 3, line 1. Flagging lek locations is inadvisable during the sage grouse breeding season, because the flags may attract unauthorized people. Flagging lek locations in other seasons is unnecessary, because no resource is there to be protected. We recommend that the Project flag areas where construction activities are allowed and assume that all other areas are off-limits. A. 1-73

Page C.3-88, paragraph 2. The text records 4.5 acres of temporary loss of sage grouse habitat; the total of temporary loss in Table C.3-12 is 1.7 acres. This inconsistency should be reconciled. A. 1-74

As with mule deer and pronghorn, if seasonal use of habitat by sage grouse does not coincide with the construction period, no impacts would occur and no mitigation would be required.

Page C.3-89, paragraph 3, sentence 2. The DEIR/S asserts that vegetation crushed by overland travel in big game areas would be a significant impact due to the temporary loss of available forage, but does not substantiate this judgment. Due to the linear nature of transmission line construction activities, the temporary loss of forage from crushing would be an insignificant proportion of the available forage in any one area and therefore a discernible but not significant impact. The analysis in the DEIR/S confuses "may affect" with "significant effect." A. 1-75

Page C.3-90, paragraph 2, sentence 2. The 50-meter minimum buffer around nest sites in the non-breeding season is unnecessary. We recommend no buffers for unoccupied nest areas. A. 1-76

Page C.3-90, paragraphs 3 and 4. The acreages in the text for permanent and temporary loss of Swainson's hawk habitat is not consistent with Table C.3-12. A. 1-77

page C.3-90 paragraph 3. Sierra Pacific disagrees with the calculation of permanent loss to Swainson's Hawk foraging habitat. The equation must add the benefit that will be realized by the birds' use of the powerline. The proposed project will allow for the expansion of it's territory by providing a safe nesting location and hunting roosting and resting perches. The document should, where feasible as here, identify both the detriments and benefits of the proposed project to wildlife. A. 1-78

Page C.3-90 Mitigation Measure B-14- A flagging strategy is being developed whereby areas of opportunity or zones of travel will be flagged instead of flagging the areas to be avoided. There is such a variety of avoidance areas, that confusion could arise over where construction personnel could travel. It will be clearly understood that travel can only occur within the areas that are flagged. Maps will also be generated with the zones of travel on them. In this way the will be no attraction to a sensitively flagged area (such as a cultural resource site or raptor nest).Please change the wording of this mitigation measure to reflect the idea that flagging will be provided to avoid sensitive resources rather than actually flagging the resources. A. 1-79

Page C.3-93, paragraph 3, bullet 1. This expands the sage grouse lekking season beyond natural limits. We recommend a period of 3/1 to 5/1. A. 1-80

Page C.3-93, paragraph 3, bullet 2. Rabbits are rarely hit by moving vehicles and it is expected that Pygmy rabbits will avoid moving vehicles. We recommend that overland travel in pygmy rabbit habitat not be prohibited. A. 1-81

Page C.3-93, paragraph 3, bullet 3. A 10 mph speed limit is unduly restrictive and difficult to enforce. A 25 mph speed limit is recommended on unpaved access roads and off-road areas, where sensitive wildlife resources occur.

It should be noted that in many areas terrain may not allow travel over 10 miles per hour, but a speed limitation of 10 mph will greatly reduce construction efficiency and may result in longer periods of potential wildlife disturbance. A shortened construction period would reduce potential impacts to wildlife. It is proposed that a speed limit of 25 miles per hour be utilized except where fugitive dust conditions or sensitive wildlife are present. The agency monitors that will be present during construction can provide direction as to when those conditions prevail. A. 1-82

Page C.3-93, paragraph 3, bullet 5. This provision should be strengthened. Organic waste should be stored in enclosed receptacles, removed from the Project site daily, and deposited in a suitable waste disposal facility. A. 1-83

page C.3-94 paragraph 3 mitigation item B-18. This mitigation item should be modified to account for the exclusion of new access roads that will be needed for maintenance access and will not be reclaimed when construction is complete. A. 1-84

page C.3-94 paragraph 5 second bullet. It should be noted that there are methods of providing raptor electrocution protection other than by providing wider clearances. Sierra Pacific has developed perching deterrents which eliminate hazardous location within substations and on powerline structures, Due to this success, Sierra Pacific would prefer to utilize the deterrents to discourage perching and roosting. A. 1-85

page C.3-95 paragraph 1, bullet 1. The protective wildlife boots that are placed on transformer bushings are only used on the lower (distribution) voltage transformers and do not provide the necessary insulative protection for birds at the higher transmission voltages. A. 1-86

page C.3-95 paragraph 4 line 6. The bird flight diverters Sierra Pacific is familiar with and intends to utilize are approximately 30 inches in length. The same spacing would be utilized. A. 1-87

page C.3-98 note: The calculations (for off site compensation mitigation item B-20) all appear to have been rounded, resulting in additional acreage for mitigation, ie., sandhill cranes : 348 instead of 338. This could result in an overcompensation and increased mitigation costs. It is requested that the numbers not be rounded off for calculation of the final compensation amount. A. 1-88

page C.3-98 Mitigation Measure B-22 Use of Perch Preventers to Protect Sage Grouse Brood Areas

The Draft EIR/S requires mitigation for impacts to sage grouse caused by increased predation from raptors using the transmission structures as hunting perches. The mitigation required is the installation of "perch guards" (a device that will inhibit the use of the transmission structures as perches) on all structures within an 8- mile radius of leks or sage grouse strutting grounds. Based on all available information, we respectfully request that a more appropriate mitigation requirement would be for a 2-mile radius around such grounds. A. 1-89

According to the Nevada Department of Wildlife (Elko Regional Office), which has extensive experience with sage grouse and impacts to leks and brood habitat, the normal range of area traveled from the lek is 2 miles with very large leks in rare instances having a maximum range of up to 5 miles. The impact of the proposed project is further lessened since perches already exist in these areas and since there are already various obstacles to travel in various directions such as topography, discontinuous habitat and other developments which would inhibit the sage grouse from using that area.

Geology, Soils and Paleontology

page C.6-33 mitigation item G1

There is no definition of unique geologic formations in the text, yet in mitigation measure G-1 they "shall be avoided." A. 1-90

It is suggested that a definition for "unique geologic formation" be provided and that the statement be rewritten to read as follows:

Ground disturbance should be kept to a minimum where practical. Where recontouring of soil areas is necessary, surface restoration shall occur as required by the lead agencies and the responsible land management or public agency. Cut slopes in bedrock should not require recontouring but must be left in a stable configuration. Any unique geological formations, identified during the geotechnical/engineering geological investigation, shall be avoided to the maximum extent feasible. The construction operation and maintenance plan shall address avoidance of unique geologic formations, if encountered, and the restoration proposed for areas where recontouring will be required. A. 1-90

page C.6-37 mitigation item G-9 There are no known, significant metallic mineral deposits along the alignment. Mineral resources are generally limited to small aggregate borrow and pozzolan operations. The impact to these locally extensive deposits will be minimal. There is no statutory or regulatory requirement that structure or access road sites be reviewed by CDMG or NBMG, and we request that this reference be deleted.

It is suggested that this measure be rewritten to read as follows: A. 1-91

Structures will be sited to avoid existing and proposed mineral and aggregate resources where practical. In locally extensive deposits, such as gravel pits or pozzolan deposits, avoidance may not always be practical. In such cases, the impact would be small relative to the areal extent of the resource. Claim owners should be justly compensated for any substantiated losses.

page C.6-38 mitigation item G-10 In the event of a volcanic ash fall, the problem will be of regional extent. A project specific ash fallout plan would not be a useful excercise for such a regional plan . That is the responsibility of Bureau of Emergency Management. An Emergency Preparedness Plan would seem very unnecessary for an ash fall hazard on this project. A. 1-92

page C.6-42 mitigation item G-12 Applicant is not under any state or federal requirement to arbitrate compensation disputes for loss of agricultural land production. It is suggested mitigation measure G-12 be rewritten as follows:

Removal of private agricultural land from production will be negotiated between the applicant and landowner. The applicant shall compensate the landowner for any loss of agricultural land. If a dispute arises regarding the value of the loss, the landowner has recourse in court under state law for a determination of lost value. The applicant and landowner may agree as part of the negotiation process to participate in arbitration mediation or use of appraisers to determine the loss. A. 1-93

page C.6-43 mitigation item G-13 The performance standard should be specified in the mitigation measure: A. 1-94

Foundation and tower structures should be protected from corrosion in accordance with industry standards, the geotechnical/engineering geologic report and standard practice for transmission line structures. A. 1-94

page C.6-43 mitigation item G-15 Paleontologic Data Inventory Mitigation

Much of the alignment lies in igneous and metamorphic rock with no fossil bearing potential or alluvial slopes with minimal fossil-bearing potential. Under rare conditions, geologically significant fossils could be preserved in lacustrine/playa deposits along the alignment. The chances of encountering such fossils with only localized, minimal disturbance operations would seem remote. There are no known paleontologic sites within the proposed and alternate project corridors. Given the extremely low probability that significant fossils will be affected by the project, we respectfully suggest that this measure be modified as follows: A. 1-95

Prior to construction, project field supervisors, field construction personnel, and construction equipment operators will receive training on fossil-bearing strata and fossil features. Any fossils located in the field by the project applicant will be immediately reported to the appropriate mitigation monitor(s) for the project.

Page C.6-54 paragraph 4, line 1. The mill Site is an 8-acre site not an acre site, as stated. A. 1-96

Hydrology

Page C.7-3 Table C.7-1: Perennial Stream Crossing - Long Valley Creek is not shown. The proposed alignment crosses Long Valley Creek at milepost 150.8 just north of angle point BS01. Please note that alternate alignment WCFG does not cross Long Valley Creek. A. 1-97

Page C.7-3, Paragraph 3: This section on Ground Water should provide a table listing all springs and wells within one-quarter mile of the ROW to characterize the magnitude of potential impacts associated with blasting. The table would serve as the basis for identifying locations to study in the Blasting Plan (Mitigation Measure G-8) and in Mitigation Measure H-8 (page C.7-15). A. 1-98

Page C.7-4 Table C.7-2: 100 Year Floodplains Crossed by Proposed Project - Line 6 is incorrect. The point where the Q alignment crosses Dry Valley is actually in Washoe County, Nevada, not Lassen County. This is near Milepost 129, not 122. Design for this section has not been completed yet so it is unknown if there will be any structures in the floodplain. A. 1-99

Page C.7-9, Last Bullet: This significance criteria should be modified to reflect consistency with CEQA and the Biology significance criteria (page C.3-50) by describing the impact as a *"long term* substantial *increase in the sediment load..."*

Page C.7-12, Mitigation Measure H-4: The last portion of this mitigation measure should be changed to read - "Where floodplains cannot be avoided, structures shall be designed in accordance with the recommendations established in the geotechnical engineering report." Review should not be a requirement. The H-Frame type structure used on the line will not alter the floodplain characteristics, just as existing single pole structures in these areas have no effect. As a utility, Sierra is exempt from the Engineer's Licensing Act.

Pages C. 7-12 and 7-13 Mitigation measure H-4 states that foundation designs shall be designed based on a site specific analysis reviewed and approved by CPUC, BLM, and affected agencies. Delete this requirement. Utility design is done in accordance with applicable codes and standards and in accordance with the agency issuing the crossing permit (Corps of Engineers, etc)

Page C.7-13, Mitigation Measure H-5: The one-quarter mile criteria for refueling is excessive. The FERC Wetland and Waterbody Construction and Mitigation Measures Guidelines specify a minimum distance of 100 feet from waterbodies for refueling activities. This mitigation measure should be changed to 100 feet.

Land Use

Page C.8-1; Paragraph 2; Line 5: Please make the following correction: *"..... Portions of the transmission line route parallel and/or cross the California Department of Transportation (Caltrans) U.S. 395, State-Highway-70, Hwy 299, Southern Pacific Transportation Company (SPTC), Northwestern-Pacific Railroad-(NWPRR), and Union Pacific Transportation Company (UPTC) ROW's."*

Page C.8-2; Paragraph 5; Line 4: Please remove the following sentence *"From about A06 to C01, Segment A crosses over and parallels an unnamed mountain bike trail for about two-thirds of a mile."* Additionally, text refers to an *"unnamed mountain bike trail"*, yet the maps only show a 4WD trail. Since BLM has not designated this as a mountain bike trail, it should be deleted.

Page C.8-2; Paragraph 3; Line 5: Please remove the following sentence *"The portion of the proposed route north of Hwy 299 is located in a mixed zoning district that includes commercial and residential designations."* This sentence applies to Segment B only.

Page C.8-5; Paragraph 1; Line 3: Please make the following correction: *"At the Town of Termo, Segment K crosses Termo School District property and the Termo-Grasshopper-Road* **Juniper Ridge Road (Old Mail Route Road)** *and crosses just east of a Caltrans....."*

Page C.8-5; Paragraph 2; Line 5: Please make the following correction: "Segment L at L02 crosses US 395 about 1 mile northwest of the Tule Patch Springs roadside park." As written, it states that the Proposed Project would cross the roadside park this is not the case. A.1-108

Page C.8-9 Paragraph 4, Line 1: There seems to be some confusion regarding the width of the ROW. It will be 160 feet wide (80 feet either side of the centerline). Any discussions regarding 330 feet or 660 feet should be referred to as the study corridor, not the ROW. A.1-109

Page C.8-10: Table C.8-1 Please make the following corrections: "Proposed segment E: Residence (APN 031-310-50)... Distance (feet) from the ROW centerline is **925 feet.** Proposed segment K: Trailer (APN 057-020-54)... Distance (feet) from the ROW centerline is **925 feet."** This property is owned by an absentee landowner. The trailer has not been occupied on a continuous basis for the past two years. A.1-110

Page C.8-11, Table C.8-1 Segment X: North Foothill Apts. ... Distance (feet) from the ROW centerline is 265 feet. Sierra Pacific has field measured this distance from the proposed centerline, to the nearest building. A.1-111

Page C.8-12; Paragraph 1; Line 10: Please make the following correction: Replace the existing sentence with: "The FAA regulates the construction of potential obstructions to air traffic and requires the filing of a Notice of Obstruction for project facilities over 200 feet above the ground and /or near airports and heliports." A.1-112

Page C.8-21; Paragraph 5; Line 2: Please make the following correction: "....*based on CEQA guidelines,~~previous environmental documents analyzing transmission line projects and other projects in the region,~~ and the land uses....*" Since no such documents are listed in the reference section of this chapter, the references in the text should be deleted. A.1-113

Page C.8-22; Significance Criteria: Please note that the sources of these criteria should be identified and justified. Only two of the thirteen criteria are specifically identified by CEQA as significant impacts (fourth bullet under General Uses and the first bullet under Agricultural Uses). The second bullet under Agricultural Uses includes a CEQA significant impact, but the Lead Agencies have added additional impacts (grazing lands) which are not identified in CEQA. The remaining ten significance criteria are not identified in CEQA, nor are they what would be considered professional standards. In CEQA Guidelines 15064(a), it is clear that a significance criteria should be based on a substantial effect on the environment, not merely any effect as provided in the remaining ten criteria. A.1-114

Page C.8-25; Mitigation Measure L-3, dealing with construction related access constraints to recreation areas, should be deleted and the text should merely refer to A.1-115

Mitigation Measures T-1 and T-2, which would cover all project related transportation issues. A.1-115

Page C.8-26; Paragraph 1; Line 2: Please make the following correction: "*.....staging areas would require temporarily removing~~ sections of fencing along grazing allotments~~ and accessing construction areas through existing* or new *gates. ~~If these open fence sections were not immediately replaced or covered by temporary barriers, or~~* If *gates were inadvertently left open,* and if *grazing animals* were *disturbed by construction activities and trying to move away from the construction area* they potentially *could move to or across U.S. 395 or other roads or to another grazing allotment."* A.1-116

Page C.8-27 and following: Mitigation items L-4 and L-7 Construction Schedule Modifications and Compensation for Loss of Grazing and Croplands

We are very concerned about the manner in which the Draft EIR/S evaluates and mitigates grazing and cropland land use issues. As background, we understand that temporary interruptions to ongoing grazing and agricultural land uses are not "significant" or "substantial" for environmental purposes. This understanding is based on the requirements of NEPA, CEQA, other applicable laws and regulations, and the significance criteria used in the Draft EIR/S itself, including:

- Permanent or long-term impairment of the productivity of prime cropland, grazing land, or other agricultural operations (emphasis added)

We are concerned, however, that the Draft EIR/S analysis of land use impacts to grazing and agricultural lands is inconsistent with this appropriate significance criteria in that it appears to assume that even temporary losses to non-prime cropland and grazing lands are significant and require mitigation. A.1-117

We do, of course, agree that these types of temporary interruptions to these ongoing land uses are an economic impact, and our easement agreements with landowners (and lessees) take these economic impacts into account in terms of the agreement. We do not agree, however, that these temporary impacts are significant adverse impacts to the physical environment, or that the corresponding mitigation measures (L-4 and L-7) are warranted or appropriate under NEPA, CEQA or other environmental laws or regulations. We are also very concerned about the impact to our ratepayers, and the precedential effect for future BLM and CPUC environmental documents, of concluding that all temporary impacts to non-prime cropland and grazing lands are significant impacts to the environment.

We have the following specific concerns and recommendations for your consideration:

- Page C.8-25, ¶ 3: This paragraph should be deleted or substantially modified. The potential impacts described are not consistent with out prior experience, or

that of our experts, in constructing other linear construction projects in grazing areas.

- Page 8-27, ¶ 3: Mitigation Measure L-4 should be deleted in it entirety. We have also discussed this issue and mitigation requirement with representatives of the BLM's Eagle Lake Resource Area, Alturas Resource Area and the Carson City District Range Management, and were advised that they found this Mitigation Measure to be unnecessary and unreasonable for this proposed project.

