PART H. RESPONSES TO COMMENTS

Every comment included in Volume II has a corresponding response presented in this section. Consistent with the presentation of comments in Part G, the responses are grouped by type (e.g., General Public, Organizations and Citizen Groups, Elected Officials, Public Agencies, and Applicant) and are listed in chronological order by their set number and comment number. Refer to Part G for the text of a given comment and Part H for its response.

H.1 RESPONSES TO COMMENTS FROM THE GENERAL PUBLIC

SET # GP.1 PAUL HERMAN

GP.1-1 Please see revised definition of wheeling in Section A.6 of the Final EIR/S.

GP.1-2 Section A.6.5 discusses that without the Proposed Project, failure of an existing SPPCo 120 kV transmission line is projected based on anticipated growth, thus resulting in line damage or an interruption of service to the Reno/Lake Tahoe area. Section A.6.2 of the EIR/S discusses SPPCo's current wheeling limitations because of existing import capability restrictions and future service reliability concerns based on projected growth. Section A.6.4 discusses the wheeling benefits resulting from the Alturas Transmission Line. By increasing the import capacity of SPPCo's system, the Proposed Project will increase wheeling opportunities. See revisions to Section A.6.2 of the Final EIR/S elaborating on the wheeling limitations and benefits resulting from the Proposed Project.

GP.1-3 The 200-foot-wide right-of-way (ROW) for the Los Angeles Department of Water and Power (LADWP) 1000 kV transmission line was granted by the Bureau of Land Management in 1967. Since the LADWP ROW was granted prior to the adoption of the National Environmental Policy Act (NEPA) (adopted in 1969), no environmental review was conducted prior to the granting of the ROW. In addition, prior to the mid-1970's, no consideration was given by the federal government to the concept of utility corridors. Utility route selection revolved around the theory that the most viable and economic routing choice was a straight line between the source and the delivery point (Western Utility Group, 1992).

Federal utility corridor planning began in 1975 with the publication of the "*The Need for a National System of Transportation and Utility corridors*" by the U.S. Department of the Interior. This report established that federal agencies were expected to become more active participants in utility route selection and noted that planning for specific, rigidly defined corridors is infeasible without project-specific information.

In 1977, the Western Utility Group (WUG) was formed, an ad hoc organization of representatives from primarily investor-owned electric, gas, water, and communication utilities. By 1979, restrictions on land uses were being enforced throughout the United States and preparation of the first federal land use plans had begun. However, many of the first land use plans did not address the issue of utility corridors. The WUG recognized that these newly created federal land use designations, combined with the lack of utility

corridor designations in the federal land planning process, could constrain the utility industry's ability to maintain energy and communication systems. The WUG approached the BLM and U.S. Forest Service (USFS) with these concerns, and in turn, the WUG, BLM, and USFS worked cooperatively on the preparation of the 1980, 1986, and 1992 Western Regional Corridor Studies. These studies present the existing and proposed utility corridors as identified by the WUG. The BLM and USFS utilize the corridor studies as reference documents in the development of Land Management Plans and Forest Plans, respectively, and when considering land use decisions.

The portion of the LADWP 1000 kV transmission line ROW that would be paralleled by the Nevada Alternative travels primarily through BLM lands. The BLM has "designated" the LADWP ROW as a corridor. Section 2800.0-5l of Title 43, Code of Federal Regulations, defines a designated corridor as follows:

> *Designated right-of-way corridor means a parcel of land either linear or areal in character that has been identified by law, by Secretarial Order, through the land use planning process or by other management decision as being a preferred location for existing and future right-of-way grants and suitable to accommodate more than 1 type of right-of-way or 1 or more rights-of-way which are similar, identical or compatible;*

Section 2801.1.12A of the BLM Manual cites the following:

> *Designation of Right-of-Way Corridors Without Further Review. An existing transportation and utility corridor may be designated as a designated right-of-way corridor without further review as provided by Section 503 of FLPMA. Existing transportation and utility corridors shall be assumed to be suitable as designated right-of-way corridors unless there is factual information to the contrary.*
>
> *1. Uses. Existing transportation and utility corridors may be designated without further review only for existing and any potential additional compatible uses. For example, an existing corridor currently used for highway, railroad, and electric transmission purposes may be designated for these uses as well as for oil and gas pipelines, canals, or communication purposes.*
>
> *2. Notification. If high interest is anticipated, the public and holders shall be notified when designating existing transportation and utility corridors without further review.*
>
> *3. Documentation. An existing transportation and utility corridor designated without further review requires a short written statement signed by the authorized officer.*

Section 503 of the Federal Land Policy and Management Act of 1976 (FLPMA) stipulates the following:

> *.... In designating right-of-way corridors and in determining whether to require that rights-of-way be confined to them, the Secretary concerned shall take into consideration national and*

State land use policies, environmental quality, economic efficiency, national security, safety, and good engineering and technological practices. The Secretary concerned shall issue regulations containing the criteria and procedures he will use in designating such corridors. Any existing transportation and utility corridors may be designated as transportation and utility corridors pursuant to this subsection without further review.