- Page C.8-28, ¶ 2: We recommend that this paragraph be modified (beginning with the second sentence of the paragraph) as follows:

> This temporary loss of the use of cropland would result from removing vegetation and grading for site preparation, overland travel, assembling and erecting structures, installing conductor and shield wires and site clean up." Less than 5 miles out of the 165-mile project crosses lands which are currently used for agricultural purposes. Since these lands are not considered "prime agricultural land," project impacts are not considered significant for CEQA or NEPA purposes. The applicant has entered into easement agreements with the farmers along the ROW, and these farmers are reimbursed for the temporary economic impacts caused by the interrupted use of croplands by being paid the value of crop losses resulting from construction activities. Any long-term economic impacts to the farmers' operations (irrigation or field management) resulting from the project are also considered in the land valuation and accounted for in the easement negotiations.

- Page C.8-28, ¶ 5: We suggest that Mitigation Measure L-7 should be changed to read as follows:

> Prior to constructing the proposed project, the applicant shall work with the farmers and attempt to agree to a construction schedule that would, to the extent possible, avoid the growing season. However, the applicant construction schedule requires (due , e.g., to weather or environmental constraints) that construction occur in an actively farmed field, the applicant will be required to reimburse the farmers for any temporary crop losses. Since this is not considered a significant or potentially significant impact to the physical environment, there is no need for any construction schedule adjustment to be mandated by the Construction, Operation and Maintenance Plan.

A. 1-117

Page C.8-27; Paragraph 1; Line 5: Please make the following correction *".....as a resul of removing sections of fencing and leaving gates open would be a significant, mitigatable impact (Class II) due to the conflict of temporary fence removal with the established use of land for grazing."*

Page C.8-27; Paragraph 2; Line 2 Please make the following correction; *".....significant* **movement of grazing animals** *to a level of non-significance."*

Page C.8-27; paragraph 4, line 1- Mitigation Measure L-5 should be deleted in its entirety. The temporary removal of sections of fencing is not a practice utilized in the construction of electric transmission lines. Therefore, there is no significant loss of grazing animals as a result of removing sections of fencing.

Page C.8-28; paragraph 3, line 4 This portion should be rewritten, as follows: "This temporary loss of the use of cropland would result from removing vegetation and grading for site preparation, overland travel~~, excavating for structure foundations~~, assembling and erecting structures, installing~~ conductor and shield wires and site clean up and planting an~~ ~~maintaining vegetation for site restoration.~~" The determination that the potential loss of cropland is not supported with any scientific or factual data. Further, less than 5 miles ou of the 165 mile project cross lands currently used for agricultural purposes. Since these lands would not be considered "prime agricultural land," the project-related effects on these lands would not be considered significant by CEQA. It should be noted that the farmers are reimbursed for the value of crop losses resulting from construction activities. Any long-term impacts to the farmers' operations (irrigation or field management) resulting from the project are considered in the land valuation and accounted for in the easement negotiations.

Page C.8-28 paragraph 5, line 1 Mitigation Measure L-7 should be changed to read as follows: "Prior to constructing the proposed project, the applicant shall work with the farmers on a construction schedule that would, to the extent possible, avoid the growing season. However, applicant reserves the right to construct in an actively farmed field and reimburse the farmers for any temporary crop losses." The mitigation for permanent or temporary crop loss or avoiding a growing season is solely negotiated by the applicant and the owner of record of the agricultural land. Unless a state lead agency has an interest in the agricultural land, they are not a party to the negotiations. Therefore, there is no need for any construction schedule adjustment to be mandated by Construction, Operation and Maintenance Plan.

Page C.8-31; Paragraph 4; Line 7: Please make the following correction: "....historic environment of the recreational areas. and degrade the quality of the recreational ~~experience of the users of those areas.~~" The text references the Visual Resources section regarding the potential impacts to the recreationists from the change in the character of the environment by views of the transmission line. However, the Visual Resources section does not substantiate this claim, but consistently indicates (e.g. pages C.13-32 and 35) that due to the relatively small number of recreationists viewing the transmission line, it would

not result in a significant visual impact. Therefore the discussion of the potential degradation of the recreational experience should be deleted. A. 1-123

Page C.8-31; Paragraph 4; Line 10: Please make the following correction: "....the Tule Patch Spring Rest Area ;~~Infernal Caverns Battleground Memorial Monument,~~ and Lassen Red Rocks Scenic Area. The presence of the project structures would degrade the natural setting(natural spring, bluff, and vegetation transition) at the Tule Patch Spring Rest Area ~~; the historical setting (1867 battleground, soldiers' graves, and Indian rock rings and hunting blinds) at and near the Infernal Caverns Battleground Memorial Monument~~ and the unusual geologic....." The text indicates that the change in character of the environment resulting from the presence of the transmission line would be significant at Infernal Caverns Battleground Memorial Monument. However, on pages C.13-17 and C.13-35 in the Visual Resources section, it states that the project would be barely visible and would not result in a significant adverse visual impact. Therefore, the inclusion of the Infernal Caverns in this paragraph can not be substantiated and should be deleted. A. 1-124

page C.8-31 paragraph 1, line 1 Mitigation Measure L-8 should be deleted in its entirety. This mitigation measure would impose EMF standards that are not regulated or mandated by the CPUC. A. 1-125

Page C.8-32; Paragraph 2; Line 6 through Line 10: The following sentences are to be deleted: ~~"Activities within the ROW for constructing.....trail and access road. Human activity, truck traffic.....use of the trail and access road."~~ These lines are a discussion of construction related potential impacts and should be located in the section dealing with the Operations Impacts on Recreational Uses. A. 1-126

page C. 8-33; paragraph 5, line 6- After line 6, the following new paragraph should be added: **"BLM and CDFG are actively engaged in the "Fort Sage Exchange" in which CDFG will exchange the eastern portion of the Doyle State Wildlife Area impacted by the Motorcycle/ATV loop trail for BLM lands in the Bald Mountain Area southwest of Standish, CA."** This information appears to have been left out of the discussion regarding the Wildlife Conservation Areas. A. 1-127

page C.8-34 paragraph 2, line 3. We do not agree that the Proposed Project would irreparably limit the California Fish and Game's (CDFG) ability to carry out its mission for management of the area. Please describe how the presence of transmission structures, occupying less than 60 square feet each and spaced approximately 1,200 feet apart, would irreparably limit CDFG's ability to carry out its mission (the original premise for the purchase of the areas was for the providing Mule Deer winter range), while the CDFG currently allows intensive and resource destructive OHV use in its Doyle Wildlife Area. For example, in Table C.8-3 CDFG has assigned a degradation factor of only 0.1, which should represent a nearly pristine undisturbed environment according to the definition provided in footnote 3, for two parcels in the OHV area of the Doyle Wildlife Area. A lot of inconsistency appears in the evaluation of the project's impact to the Wildlife A. 1-128

Conservation Areas, please explain or provide the analysis that has led to the conclusions reported in this document. A. 1-128

page C. 8-35; Table C. 8-3 - The Doyle Wildlife Conservation Area (Proposed Segment Q) mitigation calculations should be deleted in its entirety since these lands are currently slated to be exchanged to the BLM. The Hallelujah Junction Wildlife Area (Alternative Segment WCFG) impact and mitigation calculations have not been adequately discussed in this document. Please provide a description and analysis supporting the degradation factors which have been used in this table.
As stated on page C. 3-25, the Hallelujah Junction Wildlife Area and the Doyle Wildlife Area located in Long Valley were acquired by the CDFG as mule deer wintering habitat. If this is the case, then the impact is not an issue of visual degradation (i.e., dominant feature in the view shed), but one of wildlife habitat impact. There is no justification or explanation provided for 1/2-mile-wide corridor impact. This table is inadequate due to its lack of supporting documentation and needs to be rewritten so as to either reduce the amount of CDFG compensatory land or provide the justification. A. 1-129

C.8-40; Paragraph 1; Line 1 through Line 5: The first five lines of this paragraph appear to be misplaced. It looks like it should be the first paragraph on page C.8-36. A. 1-130

Page C.8-41; Paragraph 3; Line 3: Please add the following sentence: " On April 4, 1995, the Modoc County Board of Supervisors approved revisions to the General Plan and Zoning Ordinances to provide for a route review process." A. 1-131

page C.8-56 paragraph 3, line 6 Please make the following correction: ~~" This alternative route would cross... within the 660 foot study corridor."~~ These two sentences should be deleted because the proposed centerline of this alternative does not cross the Five Springs WSA, nor will the 160 foot-wide right-of-way. A. 1-132

<u>Noise</u>

Page C.9-6 paragraph 1 line 2 -Reads 660-foot wide ROW should read "660-foot wide study area" A. 1-133

Page c.9-7 paragraph 4 line 2-reads "proposed Pipeline" should read "proposed project" or "proposed transmission line" A. 1-134

Page C.9-13, Mitigation measure N-1 should allow for construction during any time frame as established by local ordinances. The time frames recommended in the DEIS have no basis and are more stringent or in conflict with ordinances of local jurisdictions. The Applicant/Contractor should only have to comply with local jurisdictional requirements A. 1-135

Page C.9-14, mitigation measure N-3 is redundant with and should be combined with mitigation measure L-1, page c.8-24. A. 1-136

Public Health and Safety

Page C.10-5, paragraph 4, line 6, after the word "inconclusive," add "and contradictory." A. 1-137

Page C.10-10, just ahead of the French-Canadian Study, add a new occupational study by "Southern California Edison."

A study of Edison personnel looked for an association between exposure to EMF and dying of cancer, with an emphasis on leukemia, brain cancer, and lymphoma. All Edison personnel who worked for at least one year between 1960 and 1988 were included in the analysis, some 36,221 employees.

The study results found no consistent association between work in electrical occupations or magnetic fields measured in the work environment and death from all cancers combined, leukemias, brain cancers, or lymphomas. Use of a single job title to flag exposure, the method most commonly found in the literature, resulted in the highest odds ratios, but all of our results were compatible with the null value.... A. 1-138

Incorporation of data on multiple jobs, duration in jobs, and a variety of exposure scores based on measured magnetic fields, which provides a more complete assessment of exposure, results in odds ratios near or below 1. These results are consistent with the cancer incidence findings among Swedish electric utility workers and do not support the positive findings reported among New Zealand workers or in the U.S. mortality studies.

Page C.10-20, paragraph 1, line 3, change "line induces current in the ...." to "line induces voltages or currents...." A. 1-139

Page C.10-25, paragraph 1, line 1, change "section C.11.1 "to" section C.10.1." A. 1-140

Page C.10-27, paragraph 4, line 4, change "35 feet" to "34 feet." A. 1-141

Page C.10-28, figure C.10-1, change minimum ground clearance from 35 feet to 34 feet, and change the H-frame structure insulator configuration from 'I' strings to 'V' string per figure B.2-3. A. 1-142

Page C.10-30, paragraph 2 and page C.10-29, figure C.10-2. The phasing on both single pole and H-frame structures should be changed from "cross phasing" to alike phasing" because typical current flows on the two 230kV circuits will be in the opposite directions. A. 1-143

Page C.10-30, paragraph 1, line 3. Change (ABC on top or east circuit and CBA on bottom or west circuit)" to "(ABC on top or east circuit and ABC on bottom or west circuit)" because typical current flow on the two 230kV circuits will be in the opposite directions. A. 1-144

Page C.10-30, paragraph 2, line 1. The first sentence should be changed to reflect that the ROW for the proposed 345kV H-frame section would be 160 feet, and the ROW for the 345kV single pole section would be 140 feet. A. 1-145

Page C.10-30, paragraph 3, line 4. Change "35 feet" to "34 feet." A. 1-146

Page C.10-31, paragraph 7, line 4, change "35 feet" to "34 feet." A. 1-147

Page C.10-31, paragraph 1, line 6, change (160 foot ROW) to (160 feet for 345kV H-frame, and 140 feet for single pole). A. 1-148

Page C.10-31, Table C.10.5, change 345kV vertical and H-frame electric field data in the table, based on 34 feet conductor height revised Phase-Phase spacing, and 160 foot ROW for the H-frame section and 140 foot ROW for the single pole section. A. 1-149

Page C.10.31, paragraph 2, line 6, change "35 feet" to "34 feet." A. 1-150

Page C.10-31, paragraph 2, line 8, change (see Table C.10-1) to (see Table C.10-2). A. 1-151

Page C.10-33, Figure C.10-4, Page C.10-37, Figure C.10-8. The figures reflect a ROW of 140 feet (±70 feet), but the actual ROW is 160 feet; change the drawings to reflect 160 feet ROW (±80 feet). A. 1-152

Page C.10-40, Table C.10-7, change 345kV vertical and H-Frame magnetic field data in the table, based on 34 feet conductor height revised phase-phase spacing, and 160 foot ROW for the H-frame, and 140 foot ROW for the vertical section. A. 1-153

Page C.10-40, paragraph 2, line 2, change "1.6kV/m" to "1.15kV/m." A. 1-154

Page C.10-42, paragraph 2, line 3, change "300 feet" to "265 feet," and add the following:

> (The minimum separation distance required by GO-95, from line conductor to a structure (building etc.) is 15 feet. There are no other separation distance requirements based on health and safety issues. It happens to be that the closest residence to the line along the line route is at 265 feet.)

A. 1-155

Page C.10-42, paragraph 4, line 5, change "21.5 feet" to "22 feet." A. 1-156

Page C.10-43, last paragraph, line 2, change "20kV/cm" to "17.7kV/cm." A. 1-157

Page C.10-44, paragraph 3. Include the following; A. 1-158

Line voltage i.e. 345kV
Line elevation, i.e. 5,000 feet A. 1-158

Page C.10-47, mitigation measure paragraph 5, line 1, after the "fire fighting equipment" specify equipment (i.e., shovels, backpack water pumps, fire extinguishers etc.). A. 1-159

Page C.10-47, paragraph 3, discusses the operation and maintenance of the project, while the associated mitigation measures P-4, P-5, and P-6, discuss mitigation during project construction. This paragraph may be better placed as part of paragraph two and fall below the mitigation measure P-3. A. 1-160

Page C.10-47, paragraph 3, if the above recommendation is implemented, remove the last sentence in paragraph three. A. 1-161

Transportation and Traffic

Page C.12-2 Table C.12-1 What is the source of the data for this table? The numbers appear to be a little high, given Sierra Pacific's recent familiarity with these roadways. For instance-County Road 62/Bayley Reservoir Road lists 48 vehicles/day, which is very high based upon our actual knowledge of this road. A. 1-162

page C.12-11 last bullet-These two criteria should be combined into one as follows: Any project structures which constitute a potential hazard as determined by the Federal Aviation Administration (FAA) would be considered a significant impact and would require mitigation in accordance with FAA regulations. A. 1-163

page C.12-14 mitigation item T-4 This item should be deleted because the project does not come in close proximity to any designated pedestrian/bicycle routes. A. 1-164

page C.12-16 mitigation item T-6,: With so few workers traveling to such diverse work sites, it is likely these "crew trucks ... to shuttle construction workers" will be pickup trucks. A. 1-165

page C. 12-16 mitigation item T-7 This item should be deleted because the project does not impact any existing parking places. A. 1-166

page 12-17 through 19 mitigation items T-9, T-10 and T-11 We suggest that these three mitigation items be rewritten into one mitigation measure, as follows: The applicant will be required to comply with all applicable FAA regulations regarding filing a Notice of Proposed Construction or Alteration. The applicant shall further implement mitigation measures prescribed by the FAA in response to the Notice. A. 1-167

Visual Resources

page C.13-32 and 33 mitigation item V-8,: With this commitment to minimize structure height and the skylighting effect at Daggert Canyon prior to permit issuance, the need for pre-construction verification staking is justified in order to perform this mitigation measure. It should also be noted that there is a trade-off with structure height reduction, which is to add additional structures and reduction of the spanning ability being used to reduce impacts to sensitive plants and animals. A. 1-168

Page C.13-24; Paragraph 1; Line 2: Should read ".... power line and two a radio transmission towers." A. 1-169

Page C.13-30; Paragraph 4: It appears that the EIR/S does not give credit or include the applicants proposed mitigation of corten steel structures and non-specular conductor. These are two important mitigation measures which reduce visual impacts and should be included. A. 1-170

Page C.13-31; Paragraph 1; Line 3 Please make the following change ".... line wood pole corten steel H-frame structures, ..." A. 1-171

Page C.13-31; Mitigation Measure V-6; Line 3: Please make the following change. ".... except for the substation access road (~~15~~ 25-foot maximum width). ..." A 25-foot width substation access road is required in order to have enough room to maneuver the transformer delivery equipment through its required angles and curves. A. 1-172

Page C.13-39; Paragraph 2: The consistency of the Proposed Project with Lassen County policies should be tempered with acknowledgment in the text that LMUD has a 34.5 kV transmission line connecting the Honey Lake Power Plant along the scenic corridor of Wendel Road. A. 1-173

Page C.13-47; Paragraph 1, Line 1: "... the Proposed Project could result in a ~~significant and unavoidable cumulative~~ an additional visual impact ..." Since LMUD already operates a transmission line along Wendel Road there would be little, if any, cumulative impact from the intertie to the Proposed Project. A. 1-174

Figure C.13-3B; KOP 3; Photo simulation: The tower heights are out of scale with the surroundings by an approximate factor of 200 percent. This photosimulation should be removed from the document or redone to accurately reflect actual conditions. A. 1-175

Figure C.13-4B; KOP 4; Photo simulation: The actual centerline of the proposed transmission line crossing HWY 299 is a lot further east then shown. The line crosses east of the gate which is just to the right of and back from the HWY 299 sign in the photo. This photosimulation should be corrected. A. 1-176

Figure C.13-9B; KOP 9; Photo simulation: This photo simulation is also innaccurate. The centerline alignment is over 300 feet from the edge of the highway paving (referencing the closest structure in the photosimulation). The closest structure in this photo simulation would appear to be on the edge of the highway right-of-way. The project's visual impacts will be greatly reducedwhen the actual centerline is corrected. A. 1-177

Photo-Simulations: Nowhere in this document is the methodology or technology of how the photo-simulations were done. It is important that this be made part of the document, so the reader can make a determination of the validity of the simulations. A. 1-178

Evaluation of Transmission Alternatives

Page C.14-2 Table C.14-1 Tracy-Silver Lake Alternatives for both the 120 kV and 345 kV options, the Improve Service Reliability- Primary Project Objectives should read " No, except for providing transmission service to North Valley" A. 1-179

Page C.14-3 Paragraph 4, Lines 2 & 3- Please change the second and third sentences to read "The Tracy-Silver Lake Alternatives would improve service reliability to the North Valleys but not the Reno/Lake Tahoe area (see Table C.14-1). These alternatives are considered collectively with the Midpoint-Toano-Carlin-Valmy, Midpoint-Carlin-Valmy and Burns-Oreana Alternatives in Section C.14.4, since they meet a portion of the Alturas Intertie objectives." A. 1-180

Sierra Pacific
POWER COMPANY
Meeting the future with energy
6100 Neil Road, PO Box 10100, Reno, Nevada 89520-0400 • 702 689 4011

Ms. Julie Halligan
California Public Utilties Commission
Commission Advisory and Compliance Division
505 Van Ness Ave.
San Francisco, CA 94102

June 1, 1995

Dear Ms. Halligan,

Please find attached, Sierra Pacific Power Company's "EMF Field Management Plan" for the Alturas Intertie Project. The plan has been prepared under the guidelines of the Commission's No-Cost/Low-Cost EMF Mitigation Policy. Should you or your consultants have any questions regarding this plan, please give me a call at (702) 689-4429.

Sincerely,

Steven Siegel
Senior Permitting Specialist

attachment

ALTURAS 345KV TRANSMISSION LINE EMF FIELD MANAGEMENT PLAN

SIERRA PACIFIC POWER COMPANY
February 28, 1995

TABLE OF CONTENTS

		Page
I.	Project Description	1
II.	Base CaseTransmission Line, Route, and Surrounding Land Use Descriptions	1
	1. Base Case Line Description	1
	2. Base Case, Proponents Environmental Assessment (P.E.A.)	2
	3. Base Case - Land Use Description Along the Proposed P.E.A. Route	3
III.	No Cost Field Reduction Measures to be Implemented	5
IV.	Priority Areas Where Low Cost Measures are to be applied	6
V.	Low Cost Field Reduction Alternatives	7
VI.	Field Reduction Alternatives Selected	9

Attachments

- Base Case H-Frame Structure
- Modified Base Case H-Frame Structure
- Proposed Alturas Transmission Line Route

I. Project Description

Sierra Pacific Power Company based in Reno, Nevada, has proposed the construction of a 345kV electric power transmission line. The project would entail construction of an approximately 160 mile 345kV transmission line, and is planned to be supported by tubular self-weathering steel H-frame configured structures. A new 345/230kV substation (Hilltop Substation) would be constructed at the project's northern terminus in the vicinity of Alturas, California, and a new 345kV switching station (Bordertown) would be constructed in California near the state line at Bordertown. Substation additions are also expected at the existing North Valley Road Substation located at the project's southern terminus in Reno, Nevada.

II. Base Case Transmission Line, Route, and Surrounding Land Use Descriptions

1. Base Case Line Description

Sierra Pacific has used two types of towers for its 345kV transmission lines; a guyed lattice delta tower and an H-frame steel tower. The H-frame tower was initially selected as a base case for this project through the public agency input for its aesthetics and its cost-efficiency. This tower was also accepted by the public over the lattice tower for its aesthetics during the public workshops.

The H-frame steel tower was also selected by Sierra Pacific for its high overall ratings of maintainability, reliability, aesthetics and overall electrical characteristics. The transmission line will be designed and operated to comply with all federal, state and local regulations, and applicable safety codes.

Typically, H-frame tower 345kV, A.C. transmission line would be constructed using twin 795MCM, ACSR subconductors bundled at 18 inch spacing. The three phases will be arranged in a horizontal configuration, with 'I' string insulators on the outside phase and 'V' string insulators on the center phase, and supported on H-Frame tubular steel structures. Two extra high strength steel overhead shield wires will be attached at the top of each structure and will provide lightning protection.

The twin 795 MCM conductors have a thermal loading capacity of 1076 MVA. System capacity limitations on both ends of the transmission line will limit the system normal peak transfer capacity to 300 MVA. Typical average peak load on the transmission is expected to be 210 MVA (350 amps).

The conductors will be "sagged" so as to provide a minimum clearance above ground of 34 feet at 130 degrees Fahrenheit. Right-of-way width required is 156 feet for a single circuit H-Frame 345kV line.

Line Length:	≅ 160 Miles
Voltage:	345kV
Typical Average Load Current:	350 AMPS
Conductor:	2-795 MCM ACSR
Structure:	Self Supporting Tubular Steel H-Frame
Conductor Configuration:	Horizontal
Phase to Phase Spacing:	29 Feet
Minimum Vertical Ground Clearance:	34 Feet
Right-of-Way Width:	156 Feet (Based on GO-95 Requirements)
Transmission Line Project Costs:	$66,190,000
Transmission Line:	$57,735,000
Right-of-Way:	$8,455,000

2. Base Case, Proponents Environmental Assessment (P.E.A.) Route Description

The base case 160-mile route originates just north of Alturas at a tap point on the existing Bonneville Power Administration 230kV transmission line. The line would connect with the proposed Hilltop Substation, (Old Mill Site) north of the Pit River and south of Highway 299 west of Alturas; and then the line runs southerly to and then along a plateau well to the west of U.S. 395 until approaching U.S. 395 approximately three mills south of Madeline. Figure B. 2-2a illustrates this portion of the proposed route.

The route would then cross to the east side of U.S. 395, paralleling or in close proximity to the route of the proposed Tuscarora Gas Pipeline through the Madeline plains to Ravendale. The route then runs east approximately two miles then south approximately four miles to the route of the proposed Tuscarora Gas Pipeline. Thence the route parallels or is in close proximity to the proposed Tuscarora Gas Pipeline. The route would then closely parallel U.S. 395 through Secret Valley. In the vicinity of Smoke Creek Ranch Road, the route leaves U.S. 395 heading south/southeast to the east side of Wendel then south along the eastern boundary of Sierra Army Depot. Figures B. 2-2b and B. 2-2c illustrate this portion of the proposed route.

The proposed transmission line route would then go around the east side of the Fort Sage Mountains, then again paralleling U.S. 395 along the western foothills of the Petersen Mountain Range (east of U.S. 395). The

route would cross U.S. 395 and connect to the proposed Bordertown Substation site located within Sierra County, California, southwest of U.S. 395 near Bordertown, Nevada. As shown in Figures B. 2-2c and B. 2-2d, from the substation, the proposed route would follow along the northern and eastern flanks of Peavine Mountain where it would turn east, paralleling two existing overhead power lines to the proposed transmission line's connection with SPPCo.'s existing North Valley Road Substation in northern Reno.

3. Base Case - Land Use Description Along the Proposed P.E.A. Route

Between Alturas, California, and Reno, Nevada, the land ownership along the Proposed P.E.A. route consists of approximately 47% private land and 53% public land. The public portion includes lands of the Bureau of Land Management, the U.S. Forest Service, the California Department of Fish and Game and State Lands Commission. Private lands include open range lands and some agricultural uses, including parcels of land ranging from a few acres to large ranch holdings. The right-of-way (ROW) in which SPPCo. would have an exclusive easement would be 156 feet wide.

The following is a brief general description of the land ownership starting from Alturas, California: Starting just at the outskirts of Alturas city limits, the first four miles cross lands being used for agricultural purposes. The preferred line route has avoided crossing existing residential subdivision in this area (for aesthetic and EMF reasons). The preferred line route from Centerville Road (the road to Cal Pines, California), runs in a southerly direction and up onto the plateau above the cultivated agricultural fields in the Pit River Valley. The next, approximately, 17 miles to the Likely Fire Station crosses undeveloped open space and forest designated lands of which 63% is under the jurisdiction of the Bureau of Land Management (BLM). The preferred line route from the likely Fire Station, approximately seven miles to the north edge of the Madeline Plains, a point three-quarters of a mile due west of the town of Madeline, California, is under the jurisdiction of the BLM and a few private land ownerships.

The preferred line route then runs approximately 32 miles in a southeasterly direction from the north edge of the Madeline Plains which then generally follows on the east side of the highway U.S. 395 past Termo and Ravendale to the California Roadside Park are at Tule Patch Spring. The Madeline Plains in this area has been divided into 40 acre and 20 acre private parcels which lie within a 100 year flood plain. The area is open range with little cultivated agricultural uses. There are few inhabitants in this area. The majority of these parcels are owned by

absentee landowners. The land ownership in this segment is approximately 75% privately held.

From the Roadside Park area at Tule Patch Spring, the preferred line route turns in a more southerly direction across Secret Valley. The line route remains on the east side of highway U.S. 395 through Little Mud Flat to where the Southern Pacific Railroad (SPRR) track crosses highway U.S. 395, approximately two miles south of Little Mud Flat. This segment area is approximately 46% privately held parcels and 54% public lands. Secret Valley has some cultivated agriculture, but none is crossed by the line route.

From the SPRR track crossing highway U.S. 395, the preferred line route turns to a more south-southeasterly direction through Wendel, California, and down Honey Lake Valley north of the Southern Pacific track to the northeast corner of the Sierra Army Deport. In this segment, approximately 46% of the land is privately held. The area around Wendel, California, is a mixture of small parcels (ten acres or less) to large parcels (160 acres). The area has potential for industrial development given the existing Honey Lake Power Plant and a commercial swine operation (under construction) and Lassen County's conceptual industrial zoning for the area.

The entire P.E.A. line route segment, approximately 73 miles, from the Likely Fire Station, to the northeast corner of the Sierra Army Depot is approximately 54% privately held parcels and remaining 46% publicly held parcels.

From the northeast corner of the Sierra Army Depot, the preferred line route follows the Sierra Army Depot boundary south for about six miles before turning in a southeasterly direction to go around the east side of the Fort Sage Mountains, then southwesterly through Dry Valley to highway U.S. 395 approximately 21 miles. This preferred line route is a mixture of private parcels ranging from small parcels (ten acres or less) to large parcels (160 acres or more). While the area southeast of Sierra Army Deport is divided up into private parcels, there are few inhabitants in the area. This segment is approximately 45% privately held parcels and 55% public lands.

From the point east of highway U.S. 395 and Dry Valley, the preferred line route turns south and runs east of highway U.S. 395 and west along the base of the Petersen Mountains until it crosses highway U.S. 395 just three miles north of Bordertown, Nevada, and then southeasterly to the proposed Bordertown substation site. This segment is approximately 18 miles and is 81% public held parcels. The 19% privately held parcels

for the most part are just north of Hallelujah Junction where the area has been divided into ten acre parcels and the area near the proposed substation site. The ownerships at the south end of Long Valley next to Bordertown, Nevada, are large ranch holdings.

From the proposed Bordertown substation site, the preferred line route runs in a southeasterly direction along the base of the Peavine Peak to the existing transmission line corridor, then east to the existing north Valley Road substation. This segment is approximately 16 miles and is 47% privately held parcels and 53% public lands.

III. No Cost Field Reduction Measures To Be Implemented

Base Case; Tubular Steel H-Frame, 29 Feet Phase-Phase Spacing, Minimum 34 feet line to ground clearance at 130 degree Fahrenheit conductor temperature, 156 feet right-of-way width, load current used for the calculations is 500 A.

Magnetic field at edge of right-of-way = 26.3 mg.

1. No Cost Field Reduction #1, Reduce Conductor Spacing

Conductor phase to phase spacing was reduced from 29 feet to 22 feet by modifying outside insulator configuration from 'I' strings to 'V' strings. The right-of-way width required for the reduced phase spacing structure to meet GO-95 requirements would be 140 feet. The savings associated with the reduced right-of-way width requirements from 156 feet to 140 feet would pay for the additional insulation requirements of the modified structure. Therefore, qualifying this design change as a no cost field reduction option.

Magnetic Field Level at Edge of right-of-way = 23.3 mg.
Percent Reduction = 11.4%

This no cost modification will be applied to the full length of the line regardless of application of any low cost alternatives.

2. No Cost Field Reduction #2, Route Selection

During the route selection process rerouted transmission line in potential residential areas without increasing overall length of the line.

Magnetic Field Level at Edge of right-of-way = 23.3 mg.
Percent Reduction = not applicable

3. No Cost Field Reduction #3, Unlike Phasing

Where appropriate unlike phasing (cross phasing) technique will be applied (i.e. 230kV double circuit-near Alturas) to reduce magnetic field strengths. The unlike phasing technique may also be applied where the 345kV line may share a corridor with other existing transmission lines.

IV. Priority Areas Where Low Cost Measures Are To Be Applied

In keeping with the intent of the CPUC order on Low Cost measures, a 15% reduction in field strength at the edge if the right-of-way was selected as a target/guide for applying low cost field reduction measures for the project.

Again, in keeping with the intent of the CPUC decision, areas for which the public has raised questions most frequently are given higher priority in determining where the low cost field management measures would be applied.

For the project, low cost measures will be applied to high priority area such as schools/day care centers, followed by residential and industrial areas, recreational area and areas zoned for future residential and/or industrial use.

Schools/daycare centers, residential and commercial/industrial area's will be considered for higher field reduction (at reasonable cost) than the low priority areas such as recreation areas and agricultural areas. The number of schools/day care centers and homes within 200 feet of centerline of the currently proposed route is zero.

Due to the remote location of the line, and with minimal public exposure, the areas classified as open space, forest lands, government owned lands, unpopulated lands, etc. are not being considered for low cost field reduction measures.

Area Prioritization (Proposed Revised Route)

Priority Area	Line Length (Miles)
Schools/Day Care Centers	0.0
Residential (includes undeveloped residential)	1.35
Commercial/Industrial (includes undeveloped C/I)	0.41
Sub Total	1.76
Recreational	4.37

Agricultural/Rural	28.39
Sub Total	32.76
Undeveloped Land (Zoned for Residential)	0.0
Undeveloped Land (Zoned for Commercial/Industrial)	0.0
Unpopulated, Forested, Government Owned Land	
Conservation	71.76
Forested	2.29
Open Space	46.89
Unclassified	8.39
Sub Total	129.33
TOTAL LINE MILES	163.85

V. LOW COST FIELD REDUCTION ALTERNATIVES

Modified Base Case: Tubular Steel H-Frame, 22 feet phase-phase clearance, minimum 34 feet line to ground clearance at 130 degrees Fahrenheit conductor temperature, 140 feet right-of-way width. Load current used for the calculations is 500A AMPS.

Magnetic field at edge of right-of-way = 23.3 mg.

1. Field Reduction Alternative #1

Increase right-of-way width from 140 feet to 160 feet
Magnetic field at edge of right-of-way = 18.5 mg
Percent Reduction = 20.6%
Incremental Cost of this Field Reduction Alt. (Rural) = $1,200/Mile
Agricultural) = $2,000/Mile
(Urban) = $120,000/Mile

2. Field Reduction Alternative #2

Increase right-of-way width to 180 feet
Magnetic field at edge of right-of-way = 14.9 mg
Percent Reduction = 36%
Incremental cost of this Field Reduction Alt. (Rural) = $2,400/Mile
(Urban) = $200,000/Mile

3. Field Reduction Alternative #3

Increase conductor height by 10 feet, right-of-way width 140 feet
Magnetic Field at edge of right-of-way = 20.3 mg
Percent Reduction = 12.8%
Incremental cost of this Field Reduction alt. ≅ $9,900/Mile

4. Field Reduction Alternative #4

Install single pole steel structures (vertical configuration) in place of the H-Frame structures, and keep the right-of-way width at 140 feet (minimum ROW required for this configuration is 85 feet).
Magnetic Field at edge of right-of-way = 17.24 mg
Percent Reduction = 26%
Incremental cost/mile (in urban area) = $200,000/Mile

5. Field Reduction Alternative #5

Increase conductor height by 5 feet
Increase right-of-way width from 140 feet to 160 feet
Magnetic Field at edge of right-of-way = 17.5 mg
Field Reduction = 24.9%
Cost for Modification
Structures = $4,950/Mile
ROW (Rural) = $1,200/Mile
Incremental cost of this Field Reduction alt. (Rural Area) = $6,150/Mile

6. Field Reduction Alternative #6

Increase conductor height by 10 feet
Increase right-of-way width to 160 feet
Magnetic field at edge of right-of-way = 16.6 mg
Field Reduction = 28.7%
Incremental cost of this Field Reduction alt. (Rural Area) = $11,100/Mile

7. Field Reduction Alternative #7

Increase conductor height by 10 feet
Increase right-of-way width to 180 feet
Magnetic field at edge of right-of-way = 13.7 mg
Percent Reduction = 41%
Incremental cost of this Field Reduction alt. (Rural Area) = $12,300/Mile

8. Field Reduction Alternative #8

After the filing of the PEA, public comments were received on segment 'B' of the proposed route. The concerns were the aesthetics of the line and the EMF exposure from the line in the area designated as "future residential."

Substation location and the line route were relocated away from existing residential areas to new route segment 'A'.

Cost of this modification	= $650,000
Cost of this modification for EMF reasons = 50% ($650,000)	= $325,000

VI. FIELD REDUCTION ALTERNATIVES SELECTED

1. Install single pole steel structures with vertical conductor configuration in residential area and industrial area, 1.4 miles (East/West corridor in NW Reno), Alternative #4.

Percent Field Reduction	= 26%
Cost (S.P. Construction)	= $280,000
Total Cost	= $280,000

This alternative provides for a future reduction capability, with a second circuit in this section of the corridor: Percent reduction ≅ 38%.

Field cancellation technique will be applied in this corridor to reduce the 'net' magnetic field from all sources.

(An increase in conductor height i.e., taller structures was not considered because during public workshops the public commented that they would prefer the structures to be as low in profile as reasonably possible.)

Field reduction alternative #2 provides the highest field reduction at the edge of the right-of-way with the least incremental cost.

2. Increase the right-of-way width from 140 feet to 160 feet in recreational and agricultural areas (32.76 miles), Alternate #1.

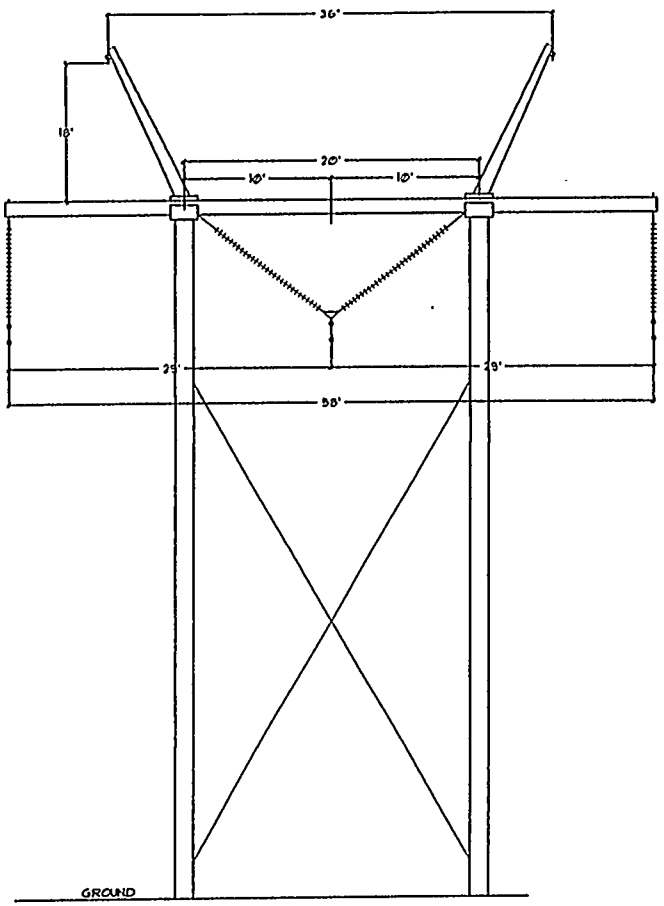
Percent Field Reduction	= 20.6%
Cost	= $65,500

Reason for selection:

This field reduction alternative was selected to provide cost-effective field reduction at the edge of the right-of-way in the agricultural areas with very limited public exposure.

3. Redesignate transmission line route from segment 'B' to segment 'A', away from future residential development.

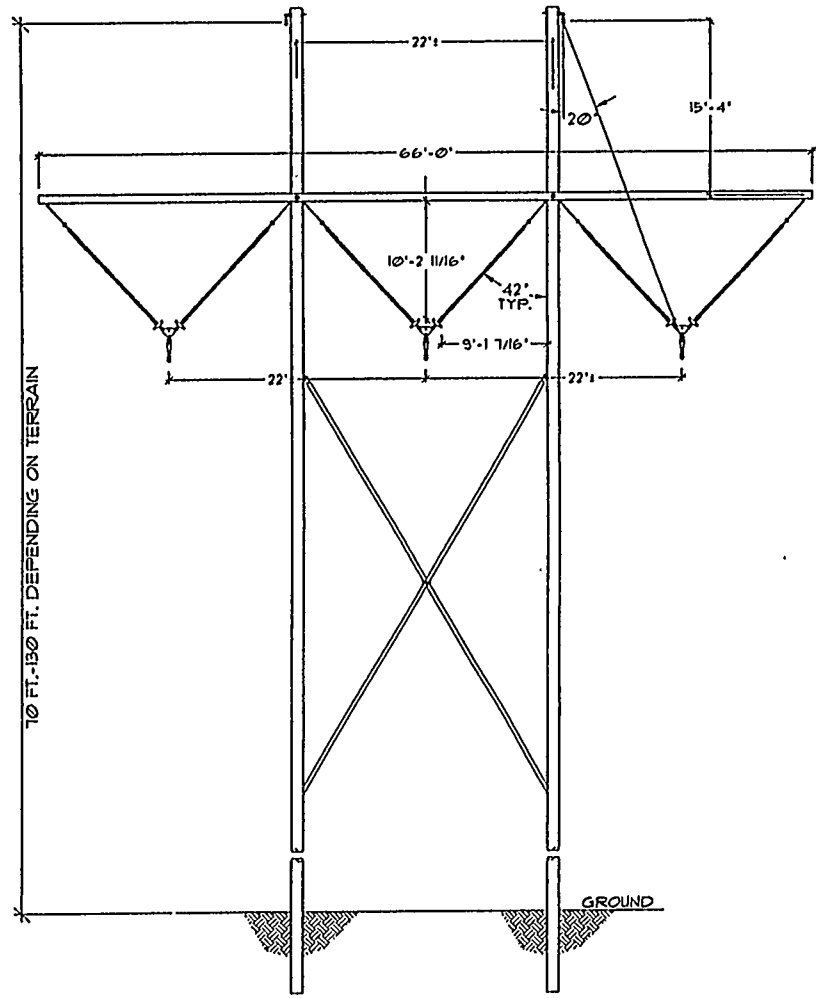
Cost	= $325,000
Total Cost of all Field Reduction Alternatives	= $670,500
EMF Field Reduction cost as a percentage of project costs	= 1.01%



ELEVATION

NOT TO SCALE

SIERRA PACIFIC POWER COMPANY					BASE CASE 345KV STEEL H-FRAME STRUCTURE	SHEET 1 OF 1
DRAWN	SUPR	MGR	DATE	REV		
WSH			9/93			



ELEVATION
NO SCALE

Sierra Pacific POWER COMPANY					MODIFIED BASE CASE 345KV H-FRAME STRUCTURE	SHEET 1 OF 1
DRAWN	DESIGN	SUPR	DATE	REV		DRAWING NUMBER
WSH			11/94			

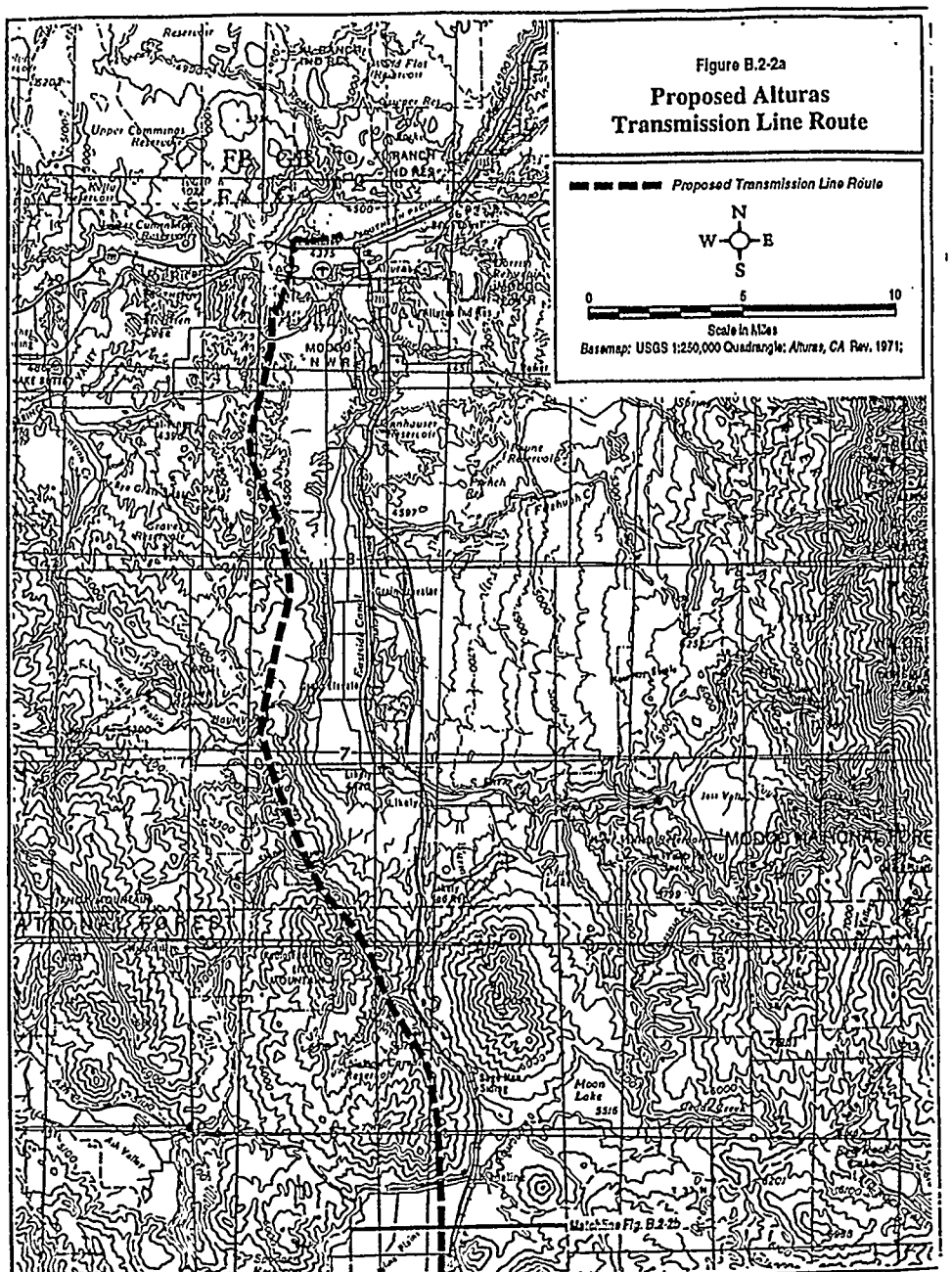


Figure B.2-2a
Proposed Alturas Transmission Line Route

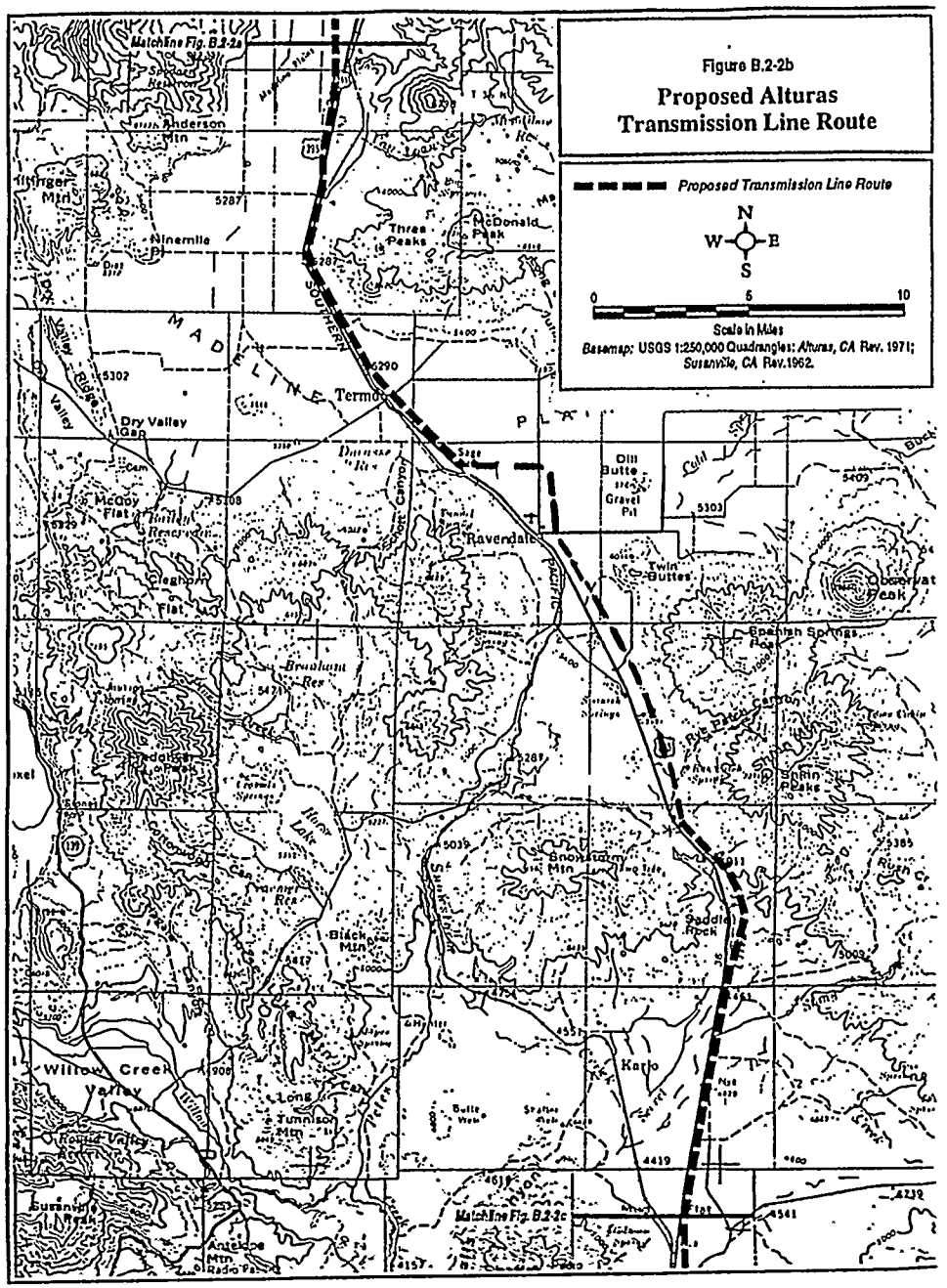


Figure B.2-2b
Proposed Alturas Transmission Line Route

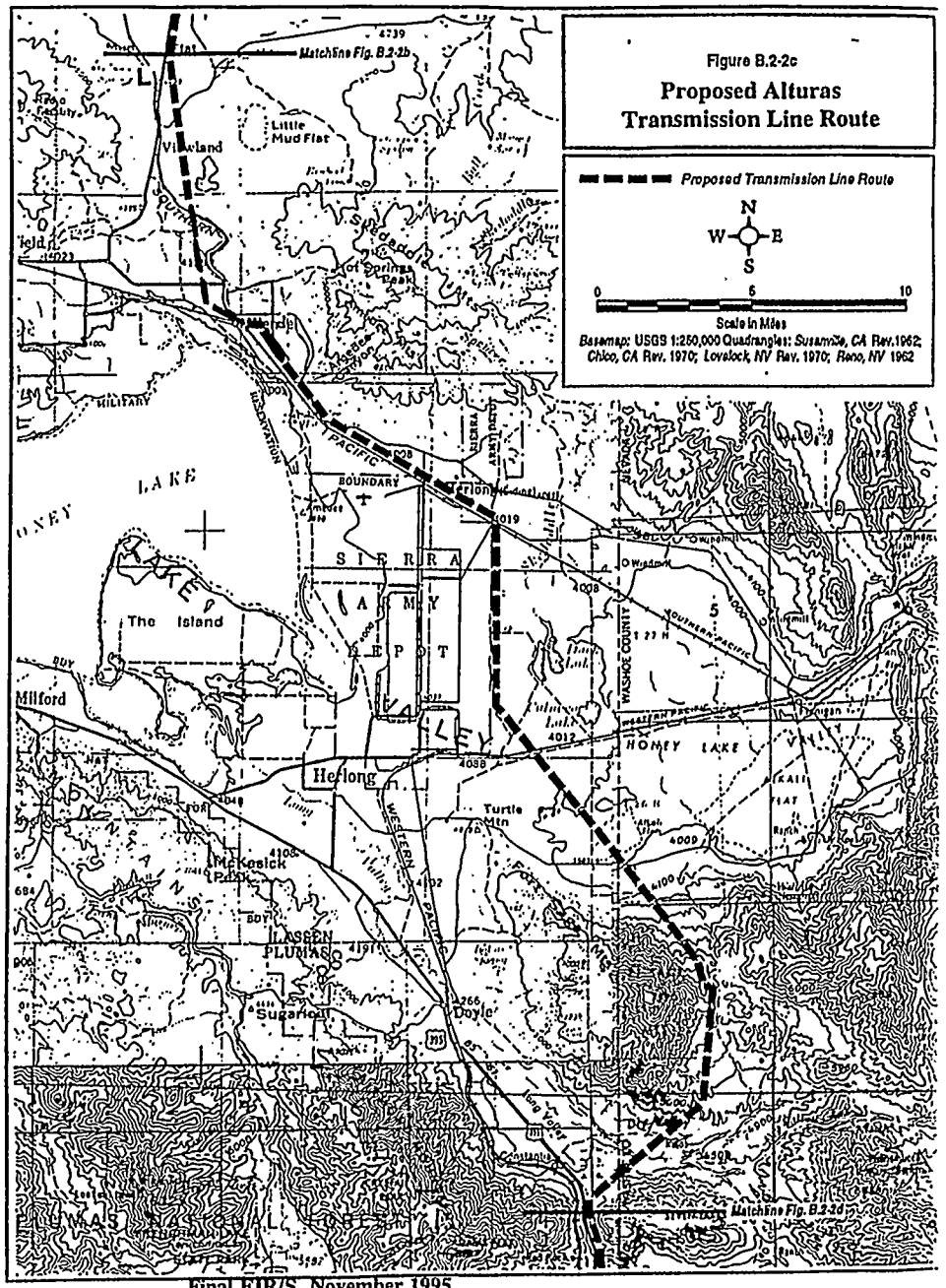


Figure B.2-2c
Proposed Alturas Transmission Line Route

Proposed Transmission Line Route

N
W E
S

0 5 10
Scale in Miles

Basemap: USGS 1:250,000 Quadrangles: Susanville, CA Rev.1962; Chico, CA Rev. 1970; Lovelock, NV Rev. 1970; Reno, NV 1962

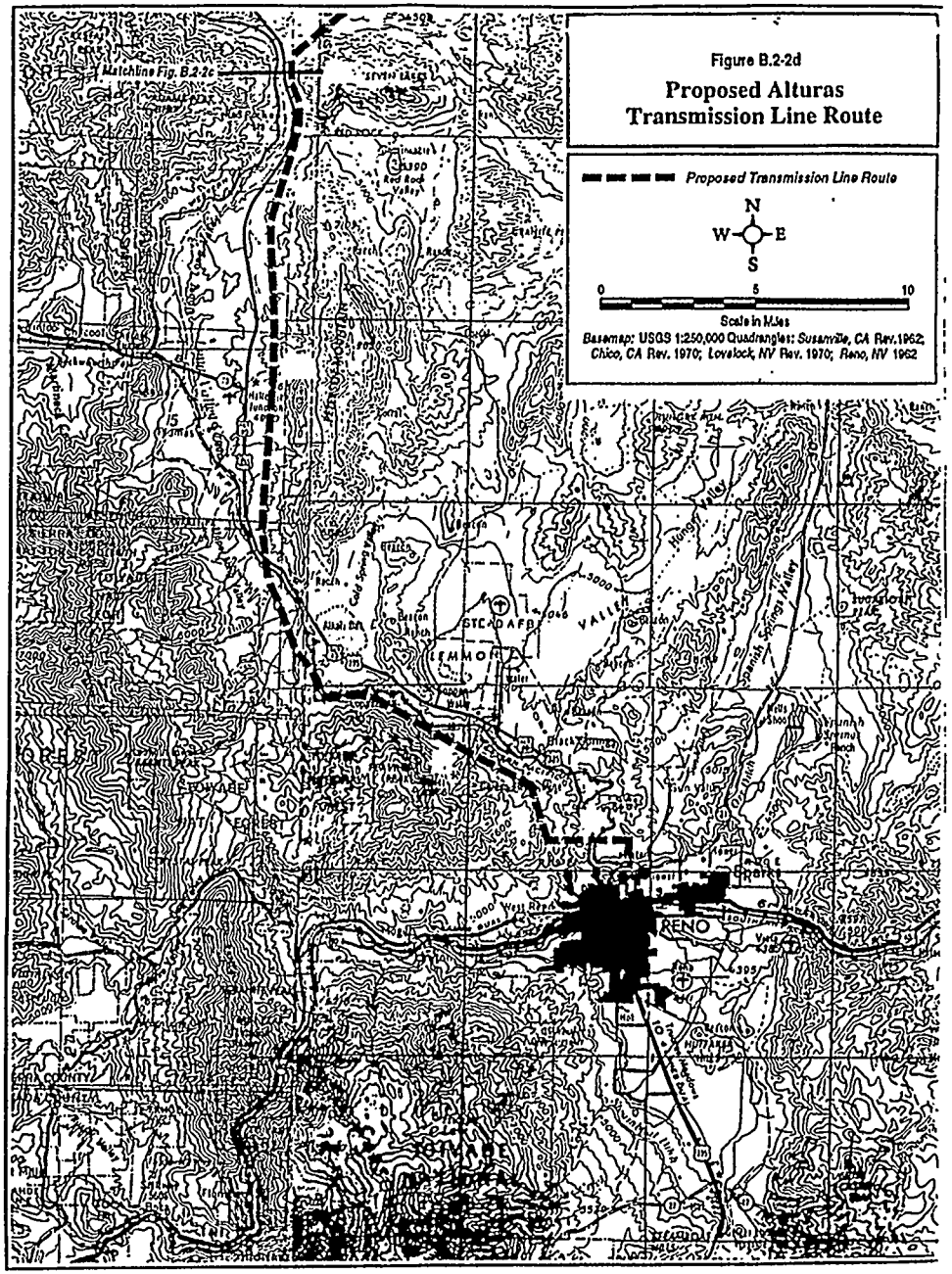


Figure B.2-2d
Proposed Alturas Transmission Line Route

Proposed Transmission Line Route

N
W E
S

0 5 10
Scale in Miles

Basemap: USGS 1:250,000 Quadrangles: Susanville, CA Rev.1962; Chico, CA Rev. 1970; Lovelock, NV Rev. 1970; Reno, NV 1962

IMFX # 95105

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Statement by the Council of The American Physical Society
April 1995

POWER LINE FIELDS AND PUBLIC HEALTH

Physicists are frequently asked to comment on the potential dangers of cancer from electromagnetic fields that emanate from common power lines and electrical appliances. While recognizing that the connection between power line fields and cancer is an area of continuing study by research workers in many disciplines in the United States and abroad, we believe that it is possible to make several observations based on the scientific evidence at this time. We also believe that, in the interest of making the best use of the finite resources available for environmental research and mitigation, it is important for professional organizations to comment on this issue.

The scientific literature and the reports of reviews by other panels show no consistent, significant link between cancer and power line fields. This literature includes epidemiological studies, research on biological systems, and analyses of theoretical interaction mechanisms. No plausible biophysical mechanisms for the systematic initiation or promotion of cancer by these power line fields have been identified. Furthermore, the preponderance of the epidemiological and biophysical/biological research findings have failed to substantiate those studies which have reported specific adverse health effects from exposure to such fields. While it is impossible to prove that no deleterious health effects occur from exposure to any environmental factor, it is necessary to demonstrate a consistent, significant, and causal relationship before one can conclude that such effects do occur. From this standpoint, the conjectures relating cancer to power line fields have not been scientifically substantiated.

These unsubstantiated claims, however, have generated fears of power lines in some communities, leading to expensive mitigation efforts, and, in some cases, to lengthy and divisive court proceedings. The costs of mitigation and litigation relating to the power line-cancer connection have risen into the billions of dollars and threaten to go much higher. The diversion of these resources to eliminate a threat which has no persuasive scientific basis is disturbing to us. More serious environmental problems are neglected for lack of funding and public attention, and the burden of cost placed on the American public is incommensurate with the risk, if any.

SERVICE TO SCIENCE AND HUMANITY since 1899. The American Physical Society is a non-profit scientific and educational organization devoted to the advancement and diffusion of the knowledge of physics. It is the principal membership organization of physicists in the United States, with over 43,000 members in academia, industry and government.

IMFX # 95105

Downloaded from the World Wide Web: May 15, 1995

Background Paper On Powerline Fields and Public Health
May 8, 1995

To: Panel on Public Affairs, American Physical Society

From: David Hafemeister Physics Department
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Re: Background Paper on "Power Line Fields and Public Health" (to be updated periodically, comments appreciated)

I. Introduction.
II. Summary and Conclusions.
III Review of ELF/EMF Reviews and Responses.
IV. Epidemiology and Cancer Data.
V. Biological and Biophysics Experiments.
VI. Theoretical Mechanisms.
VII. Prudent Avoidance and Mitigation Costs.

I. Introduction.

I.1. Role of POPA: POPA's role in the American Physical Society is to examine ways in which "physics can help society" on issues which have a physics component. Over the past several years POPA has examined aspects of the possible health effects on humans of low level, extremely low frequency (ELF), 60-Hertz electromagnetic fields (EMF) from power lines. In 1988, POPA had briefings from the staff of the Office of Technology Assessment on their ELF background report, and from the Bell Laboratory. The ELF issue is multi-disciplinary in that it clearly has elements of biology,medicine, biophysics, molecular physics and chemistry, and epidemiology. No one discipline, thus far, has a complete mastery of the subject matter. In our investigations we have found that many biophysicists are playing a key role in both theory and measurements on ELF. POPA decided it would be duplicative and expensive to begin a newstudy of the more than 1,000 papers already written on the ELF topic, a conclusion that was echoed by many professionals in the area. For example, the Oak Ridge Associated Universities (ORAU) study, described below, was a massive multi-disciplinary effort. Similar reviews have taken place in other countries and by other groups.

I.2. The Scope of this POPA Study: For these reasons, this review of the ELF data andits potential effects on public health has examined the following:

(1)Past reviews of ELF and public health, (2) the epidemiological data, (3) selected and suggested papers, and (4) interviews with "experts." Certainly this review is not totally comprehensive, but I feel that it is sufficient to draw the conclusions listed below. The scope of our review of the data has been confined to the possible connection of cancer to 60-Hz electromagnetic fields at the levels that one experiences when living near power lines, usually less than about 5-10 milliGauss (0.5-1 mT). (50% of homes have average fields greater than 0.6 mG, 1% have fields greater than 6.6 mG.) This paper will begin with the conclusions (Sec. II), followed by sections III-VII on the input data. I will refrain from commenting on controversial issues in these later sections, except where I will use square brackets, such as [DH: This result is ....]. Lastly, while this paper has been reviewed in draft by researchers in the ELF area, by POPA, and by others, its contents are the sole responsibility of the author.

II. Conclusions.

II.1. General Conclusion: The scientific literature and the reports of review panels show no consistent, significant link between cancer and the 60-Hz ELF fields. This literature includes epidemiological studies, research on biological systems, and the analyses of theoretical mechanisms. This result is consistent with those that have advanced arguments that there can be no such link. The preponderance of the epidemiological and biophysical/biological research findings have failed to substantiate those studies that have reported specific adverse health effects from the exposure to 60-Hz ELFs. it is always possible that some minor carcinogenic connection might be found, but the present data do not establish that connection. For expenditures for mitigation to be justified, there should be some consistent, meaningful combination of the following factors: (a) A plausible coupling mechanism at the cellular level exists, (b) the coupling must produce consistent biochemical changes, (c) the biochemical changes must be detrimental, (d) meaningful epidemiology data should determine the degree of danger, and finally, (e) upper-bound ELF mitigation costsshould be comparable to those for other dangers mitigated in society. The current level of spending for ELF mitigation is more than a billion dollars a year, an amount which clearly cannot be justified on the basis of applying the above criteria to the data. This spending has been driven by the combination of unlimited "prudent avoidance" in a fearful society.

II.2. Reviews of the ELF Data (Sec. III). None of the scientific panels that have carried out comprehensive reviews of the data has concluded that there is an established link between ELF and cancer.

II.3. Epidemiology (Sec. IV): The scientific panels that have reviewed the ELF epidemiology data have found them inconsistent and inconclusive. It is necessary when comparing the data to separate the results by cancer type. For example, consider the recent case of three studies of electrical workers and a fourth study of non-electrical workers in Sweden. The 1993 California study reported no association of EMF with either leukemia or brain cancer

while the 1993 Canadian-French study reported an increase in leukemia, and a modest association of ELF with brain cancer. The 1995 Savitz/Loomis study reported no association of ELF with leukemia, but they did report an association with brain cancer. The 1993 Swedish study reported an association of ELF with leukemia, but they did not report an association with brain cancer. Thus, these four "best studies" report very contradictory results. One has to look at the Savitz/Loomis data in Sec. IV.4 to gain some understanding for the statistics involved in making these judgments. It is very difficult to statistically determine relative risk factors of less than two for rare modes of death because of the many confounding factors.

II.4. Biology and Biophysics Experiments (Sec. V): The scientific review panels, the review articles, and the research papers that we have investigated do not claim a causal link between ELF and cancer. In addition, the review panels and review articles have pointed out that there is a large problem with replicating the experimental results.

II.5. Theoretical Mechanisms (Sec. VI): No plausible biophysical mechanism for the systematic initiation or promotion of cancer by these extremely weak ELF's has been identified. The lack of epidemiological evidence and experimental evidence establishing a link between ELF and cancer isconsistent with the biophysical calculations that rule out the carcinogenic effects because the thermal noise fields are larger than the fields from ELF. Since quantum mechanics, thermal noise fluctuations, and cancer promotion are all statistical effects, it is difficult to derive a proof that is a necessary and sufficient condition to preclude all cancer promotion. However, these fundamental calculations are a significant guide post to conclude that the ELF-cancer link, if any, should be extremely difficult to detect because of its small, if any, magnitude.

II.6. Prudent Avoidance (Sec.VII.1): Spending considerable funding to mitigate ELF under the guidance of "Prudent avoidance" would make sense if the ELF risk was documented and some measure of cost-effectiveness could be deteremined. This is not the case for the alleged adverse effects from ELF/EMF. Since prudent avoidance does not place a limit on mitigation costs, it allows fear to propel society's institutions to spend more than $1 billion per year ($23 billion in total by 1993). Prudent avoidance runs counter to the prioritization of spending on a cost-effectiveness basis. In normal courtroom practice, the plaintiff has the burden to prove damages or risks in order to obtain action from the society, and it should be in the ELF case as well. Prudent avoidance essentially states to the public that there is a likely possibility of danger to them and that we should begin to spend money to mitigate the risk, if any.

II.7. Who will speak on the ELF issue? The study of ELF has become a multidisciplinary effort and therefore many different professional voices are needed to comment on this issue. Thus, the National Academy of Sciences (NAS/NRC) is examining the ELF issue. Unfortunately, the NAS/NRC will only assess whether there is a health risk from ELF without consideration of

economics. If the conclusions of this paper are correct, one would assume that the NAS/NRC will conclude that the ELF risk has not been proven. However, because one cannot prove there is no risk, there will be uncertainties and the final answer can only establish an upper limit, D, on risk. Since the NAS will not address the cost for mitigation, the upper bound error bar(D) can be used as an argument for mitigation funding. Clearly, a broader approach is needed. Because physicists have worked on many aspects of this multidisciplinary topic, our views are relevant. In exploring this issue, I have asked ELF-researchers if they would be troubled if we had a statement that stated the simple concepts of (1) don't scare society with ELF, (2) don't spend billions to mitigate. Itis my impression that the serious ELF professionals will welcome such an APS statement. And, I think it is our professional obligation to speak up.

II.8. Journalism: The number of newspaper stories on ELF rose from 233 in 1992 to 548 in 1993 (S. Friedman, Quill, Jan. 1995). The number of magazine stories rose from 101 in 1992 to 216 in 1993. The writings of P. Brodeur have been followed with headlines of "Is My Electric Blanket Killing Me" to "Chilling Possibility: That A Power That Has Improved Life Could Also Destroy It" to "Warning: Electricity Can be Hazardous to Your Health." Even when an article is even-handed, the caption at the top read, "Steps to Protect Yourself from Danger -- Real and Potential." My conclusion is that the science and relative risk methodology of ELF/EMF often undercut the quality of journalism in a free and fear-prone society.

III. Review of ELF Reviews and Government/Industry Responses.

III.1. The Oak Ridge Associated Universities (ORAU) panel (Health Effects of Low Frequency Electric and Magnetic fields, June 1992) prepared its report at the request of the Presidential Committee on Interagency Radiation Researchand Policy Coordination (CIRRPC). The panel was made up of scientists from the following disciplines: 5 biologists, 3 epidemiologists, 2 physicists, 1 electrical engineer. Over a period of 1.5 years, the panel examined 1,000 journal articles. The ORAU panel concluded the following:

"From the published studies, evidence is lacking to demonstrate that electric or magnetic fields act as cancer initiators, by altering structural properties of DNA, function as cancer promoters by inducing or accelerating cell growth, or influence tumor progression."

"If a rapidly increasing widespread exposure were indeed strongly associated with childhood cancers, and if no strong countervailing trends in other risk factors were occurring, we should be witnessing an observable epidemic of childhood cancers. However, there is little, if any evidence of such an epidemic of childhood cancer."

"The suggested reproductive risks of electric and magnetic fields are not supported by the totality of the basic science and humanstudies that pertain to

reproduction. However, the fact that a reproductive effect may not seem biologically plausible and that adequate documentation of an increased risk has not been demonstrated in human studies does not mean that these concerns should be summarily dismissed."

"This review indicates there is no convincing evidence in the published literature to support the contention that exposures to extremely low frequency electric and magnetic fields (ELF-EMF) generated by such sources as household appliances, video display terminals, and local power lines are demonstrable health hazards."

"The lack of converging epidemiological and biological support for the occasionally reported adverse health effects is consistent with calculations of quantities based on fundamental laws of physics for describing electric or magnetic fields."

"Although exposure to ELF-EMF does not appear to constitute a public health problem, there is evidence that these fields may produce some biological effects, such aschanges in the pattern of secretion of the hormone melatonin and enhancement of healing of bone fractures." [DH: There is some disagreement on the melatonin and bone healing data, and much of it is at higher B fields.]

"This review does not provide justification for a major expansion of the national research effort to investigate the health effects of ELF-EMF. In the broad scope of research needs in basic science and health research, any health concerns over exposures to ELF-EMF should not receive a high priority."

III.2. UK Report: Report of an Advisory Group on Non-Ionizing Radiation, National Radiological Protection Board, Electromagnetic Fields and the Risk of Cancer 3 (1992):

"In summary, the epidemiological findings that have been reviewed provide no firm evidence of the existence of a carcinogenic hazard from the exposure of paternal gonads, the fetus, children, or adults to the extremely low frequency electromagnetic fields that might be associated with residence near major sources of electricity supply, the use of electrical appliances, or work in the electrical, electronic, and telecommunications industries. Much of the evidence that has been cited is inconsistent, or derives from studies that have been inadequately controlled and some is likely to have been distorted by bias against the reporting or publishing of negative results. The only finding that is at all notable is the consistency with which the least weak evidence relates to a small risk of brain tumors. This consistency is, however, less impressive than might appear, as brain tumors in childhood and adult are different in origin,arising from different types of cells."

"In the absence of any unambiguous experimental evidence to suggest that exposure to these electromagnetic fields is likely to be carcinogenic, in the broadest sense of the term, the findings to date can be regarded only as

sufficient to justify formulating a hypothesis for testing by further investigation."

III.3 Battelle Conference: B. Wilson, R. Steven, L. Anderson, ed, Extremely Low Frequency Electromagnetic Fields: The Question of Cancer, Battelle Press, Columbus, Ohio, 1990):

The editors state: "The first tenet of our discussion is that cancer induction is a stochastic process. That is to say, it is probabilistic in nature..... At this time, there are insufficient data to judge whether or not ELF fields influence cancer rates... To date, no convincing laboratory evidence has been obtained indicating that ELF fields cause damage to DNA... However, a recent report offers evidence that ELF exposure can increase micronuclei formation in mouse polychromatic erythrocytes, suggesting possible chromosomal loss. Effects on calciummay increase oxidative stress to cells, and tumor promoters have been found to increase oxidative stress as well. Thus experiments designed specifically to identify possible tumor-promoter activity such as initiation-promotion are suggested..... It is not our intent to argue that ELF exposure increases cancer risk; rather, we wish to suggest areas wherein future experiments may be carried out. Whether or not ELF electric and magnetic fields contribute to increased cancer risk, it is important to conduct scientific studies that will reduce the uncertainty currently associated with the question of cancer."

"Although experimental studies have shown that electromagnetic fields can, in some circumstance, affect the physiology and biochemistry of cells, they do not appear to damage directly the genetic material, DNA,in cells and therefore are unlikely to act as an initiator of cancer." [DH: There is disagreement over the reportings of some of the biological effects, particularly at the 10 mG level.]

III.4. K. Foster, "Weak Magnetic Fields: A Cancer Connection?" in Phantom Risk, Ed. by K. Foster, D. Bernstein and P. Huber, MIT Press, 1993. Foster's study covers epidemiology and bio-medical data up to November 1992, including the Swedish data. Foster's analysis and data do not support the EMF cancer connection: "In science one can draw no conclusions from unexplained phenomena or inconclusive studies. But in the courtroom it is sometimes enough just to raise questions. And these studies have done that very well." And in Physics and Society 21, 5 (1993): "The epidemiologic data does not directly point to "fields" ascausative agents... The bioeffects literature is very noisy, with manyunexplained or nonreproducible phenomena, and often speculative.... The most relevant data comes from epidemiology, followed by certain kinds of animal screening studies." (See Sec. IV.)

III.5. Institute of Electrical and Electronic Engineers (1988, 1991) analyzed six major reports (WHO-1984, WHO-1987, AIBioSci-1985, FloridaEMFSciAdComm-1985, WestAssoc-1986, NYPwrLSciAdPanel-1987):

"(1988): In response to the public interest in this subject, we have made an analysis of six recent major scientific committee reports relating to power-frequency electric and magnetic fields. All of these reports concluded that there is insufficient information to define safeand unsafe field levels. In general, there is not enough relevant scientific data to establish whether common exposure to power-frequencyfields should be considered a health hazard."

"(1988): At present there is no consensus expressed in any of the published reports as to which factor, the electric or magnetic field is biologically important. Similarly, the roles of field strength, duration of exposure, and intermittent versus continuous exposure are also unknown."

"(1991): "The associations between exposure to power-frequency magnetic fields and cancer reported in epidemiological literature thus far are not conclusive, because the degree of association has often been low, because exposure characterization and dose response information have been limited, and because the possibility of confounding factors has been only partially investigated. The laboratory studies themselves have not indicated a health hazard."

III.6. National Academy of Sciences/National Research Council (NAS/NRC): In 1991, The Congress asked the NAS/NRC to determine the possible effects of EMFs on biological systems. It is expected to be completed in late 1995. The 1992 Energy Policy Act established a $65 M/five year program on ELF research, which is being reviewed by the NAS/NRC. The Electric and Magnetic Fields Interagency Committee shall prepare a final report on the possible health effects on this research on EMF by March 31, 1997. The GAO stated (GAO/RCED-94-115): "Because of the delays, many research projects that are to be implemented under the act will not begin until fiscal year 1995, thus reducing the amount of information that can be obtained and reported to the Congress by March 31, 1997."[DH: Neither of these studies were studies were asked to consider the costs of mitigation in reaching their conclusions and recommendations. They were asked only to determine if there is, or is not, a health effect, without economic factors. If the NAS/NRC concludes that their are no health effects, but there is an upper bound uncertainty, D, thenthe political momentum of prudent avoidance can be used as an argument to mitigate on the basis of the upper bound, D, of risk.]

III.7. National Cancer Institute (NCI, http://www.os.dhhs.gov): "A small number of cell culture studies have indicated that ELF fields may causebiological effects in living tissues, such as interference with proteinsynthesis. However, these biological effects have not been proven hazardous. There is still no evidence that ELF fields cause or promotecancerous transformation of normal cells. Studies of laboratory animals exposed to ELF radiation have not shown any increased risk of cancer. Occupational studies of electrical workers have suggested an association with cancers, particularly leukemia and brain tumors. However, these studies are difficult to interpret because electrical workers are often

exposed to chemicals, solvents, and other carcinogens.... Human epidemiologic studies of ELF fields and cancer have been inconsistent and inconclusive." (Dec. 1992) [DH: Note theuse of the word "may" before "cause biological effects." Note that the Savitz 1995 study reverses the electrical worker data.]

III.8. Environmental Protection Agency's "Q&A about EMFs," (1992) states that "We are not sure if EMF exposure adversely affects human health." A call to the EPA-EMF hot line (1-800-363-2363) gets the same answer. The EPA ("Electric Power Lines: Q&A on Research into Health Effects") states: "Governmental reviews have concluded that existing scientific evidence, although suggestive, does not show that EMF cause cancer. These include national reviews by: an Advisory Board to the U.S. EPA, Advisory Panel to the Australian Minister of Health, National Radiological Protection Board of the UK, Danish Ministry of Health, French National Institute of Health and Medical Research, and reviews by the states of California, Texas, Connecticut, Illinois, Maryland and Colorado."

III.9. The Department of Transportation, in a series of reports on "Potential Health Effects... of ELF .... to Maglev and otherElectric Rail Systems" (DOT/FRA/ORD-93-31, plus others) does not make a connection between ELF and cancer, but cautiously says the knowledge is inadequate. Similarly, the Final Environmental Impact Statement, Vol. II on the Northeast Corridor Improvement Project Electrification -New Haven, CT to Boston, MA (Oct. 1994) concludes, "Few of the recent studies were able to estimate and control for other occupational exposures or personal factors that may affect the occurrence of cancer. Some of the studies were limited in their ability to assess an individual's lifetime exposures. None of the studies, including these recent studies using improved measures of EMF exposure, indicates an overall increase in total cancers, that is, all types considered together in electrical workers, or other exposed populations Consistent associations have not been reported for any specific type ofcancer and exposure to magnetic fields."

The DOT EIS states that EMF mitigation is part of their NE Corridor proposal (Vol. 1, p. 5-5): "The overhead catenary system and power transfer facilities design has been shown to minimize environmental EMF along the right-of-way in over a decade of operation powering the TGV system in France. The out-of-phase currents in the catenary and return feeder provide a partial magnetic field cancellation (except for the passengers in the current loop). At 30 feet from the track, the EMF due to this design is about half that produced by each overhead wire's current. In addition to EMF field reduction, this design offers EMF minimization atthe source. As a consequence, no specific changes are recommended in the overhead catenary design."

III.10. The Electric Power Research Institute states that $40 M was spent in 1993 from all sources on EMF research, its budget is about $10 M/yr. DOE and industry will spend $65M/5y. See Electrical and Magnetic Fields Research Abstracts (EPRI TR-104359, August 1994) for research projects.

III.11. P. Buffler, Dean, School of Public Health, University of California-Berkeley (UC-Berkeley Wellness Letter 11, 1, Nov. 1994): "In April, in a paper presented to the National Council for Radiation Protection, ... Buffler... highlighted the serious weaknesses of this [93-Sweden] and similar studies and pointed out how the results have been overblown and misrepresented.... Some scientists have proposed various sketchy theories to explain the dangers of EMF's, but none of these hypotheses has widespread support... the evidence so far certainly does not justify inordinate concern, let alone hysteria.... Some call this 'prudent avoidance,' but others say it is waffling. Carried to an extreme this policy could result in spending millions of dollars (passed on to us in higher energy rates and appliance prices) to avoid an unidentified or 'phantom' hazard, according to Buffler."

IV. Epidemiology and Cancer Data: (See Sec. III for panel reviews.)

IV.1. Recent Compilation of the Data: The December 1994 issue of IEEE Spectrum lists the references and results for 15 epidemiology studies before the recent 1995 Savitz/Loomis study. The first major study by N. Wertheimer and E. Leeper in 1979 triggered journalism that then created a large public response. These results are greatly discreditedby the totality of the 16 studies. The early results also were plaguedby the fact that they reported an association with power lines (wire codes) but they did not report an association with measured spot fields. It is necessary when comparing the data to separate the results of these study by cancer type. For example, consider the caseof three studies of electrical workers. The 1993 California study reported no association with either leukemia or brain cancer. The 1993 Canadian-French study reported an increase in leukemia, and a modest association with brain cancer. The 1995 Savitz/Loomis study reported no association with leukemia, but they did report an association with brain cancer. One has to look at the Savitz/Loomis data in Sec. IV.4 to gain some understanding for the statistics involved in making these judgments. [DH: The inconsistency in the results of these 16 studies is evidence of either a truly small or nonexistent risk, or else a measure of the confounders of different lifestyles, chemical exposures,etc.]

IV.2. Confounders and Causality: Epidemiological data can be biased by other factors, called confounders, for example data (Sci. Amer. 271 , 26, Dec. 1994) showing that "People of color -- defined by the report as the total population less non-Hispanic whites -- are currently 47 percent more likely than are whites to live near a commercial toxic waste facility." Other data (Science 267, 1269, 1995): "... social instability, as indicated by parental divorce, which correlates with a loss of 4 years from a person's life span." Since each epidemiology study will have different confounders, these effects, such as the socio-economic factor of living near a power line must be removed from the data. It is clear that a correlation and associations between epidemiology variables can be meaningful, but it does not prove causality.

[DH: These kinds of confounders are very important when one is examining relative risks of less than two for rarer death causes. The ELF epidemiology is further complicated by the fact that the dosimetry is usually not directly measured, and when dosimeters are used they usually do not determine the harmonic components as a function of time so important for Faraday's law of induction. Some ELFworkers have stated that it makes little sense to establish larger epidemiological studies beyond the "best" study of Savitz/Loomis because the lack of real dosimetry will make the studies of limited utility.]

IV.3. University of North Carolina Study on Electrical Workers Mortality (D. Savitz and D. Lomis, Amer. J. of Epidemiology 141, 123-134, 1995): "Reports of leukemia and brain cancer among men in electrical occupations suggest a small increase in risk, but most previous studies have failed to classify magnetic field exposure accurately or to consider potential confounders. The authors conducted an historic cohort mortality study of 138,905 men employed at five large electric power companies in the U.S. between 1950-86 with at least 6-months of work experience. Exposure was estimated by linking individual work histories to data from 2,842 workshift magnetic field measurements. Mortality follow-up identified 20,733 deaths based on 2,656,436 person-years of experience. Death rates were analyzed in relation to magnetic field exposure history with Poisson regression. Total mortality and cancer mortality rose slightly with increasing magnetic field exposure. Leukemia mortality however, was not associated with indices of magnetic field exposure except for work as an electrician. Brain cancer mortality was modestly elevated in relation to duration of work in exposed jobs and much more strongly associated with magnetic field exposure indices. Brain cancer risk increased by an estimated 1.94 per microtesla-year of magnetic field exposure in the previous 2-10 years, with a mortality rate ratio of 2.6in the highest exposure category. In contrast to other studies, these data do not support an association between occupational magnetic field exposure and leukemia but do suggest a link to brain cancer."

Savitz Data ($5M over 7 years):

Cause of Death	Observed Deaths	Expected Deaths	Mortality Ratio (+/- 95%)
All Causes	20,733	26,779.	5 0.77 (0.76-0.78)
All Cancer	4,833	5,515.	1 0.86 (0.84-0.89)
Brain/nervous sys	151	158.	4 0.95 (0.81-1.12)
Leukemia	164	217.	0 0.76 (0.64-0.88)

Leukemia Results: For leukemia, relative risk (vs. total exposure in mT-yr) from Savitz/Loomis: RR(mT-yr): 1.0(0-0.6), 1.28(0.6-1.2), 0.94(1.2-2.0), 0.72(2.0-4.3), 1.62(>4.3). Thus, Savitz conclusion of no association with leukemia is in agreement with the California study but in disagreement with the Canadian-French and 1993 Swedish studies.

Brain Cancer Results: Savitz quotes an RR of about 1.5-2.5 which is similar to the French-Canadian result of about 1.5, but in disagreement with the California and 1993 Swedish results of no association.

Savitz Press Release (1-11-95): "Although the most recent studies had found evidence that magnetic fields were related to leukemia, we did not.... The positive association between magnetic fields and brain cancer that we saw was stronger than had been seen in previous studies of electric utility workers..... It is disappointing that our results do not provide a clearer picture when combined with the previous studies of electrical workers and particularly electrical utility workers."

Washington Post, Jan. 12, 1995: "Savitz stressed yesterday that lethal brain cancers are rare -- occurring at a rate of about 6 per 100,000 persons in the general population -- and thus even a doubling of the risk does not pose a dramatic threat. 'I don't want to downplay the adverse aspects of our findings, but one thing our study does is show once again there is not some public health disaster lurking out there.'"

IV.4. Sweden (M. Feychting and A. Ahblom, Am. J. Epidemi. 138, 467-481,1993):

"For childhood leukemia and with cut off points at (average residential exposure) 0.1 and 0.2 mT, the relative risk (RR) increased over the two exposure levels and was estimated at 2.7 (95% c.i.: 1.0-6.3) for 0.2 mT and over.... For brain tumors or for all childhood cancers together there was little support for an association.... In adults and for magnetic fields of 0.2 mT and over, the RR for acute myeloid (AML) and chronic myeloid leukemia (CML) was estimated at 1.7 (0.8-3.5) and 1.7 (0.7-3.8)."

R. Wilson and A. Shiyakhter (Amer. J. of Epidemi. 1995) analyze (with humor) the Swedish Results: "... This suggests that there is an unusually large number of cases, leading to a larger risk ratio among the 262 (695-433) homes for which there were no spot measurements. This leads us to speculate that the failure to make a spot measurement might itself be associated with an increase in leukemia."

IV.5. Danish Study (J. Ohlson, Brit. Med. J. 307, 891-95, 1993):

"This study demonstrated that the risk of lymphatic cancer is increased among children with exposure to magnetic fields from high-voltage lines of 0.1 mT (1 mG) or greater. On the other hand, no increase in risk was found at this exposure level for either leukemia or brain tumor. For all three types of cancer combined an increased risk was also found at magnetic field exposures of 0.4 mT (4 mG) or greater, which corresponds to a residential distance of 25-50meters from the 'most powerful' transmission facilities."

G. Taubes (Science, 262, 649, 1993) quotes P. Buffler, the dean of the School of Public Health, University of California at Berkeley, who attacks the grouping of Danish data. [DH: Study used the crude power line distance parameter, and based on few numbers.]

IV.6. Finland (Bioelectromagnetics 14, 229-36, 1993)

".... 68,300 boys and 66,500 girls aged 0-19 years living....in magnetic fields calculated to be greater than 0.01 mT (0.1 mG) ... 140 cases of cancer were observed (145 expected; standardized incidence ratio 0.97, 95% confidence interval 0.81 to 1.1). No statistically significant increases in all cancers and in leukemia and lymphoma were found in child at any exposure level. A statistically significant excess of nervous system (brain) tumors was found in boys (but not in girls) who were exposed to magnetic fields greater than 0.2 mT (2 mG) or cumulative exposure of greater than 0.4 mT-years (4 mG-y)."

"Conclusions: Residential magnetic fields of transmission power lines do not constitute a major public health problem regarding childhood cancer. The small numbers do not allow further conclusions about the risk of cancer in stronger magnetic fields."

IV.7. Joint Canada/France Utility Workers (American Journal of Epidemiology, March 15, 1994). [DH: This study combined 3 separate studies and has some internal inconsistencies. Of the 32 cancer types examined, only two showed an association, which might be expected when considering so some many statistical linkages.]

"223,000 male utility workers... A significant association between exposure to EMF and leukemia and brain cancer has not been obtained.... Overall, combining all different cancer types, the study did not find any association between the cancer cases analyzed and electric or magnetic fields. Proceeding then to a separate analysis of 25 different cancers and 7 regroupings among these cancers, an association was found in only three. For these three cancer-type/regroupings, a link with cumulative exposure to magnetic fields was observed for acute non-lymphocytic leukemia (60 cases), including 47 cases of acute myeloid leukemia and atype of brain tumor known astrocytoma (41 cases). However, no relationwas found between length of exposure and effect: the results were inconclusive for astrocytoma, given the low number of subjects and the imprecision of the findings."

IV.8. Cancer Mortalities vs. Electrical Usage: J. D. Jackson; (Proc. Nat. Acad. Sci 89, 3508-10, 1992). "Total per capita power generation has increased by a factor of 10 since 1940, and per capita residential consumption has increased by a factor of 20 in the same period.... When respiratory cancers (largely caused by tobacco use) are subtracted, the remaining death rate has actually fallen since 1940." The Oak Ridge report points out that electrical power use has increased by nearly three orders of magnitude during this century. Some cancer mortality rates have risen, and others have fallen. Because of changes in cancer detection and medical intervention, it is difficult to make EMF totally blameless on the basis of the data. Nonetheless, because of the marked increase of electricity consumption (factors of 10, 20, 1000), it seems clear that EMF cannot be a significant cause of cancer. [DH: This paper has beenattacked because it does not determine if ELF causes cancer in small ways, and because wiring codes and

cancer detection processes have changed between 1940 and 1990. Nevertheless, this paper shows that ELF is not a significant health problem.]

IV.9. Brain Cancer Data: The NCI Surveillance, Epidemiology, and End Results (SEER) report of November 1994 and Science 267, 1414 (1995) give the changes in cancer rates between 1973 and 1991. For mortality rates, of the eight types that increased, brain cancer was ranked 6th with an increase of 0.7%/year, for incidence rates, brain cancer was ranked 7th at 1.2%/year. The rate of increase in the incidence in brain cancer is about the same as the rate of cancer incidence at all-sites. The total incidence and mortality rates for all forms of cancer are 390.4 and 172.8 per 100,000 persons, respectively. The leukemia and brain mortality rates are 7.6 and 4.8 respectively.

The NCI comments (May 1994): "Scientists believe a substantial part of the increase in brain cancer rates, especially in the older groups, is due to the advent of sophisticated scanning and imaging equipment, which are better able to detect brain tumors.... Factors shown to have a link to brain tumors, such as certain heritable conditions and childhood radiotherapy to the head, are uncommon and account for only a small percentage of the total number of cases."

V. Biology and Biophysics Experiments (see Section III for panel reviews):

V.1. Comments: In general these experiments use magnetic fields to "stimulate" a biological response, and not the electric field which is reduced by a factor of 108 in the human body. The views of biomedical-biophysics panels (Sec. III) and the research below do not show a link between ELF and cancer. [DH: I have asked the researchers that I called for evidence of such a link and they saidthere was no evidence. The review panels and others have pointed out that there is a problem with replicating the experimental results described below. Two of the main researchers I called stated that their work had only been "partially replicated."]

V.2. T. Teneforde (Ann. Rev. Publ. Health, 13, 173-196, (1992)) concludes the following: "Various different effects of ELF magnetic fields have been reported to occur at the cellular, tissue, and animal levels. Certain effects, such as the induction of magnetophosphenes in the visual system, have been established through replication in several laboratories. Many other effects, however, have not been independently verified or, in some cases, replication efforts have led to conflicting results. A substantial amount of experimental evidence indicates that the effects of ELF magnetic fields on cellular biochemistry, structure, and function can be related to the induced current density, with a majority of the reported effects occurring at current density levels in excess of 10 mA/m2. These effects, therefore, occur at induced current-density levels that exceed the endogenous currents normally present in living tissues. From this perspective, it is extremely difficult to interpret the results of recent epidemiological studies that have reported a correlation between cancer incidence and exposure to 50-Hz or 60-Hz magnetic fields

with very low flux densities. The levels of current density induced in tissue by occupational or residential exposure to these fields are, in nearly all circumstances, significantly lower than the levels found in laboratory studies to produce measurable perturbations in biological functions. There is a clear need for additional epidemiological research to clarify whether exposure to ELF magnetic fields is, in fact, causally linked to cancer risk. Laboratory animal studies conducted under controlled conditions are also needed to determine whether ELF magnetic fields can initiate or promote tumors. In addition, more studies of both a theoretical and experimental nature are needed to elucidate the molecular and cellular mechanisms through which low-intensity magnetic fields can influence living systems. A growing body of evidence indicates that cell membranes play a key role in the transduction and amplification of ELF field signals. Elucidation of the physical and biochemical pathways that mediate these transmembrane signaling events will represent a major advance in our understanding of the molecular basis of magnetic field effects on biological systems.

'Foster (Sec. III.4) concludes on the melatonin work: '..... Most employed fields far above environmental levels... In short, the health significance of these effects is unclear, and in several cases there is reason to question their existence. Given the dismal record for reproducibility of bioeffects....'

J. Stather of the UK National Radiological Protection Board comments (Science 267, 451, 1995): 'Although laboratory studies have suggested that electromagnetic fields can influence growth in both plant and animal cultures, the effects of such studies, 'when properly controlled,' have usually turned out to be inconclusive.'

EPA ("Electric Power Lines" Q/A on Research into Health Effects, Bonneville, May 1994): 'Some reported effects of 60-Hz EMF in laboratory studies: Increase in bone fracture-healing, avoidance of strong fields, decrease in the hormone melatonin, changes in stress hormones, field detection, slowing of human heart rate, changes in human brain activity, changes in tumor development, changes in white blood cell counts, temporary effect on growth, changes in behavior tests, changes in biorhythms, changes in functions of cells and tissues.' [DH: Note the verb reported means often unconfirmed, some disputed, and some are not replicated. Also, many of these experiments have been carried out at fields well above 10 mG.]

V.3. Animals: Honey bees follow B fields (Walker/Bitterman, J. Comp. Physiol. 157, 67-73,1995, and Science 265, 95,1994) down to a few mG DC accuracy and sea turtles turn when B varies at earth's locations (Science 264, 661 (1994). [DH: Note that detection of DC fields is not detection of AC fields, and it certainly is not cancer promotion. The honey bees are insensitive to AC fields.]

R. Goldberg (EMF Health Report 1 (1993): 'Results of these experiments [on animals] were predominately negative;there was a scattering of cancers among the animals, but no consistent pattern of tumors. The conclusion, by the majority of scientists doingthe studies, was that the tumors seen in animals exposed to EMF were due to chance alone.'

V.4. Montrose and Litovitz (Phys./Society 21, 7,1992) report changes in ornitine decarboxylase (ODC) enhancement in chick embryos with ELF. Adey in Battelle book discusses communication between cells through gap-junctions which are sensitive to low-frequency EMF. 'We hypothesize that cancer promotion with tumor formation may involve dysfunction at cell membranes, disrupting inward and outward signal streams.'

V.5. Magnetite in the Brain (J. Kirschvink et al, Proc. of Nat. Acad. Sci. 89, 7683, 1992): 'These magnetic and high-resolution transmission electron microscopy measurements imply the presence of a minimum of 5 million single-domaincrystals per gram for most tissues in the brain..... indicate the crystals are in clumps of between 50 and 100 particles.... Samples from seven brains were obtained from patients whose ages averaged 65 years... Subsamples for magnetic measurements were removed form the tissues by using similar tools in a magnetically shielded dust-free clean laboratory. Measurements of the ferromagnetic materials were made using a magnetometer employing Rf-biased SQUIDS.... 3-100 ng/g of magnetite..'

[DH: This work has only been partially replicated. See Sec. VI.3 for a discussion of the results. Kirschvink (Nature 374,123, March, 1995) appeals for researchers to have very clean rooms to avoid adding magnetic particles from the environment, thus nullifying their experiments.]

V.6. P. Valberg, 'Designing EMF Experiments: What's Required to Characterize Exposure?,' J. Bioelectromagnetics, 1995. 'Anyone who has attempted to organize and synthesize the resultsof research on biological effects of electric and magnetic fields (EMF) has experienced frustration when trying to evaluate the comparability of EMF exposures among separate studies.... To this end, a numerical listing of 18 separate parameters important to EMF exposure characterization is proposed... (1) Intensity of the magnetic field, (2) timing and duration of each EMF exposure, (3) repetition of exposure periods, (4) Circadian time of exposure, (5) frequency of field oscillation, (6) harmonic content, (7) intermittency, (8) turn-on and turn-off transients, (9) coherence in time, (10) circular and linear polarization, (11) relative orientation and magnitude of AC and DC magnetic fields, (12) spatial homogeneity, (13) superimposed electric fields, (14) Earth's magnetic field, (15) incidental, unplanned EMF exposure, (16) geometry of cell culture system, (17) size, number and movement of exposed animals, (18) accessory non-EMF exposure.

V.7. Bone Healing from EMF (C. Polk, Advances in Electromagnetic Fields in Living Systems, 1, 129-153 (1994)): 'Pulsed electromagnetic fields (PEMF) typically 'consist of 15 pulse bursts persecond. Each burst is 4.5 ms long and contains 20 magnetic field pulses. In each pulse the magnetic field increases from 0 to approximately 2 mT [20 G] during 200 ms, decrease to 0 again during 23 ms and is equal to 0 for 2 ms before the next 225 ms sequence

INEX # 95105

begins." Also, see the Bioelectric Repair and Growth Society, PO Box 64, Dresher, PA 19025 for more details. [DH: The fast rise times enhance the dB/dt by about a million with respect to 10 mG ELFs, to some 50 V/meter. The healing properties are not agreed to by all.]

V.8. Melatonin from the Pineal Gland; EPRI, EMF Laboratory Studies. Melatonin is a hormone produced by the brain's pineal gland and released to circulate in the bloodstream at levels that peak in nighttime darkness and decline in daylight. Laboratory evidence suggest that melatonin can, under some conditions, suppress the growth of hormonally sensitive cancers such as those in mammary tumors.... some studies show that 60 Hz electric fields and AC or rapidly inverting DC magnetic fields suppress nighttime melatonin production inrodents, but others have failed to reproduce these findings." [DH: Some dispute this work.]

V.9. Paramagnetic Resonances; C. Blackman, et al, Bioelectromagnetics 15 239-260 (1994): "Previous studies demonstrated that nerve growth factor (NGF)-stimulated neurite outgrowth (NO) in PC-12 cells can be inhibited by exposure to magnetic fields as a function of either magnetic field flux density or AC magnetic field frequency. The present work examines whether the PC-12 cell response to magnetic fields is consistent with the quasiperiodic, resonance-based predictions of the ion parametric resonance model (IPR).... The first set of tests examined the NO response in cells exposed to 45 Hz BAC from 77 to 468 mG(rms) at a BDC of 366 mG. Next we examined an off-resonance condition using 20 mG BDC with a 45 Hz AC field across a range of BAC between 7.9 and 21 mG(rms). Finally, we changed the AC frequency to 25 Hz, with a corresponding change in BDC to 203 mG (to tune for the same set of ions as in the first test) and BAC range from 78 to 181 mG(rms). In all cases the observed responses were consistent with predictions of the IPR model."

Adair (submitted to Bioelectromagnetics): "The data is far too consistent.... The extraordinary consistency of the data cannot be attributed to chance."

[DH: It is generally agreed that the theoretical model is incorrect. The data are only partially replicated.]

VI. Theoretical Mechanisms

VI.1 Theory I: C. Polk has calculated a variety of EMF situations; (IEEE Transactions 34, 243-249, 1991, and in CRC Handbook of Biological Effects of Electromagnetic Fields, Polk and Postow, eds.) The magnetic fields are determined from the currents, and the E-fields from the voltage:
-- Faraday's Law: E=wBr/2, J=sE. Using SI units, with B in Tesla, E in volts/m, 60 Hz, s=0.1 S/m, r=0.1 m, gives E=18.85 B and J=1.885 B. For a 1 mT field (10 mG), one gets E = 20 mV/m and J = 2 mA/m2.

-- E fields inside conducting media at 60 Hz, s=0.5, not grounded

E(internal)/E(air) = we0/s = 4 x 10-8, (0.7 x 10-8, Bennett)
Thus, it is the undiminished B field that is the important term.

Polk (Ch. X in CRC Handbook of Biomedical Engineering, J Bronzio, ed. CRC Press 1995): "Biological tissue and cells are obviously extremely complex media, they are not only extremely inhomogeneous and anisotropic, but also not in thermodynamic equilibrium (unless dead). Thus the application of physics laws to the explanation of field-tissue interactions becomes a very complex problem and the physicist and engineer must be careful not to provide "explanations", or to set limits on what should be "possible" or "impossible", based on physical models that are very far from even an approximate representation of biological conditions..... The experimental evidence existing at the present time is however insufficient to decide whether any of the more promising physical models that are discussed in the given references can provide an adequate explanation for any of the observed biological effects.... Uniform linear motion of an object, such as that of a walking human, in a nearly uniform magnetic field of about 50 mT will produce an induced "Lorentz" electric field proportional to the productof velocity and flux density. However that field cannot produce circulating electric currents as long as the total magnetic flux... does not change. Only tumbling motion,... could produce induced electric currents comparable in magnitude to those induced by a 1 mT [10 mG] 60 Hz field."

VI.2 Theory II: R. Adair has calculated various EM effects in Phys. Rev. A43, 1039-49 (1991), Physics and Society 19, 12-13 (1990) and Phys&Soc. 21, 8-10 (1992). Some of his results are: Thermal fluctuations lead to local electric Johnson--Nyquist "noise" fields from charge oscillations with rms values of

E(rms)2 = 4rkTdDn/d3,

Where r is the resistivity = 2, Dn is frequency span of 100Hz, d is the cell size 20 um. This gives E = 0.02 V/m, 3000 times larger than E from an external field of 300 V/m. J. Weaver (Science 247, 459-462,1990) uses Johnson-Nyquist to estimate 0.1 V/m for broad band detection.

Adair; limits on membrane rectification processes lead to very small currents: "Static magnetic fields smaller than the earth's field of 50 mT and varying fields weaker than 4-mT 60-Hz fields are equivalent in effect to that from walking in the earth's field, cannot be expected to generate significant biological effects. Moreover, the interactions of such weak fields at the cell level are also small compared to thermal noise. These conclusions would be modified by 60-Hz cell resonances. But such resonances are shown to be incompatible with cell characteristics and the requirement from equipartition that the mean resonance energy must be kT. Hence, any biological effects of ELF fields on the cellular level must be outside the scope of conventional physics." For E fields from time-varying B fields, the Faraday's law approach [with 500 mG] gives E = 0.001 V/m, as compared to a noise field value of 0.02 V/m. Cyclotron Resonance isruled out for the example of calcium to

refute Adey's data, "... the orbit [1 m] of such a resonance must be larger than the size of the cell by five orders of magnitude." (1011 collisions/second, P. Valberg)

T. Tenforde (Ann. Rev. Publ. Health 1992: 13, 173-96) disagrees by stating: "This theoretical treatment, however, neglects the considerable signal amplification that can occur in large arrays ofelectrically coupled cells in tissue. It also fails to consider nonequilibrium phenomena, such as cooperative transitions, through which extremely weak signals could exert significant effects on cell membrane properties." W. Bennett (Health and Low Frequency Electromagnetic Fields, Yale Univ. Press, 1994) disagrees with Teneforde on degree of signal amplification.

VI.3. Magnetite: Robert Adair (Proc. Nat. Acad. Sci. 91, 2925-29, 1994): "Previous calculations... are extended to consider multiple signals, the possibility of anomalously large magnetosome structures, and the possibility of anomalously small cytoplasm viscosities. The results indicate that the energies transmitted to the magnetite elements by fields less than 5 mT (50 mG).... will be much less than thermal noise energies. Hence, the effects of such weak fields.... cannot be expected to affect biology, or therefore, the health of populations."

Polk (Bioelectromagnetics 15, 261-270, 1994): "The numerical results indicates that predictions of this model depend strongly on the value selected for viscosity of the cytoplasm.....it seems premature to conclude.... 'that 60 Hz magnetic fields weaker than 5 mT (50 mG) cannot generate significant biological effects at the cell level through action on magnetic elements.."

Kirschvink (Phys. Rev. A 46, 2178-2184, 1992): "A biologically plausible model of the interaction of single-domain magnetosomes with a mechanically activated transmembrane ion channel shows that ELF fields on the order of 0.1 to 1 mT [1-10 G] are capable of perturbing the open-closed state by an energy of kT. As up to several thousand structures could fit within a eukaryotic cell, and the noise should go as the square root of the number of independent channels, much small ELF sensitivities at the cellular level are possible."

Bennett ("Cancer and Power Lines," Physics Today 47, April 1994, p. 23-29) calculates the physical basis for a variety of EM situations and concludes that "the dangers to human health from low-level ELF fields have been exaggerated beyond reason ....." See exchange of letters, Phys. Today 48, 13-15, 71-73, January 1995. Bennett (Phys. Today, p. 72, Jan. 1995) states "Any motion induced by a 60 Hz-field at the cell level will be strongly damped by viscosity effects. Few things are expected to have as large a collective magnetic interaction as a long chain of magnetic domains. For example, Joseph Kirschvink estimated from his model of the problem that it would take more than 1400 mG from 60-Hz field in the presence of cellular protoplasm to open an ion channel with a magnetite particle having a moment as large as 2 x 10-15 A m2 (about 34 domains). Such fields are enormous compared with those from power lines."

VI.4. Stochastic Resonance (SR) has been shown to be relevant in some electro-optics experiments, and it has been applied in various theories of climate change cycles and in biophysics problems. K. Wiesenfeld and F. Moss (Nature 373, 33-36, Jan. 5, 1995) and B. MacNamara and Wiesenfeld (Phys. Rev. A39, 4854-69, 1989) state: "But recent research has established that noise can play a constructive role in the detection of weak periodic signals, via a mechanism known as stochastic resonance. In essence, SR is a nonlinear cooperative effect in which a weak periodic stimulus entrains large-scale environmental fluctuations, with the result that the periodic component is greatly enhanced." These authors have measured SR-like responses of cray fish mechanoreceptors hair cells that follow a SR-like curve. They conclude: "If SR is relevant, the effect of weak, extremely low frequency electromagnetic fields might be greatly amplified. Whether any such enhancement is large enough to have significant biological ramification is at this state purely speculative."

"... the presence of random noise alone is sufficient to induce (irregular switching) between the wells. In the high-friction limit, the dynamics can be modeled by the differential equation

$$dx/dt = -dU/dx + F(t) + A \sin(wt)$$

where U is the bare potential, A sin(wt) is the signal, and F is the noise..... Remarkably, theories for all three types of SR -- the bistable potential model, the fire and reset excitable system model, and the simple threshold model -- result in the same general formula (apart from some constant factors of order one in both the prefactor and the exponential) for the Signal to Noise Ratio (SNR):

$$SNRout \; a \; (eDU/D)2 \exp(-DU/D)$$

where e is the input signal strength, D is the input noise intensity and DU is a constant related to the barrier height or the threshold."

Adair points out that the SNR above is the output SNR ratio, signal out over noise out. Thus if one divides both sides of the equation by SNRin, (e/D), one obtains

$$SNRout/SNRin \; a \; (eDU2/D) \exp(-DU/D).$$

Adair comments: "However, if the input signal is much smaller than the input noise, the output signal-no-noise ratio will be even much smaller.... where an electromagnetic field signal is much smaller than the thermal noise.... SNRin <<1...." Adair further points out in a comment on chaos that the flapping of the butterfly in Irkusk might change the day it snowed in New York, but it wouldn't change the average climate.

VI.5. F. Barnes (Bioelectromagnetic Supplement 1, 67-85, 1992): "There have been a number of hypotheses presented (4 ref.), but thus far, it has been difficult to get definitive measurements that either confirm or reject these theories.... Additionally, three models by which a biological system may extract weak signals from noise are presented. The first of these is the injection-locking of oscillating processes where the signal to noise ratio may be less than unity. The second is parametric amplification which allows the external signal and the biological process to be at different frequencies and where stability requirements on the external pump frequency discriminates against the noise. The third approach is to examine a computer model for a neural network which can be trained to identify a 60 Hz field at signal-to-noise ratios much less than one. The key to each of these models for possible interactions of magnetic fields with biological systems is the long-term coherence of the signal with respect to the noise."

VII. Prudent Avoidance and ELF Mitigation Costs.

VII.1 Prudent Avoidance: The vague concept of "Prudent Avoidance" has been used by at least eleven utility commissions to promulgate regulations on ELF because the science connection between EMF and cancer has not demonstrated. G. Morgan defines (Public Utility Fortnightly, March 15, 1992 and EMF Fields from 60 Hz Electrical Power, Carnegie Mellon, 1989) "prudent avoidance" as: "Prudence means exercising sound judgement in practical matters. It means being cautions, sensible, not rash in conduct." Morgan further states that prudent avoidance "is to try to keep people out of fields when that can be done at modest cost -- but not to go off the deep end with expensive controls which may not be benefical." This seems reasonable, but from there he moves towards the arbitrary spending without measureable benefits by stating: "Utilities and utility regulators must consider both distribution systems and transmission systems. Activities that may warrant consideration at the distribution level include: paying greater attention to population distributions around facilities; incorporating more consideration of exposure management in maintenance and facility upgrade policies.... making selected use of undergrounding..."

[DH: Thus, prudent avoidance opens the political path for the utilities and other bodies to spend money without a scientific basis for concern. This seems all the more irrational since there is no convergence on the epidemiology data on what to fear, and there is no consensus on whether the concern is (1) the intensity of the fields, (2) the frequency windows which might cause resonance, or (3) the rate of change of the fields (Faraday's law). In our free society, this open-ended, unbounded approach to risk mitigation allows a fearful public to use the threat of litigation to remove the "phantom effect." As long as the rate payers and others will cover the costs, the utilities and others have little incentive to take on litigation in this area.]

[DH: Morgan's approach appears to be driven by his statement that "there is some significant chance that fields pose a modest public health risk, and not much chance that the risk to any one of us will be very big." In my analysis of Morgan's work, he seems to have placed great reliance on well known discredited work, stating in 1992 that "a series of epidemiological studies, including studies of childhood leukemia by

Nancy Wertheimer and Ed Leeper... have provided a growing basis for concern." In addition, Morgan has failed to examine the risk factors by type of cancer, an approach which shows glaring inconsistencies. Lastly, his writings should be updated to take into account the new work of Savitz and others. Philosophically, Morgan alludes to Thomas Kuhn's Structure of Scientific Revolutions, stating that "paradigm shifts" are affecting "scientific thinking about biological effects from electric and magnetic fields." It is premature to talk of paradigm shifts when the preponderance of the data base does not converge on a cancer pathway or on the degree of risk. Morgan's is concerned that public perceptions may drive regulations rather than scientific fact, but yet I conclude that it his own papers which have pushed the ELF-risk process away from science and towards irrationality. I agree with the critics of "prudent avoidance" who have call it "the abandonment of science, "the triumph of fear of the unknown over reason," and "being so vague as to be useless." In the real world of the courts, the public utility commissions, and the city councils, this approach makes for regulation by fear and without substance. Prudent avoidance is a delight for plaintiff lawyers since it is essentially a conclusion that the danger is probable.]

VII.2 Utility Regulations (GAO Report on EMF, GAO/RCED-94-115): "Regulators in at least 11 states that we contacted have adopted practices for mitigating exposure to EMFs.... Some commercial utilities have also adopted prudent avoidance or other 'low cost/no cost' policies to address the public's concerns about EMFs. Such policies are not based on scientific knowledge about health effects of exposure to EMFs."

VII.3. IRPA/INIRC: The public standards for ELF are driven by the fact that "Twenty of these (pacemaker) units reverted to an asynchronous mode or exhibited abnormal pacing characteristics in 60-Hz fields with amplitudes ranging from 0.1 to 0.4 mT (1-4 G)." (T. Teneforde, Ann. Rev. Publ. Health 13, 173-196, (1992)). The International Non-Ionizing Radiation Committee of the International Radiation Protection Association developed the following interim guidelines in 1990 for ELF fields which are much higher than the fields from power lines:

Occupational: "Continuous occupational exposure during the working day should be limited to rms magnetic flux densities not greater than 0.5 mT (5 G). Short term occupational whole-body exposure for up to 2 h per workday should not exceed a magnetic flux of 5 mT (50 G). When restricted to the limbs, exposures up to 25 mT (250 G) can be permitted."

General Public: "Members of the general public should not be exposed on a continuous basis to unperturbed rms magnetic flux densities exceeding 0.1 mT (1 G). This restriction applies to areas in which members of the general public might reasonable be expected to spend a substation part of the day. Exposure to magnetic flux densities between 0.1 and 1.0 mT (rms, 1-10 G) should be limited to a few hours per day. When necessary, exposures to magnetic flux densities in excess of 1 mT (10 G) should be limited to a few minutes per day."

VII.4. ELF Mitigation Costs from H. Florig, co author of prudent avoidance concept ("Containing the Costs of the EMF Problem," Science 257, 468-9, 488, 490, 492 (1992):

"... it seems likely that the total economic cost of the [ELF mitigation] activities described above now exceed $1 billion annually, with the promise of growing costs in the years to come.... If we were to value the reduction of a unit of EMF risk at comparable levels, the most that we could justify spending on EMF mitigation would be something in the neighborhood of $10 billion per year.... Given that the utilities nationwide invest about $13 billion annually in transmission and distribution construction, the cost of these exposure-reduction practices could well exceed $1 billion per year if widely adopted."

"Recent examples include a town that moved several blocks of distribution lines underground at a cost of $20,000 per exposed person; a utility that rerouted an existing line around a school at a cost of $8.6 million; a new office complex that incorporated EMF exposure in its design at a cost of $100-200 per worker; and a number of firms that have installed ferrous shielding on office walls and floors to reduce magnetic field exposures form nearby power handling equipment at costs ranging up to $400 per square meter of office space."

D. A Bromley, President Bush's Science Advisor, comments on in his book, (The President's Scientists Yale University Press, 1994) on a ELF study done in the Office of Science and Technology Policy: "It is safe, however, to conclude that the EMF risk issue will continue to be contentious and of immense potential economic importance; the current best estimate is that prior to 1993 it has cost the American public more than $23 billion to respond to public worries about EMF -- particularly in connection with the placement of high-voltage power lines."

W. Horton and S. Goldberg, (Power Frequency Magnetic Fields and Public Health CRC Press, 1995) describes the many mitigation measures available. Extra costs of about 10% are allocated for such measures.

VII.5. GAO ELF Mitigation Costs (Electromagnetic Fields, GAO/RCED-94-115):

- $90,000/mile for delta design above-ground wiring (45% ELF reduction)
- $2 million/mile, burying line in fluid-filled steel pipe (99% ELF reduction)
- $1 billion for new transmission lines right-away (<0.01mT, 0.1G)
- $3-9 billion for grounding for new grounding systems
- $200 billion, burying trans. lines nationwide, avg. <0.1mT=1G
- $250 billion to reduce avg. exposures from all lines to <0.2mT=2G, from horizontal phase to delta configuration and other means.

VII.6. EMF Litigation: EMF Timeline is a chronology of legal and political EMF battles, such as "San Diego utility SDG&E cancels power plant upgrade and compromises on 69-kV line (May 5, 1994). Recently a law suit was filed against Houston Light and Power and EPRI on behalf of eleven families with children suffering from cancer. The suit charges both the power company and EPRI with "fraudulent concealment of the carcinogenic nature of the fields that secretly and silently invaded their homes." In San Luis Obispo, California, the city planners have used ELF criteria to resite a building.

MFX # 95105

EMF Heath Report (Vol. 1, 1993, http://infoventures.microserve.com): The utilities "are taking costly preventive measurements to avoid law suits, mindful of the mass tort assaults against asbestos manufactures. For example one utility, Hawaiian Electric Industries, Inc., spent nearly $5 million to reroute and reconfigure power lines.... At Montague Elementary School in Santa Clara, CA, 13 of the schools' 15 teachers have formally requested to be transferred because of the school's close proximity to power lines. In addition, 4 classrooms, a day care center, and a part of the playground located near power lines have been closed by the Mill Valley School District."

IEEE Spectrum (December 1994): "The World Bank.... is now considered to be a model in this area. The policy of prudent avoidance added about $500,000 to its construction costs...the California Public Utility Commission required utilities to reduce the existence of EMF.... defined as 4 percent of the total cost of the budgeted project." Also, see E. Gerjuoy, Jurimetrics 35, 55-75,1994.

[DH: Litigation for ELF could be substantial, but probably not as large as the hundreds of thousands of asbestos claims that have been filed. The effects will probably be more subtle than direct litigation in that the public utility commissions, environmental impact statements, companies, city councils, and school districts will respond to the pressure to mitigate and to avoid litigation.]

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Applicant Comment Set 2

June 2, 1995

Julie Halligan, California Public Utilities Commission
Peter Humm, U.S. Bureau of Land Management
% Aspen Environmental Group
30423 Canwood Street, Suite 218
Agoura Hills, CA 91301

RE: Alturas Transmission Line Project

Dear Ms. Halligan and Mr. Humm:

We respectfully submit these additional comments to the Visual Resource Section of our technical comments on the EIR/S sent June 1, 1995.

Sierra Pacific Power Company (Sierra Pacific) felt compelled to undertake its own photo simulations of KOP3; KOP4 and KOP9. These photo simulations were done in an effort to verify what we perceived as a misrepresentation of the visual impacts in the Draft EIR/S.

The following process was used to develop the enclosed photo simulations:

a. Helium balloons, at heights equal to the structure height, were placed on centerline at preliminary structure locations.

b. Color photos were taken, as close as possible, at the same key observation points used in the Draft EIR/S.

c. Envision Design of Reno scanned the photos into a computer readable format using a Microtek scanner.

d. Photos of existing tower similar to those proposed for the Alturas project were also scanned into the computer.

A: 2-1

e. Using the Adobe Photoshop computer program, the tower image was scaled within the photograph to match the location and height indicated by the balloons.

f. The resulting photo simulations are survey scale accurate for location, height and structure dimension.

A: 2-1

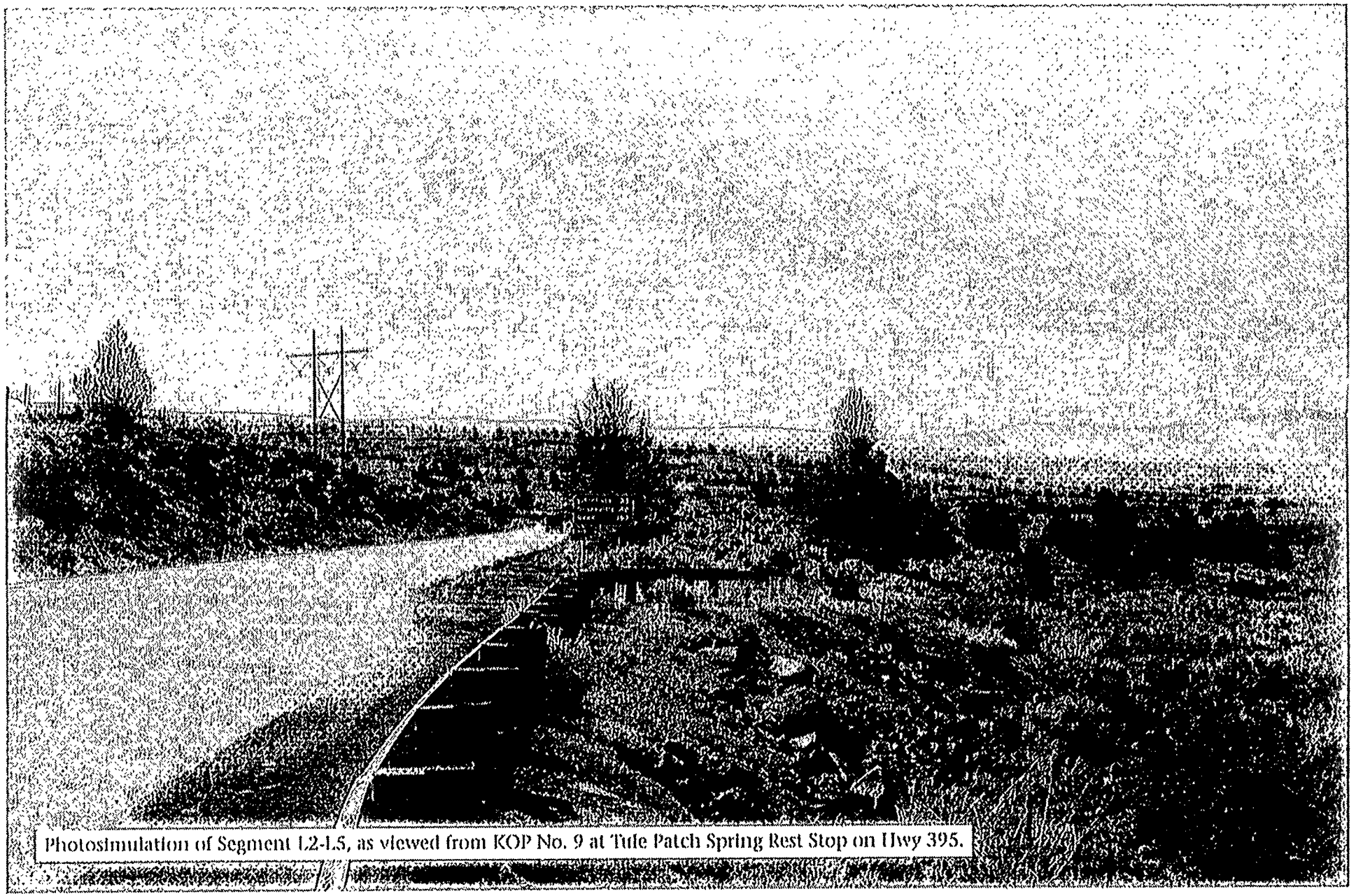
Your consideration of our concerns, and incorporation of the changes in the Final EIR/S, are very important to Sierra Pacific. Thank you for your time and consideration of these comments.

Sincerely,

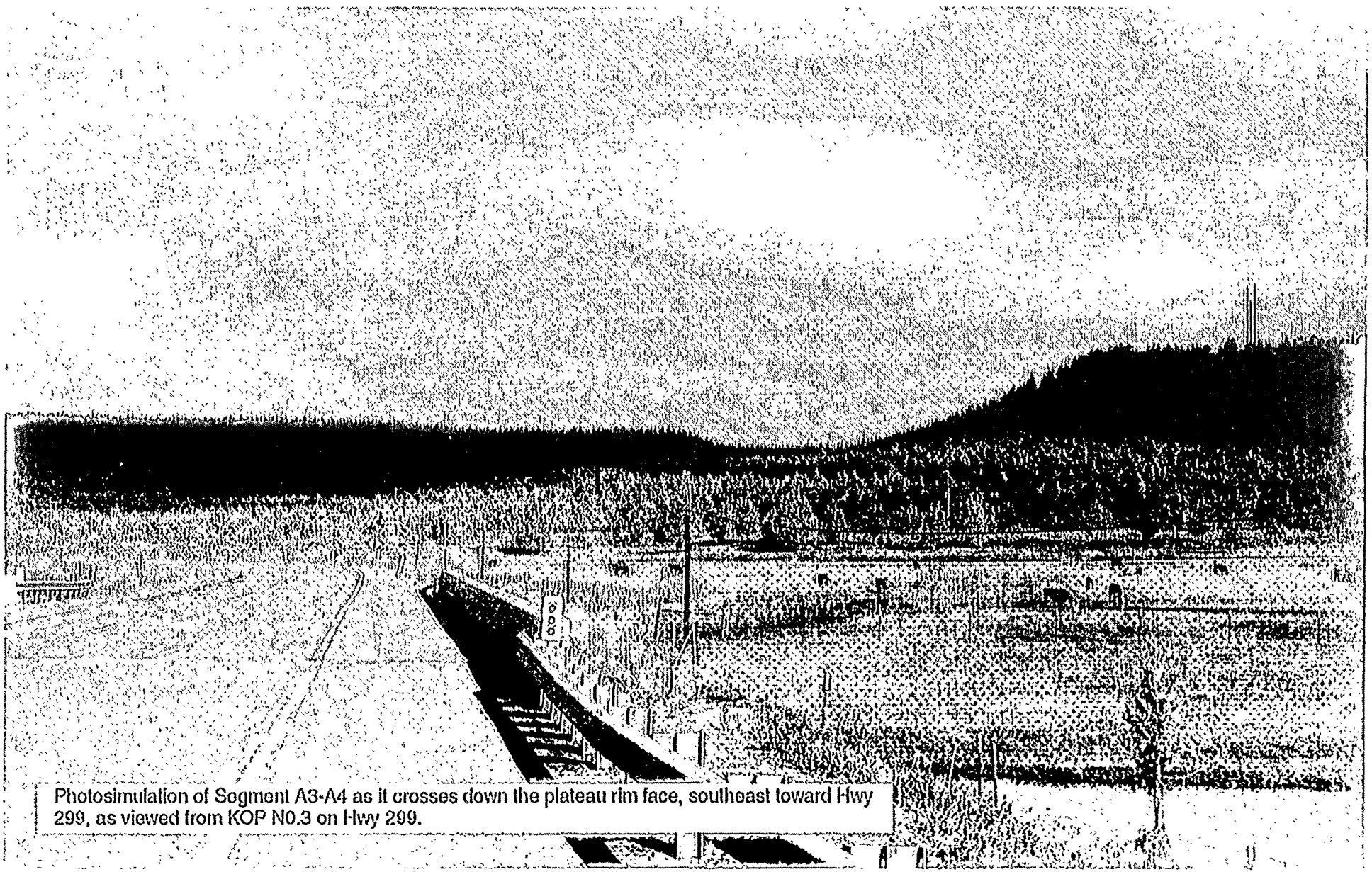
Stephen P. Younkin
Project Manager, R/W & Permitting

SPY:lj

Attachments



Photosimulation of Segment L2-LS, as viewed from KOP No. 9 at Tule Patch Spring Rest Stop on Hwy 395.



Photosimulation of Segment A3-A4 as it crosses down the plateau rim face, southeast toward Hwy 299, as viewed from KOP N0.3 on Hwy 299.

Photosimulation of Segment A3-A4 as it crosses Hwy 299, as viewed from KOP No.4 on Hwy 299.