Section B.3.4.6.2 has been revised in the Final EIR/S (Section C.14 in the Draft EIR/S) to elaborate on the various factors taken into consideration on the LADWP corridor alternatives, including the Nevada Alternative. See, also, response to comment GP.14-11.

The Silver Lake and Stead Substations are 60 kV to 24.9 kV distribution substations, respectively, which are currently connected to the Valley Road Substation via two 60 kV transmission lines. These transmission lines would be inadequate as a connection for the southern terminus of the Alturas Intertie. To use either of these substations would require a 345 kV transmission interconnection between the selected substation and the North Valley Road Substation. Land and communication facilities at the Silver Lake and Stead Substations are insufficient to support the 345 kV facilities required for such a termination. The Stead Substation site is a 1.6-acre triangular plot of land that is boxed in by roads on two sides and by a building on the third side. The Silver Lake property is a 1.15-acre rectangle that is adjacent to a railroad and two commercial buildings. The Proposed Project termination requires approximately seven (7) acres of land, as reflected by the sizing of the Border Town Substation and North Valley Road Substation expansion (acreage estimate does not include access roads or landscaping).

Additional restrictions resulting from existing commercial and residential developments, and recreational uses (Reno National Championship Air Race course) would make the necessary routes into and out of the area improbable.

The discussion of underground transmission lines has been expanded to include a description of technologies available and possible environmental impacts resulting from operation of underground systems (see Section B.3.4.5 in the Final EIR/S).

GP.1-3B Section B.3.4.4, System Enhancement Alternatives - Demand Side Measure Alternative, discusses the SPPCo programs in place to reduce customer energy consumption and to what extent these programs satisfy the objectives of the Proposed Project. As presented in Section B.3.4.4, the conservation programs (offering a savings of approximately 11 MW during peak winter and summer demand) were considered by SPPCO as being in place in their projections of future demand. Table A-3 presents SPPCo's actual and forecasted demand by year, and winter and summer peaks. The 11 MW savings offered by the conservation programs represents an approximate 1% reduction in winter and summer peak demands (1099 MW and 1130 MW, respectively, in 1994) and is therefore insufficient in satisfying the project objectives.

GP.1-4 Additional consideration has been given to alternative routes east of Petersen Mountain and the results are presented in revised Section B.3.4.1 in the Final EIR/S.

Additional consideration has also been given to the comparison between alternatives within Long Valley, particularly Proposed Segment T versus Alternative Segments S and U, and the results are presented in the revised Part D of the Final EIR/S.

GP.1-5 Comment noted. The No Action (No Project) Alternative is considered in the EIR/S, particularly in Section B.4.3, throughout Part C (subsections C.x.4 for each environmental issue area), and in Part D (Comparison of Alternatives). Also, see responses to comment GP.1-3. As discussed in Section F of the EIR/S, a Mitigation Monitoring, Compliance, and Reporting Plan would be developed for the Proposed Project to ensure that recommended mitigation measures are implemented as intended.

SET # GP.2 JAMES C. HETHERWICK

GP.2-1 Comment noted. The EIR/S for the Alturas Transmission Line Project discusses the impacts of constructing and operating the Proposed Project across 12 issue areas, including, but not limited to, biology (Section C.3), visual/aesthetics (Section C.13), electric and magnetic fields (EMF) (Section C.10 - Public Health & Safety), and property values (Section C.11 - Socioeconomics). Mitigation measures are also proposed to reduce or eliminate the impacts of the project on all issue areas. The Impact Summary Tables in the Executive Summary summarizes the Class I impacts of the project (impacts that are significant even with mitigation). All Class I impacts identified, including land use and visual impacts, would result from the presence of the project after it is constructed. These impacts will be considered when the Lead Agencies make their final decision on the Proposed Project.

The EIR/S also discusses several alternatives to the Proposed Project that would route the transmission line primarily through Nevada (see Section B.3.4.6.2 of the Final EIR/S). One of these alternatives, the Nevada Alternative, would probably originate on the east side of Alturas near the BPA Warner Substation. The alternative would proceed eastward across the Warner Mountains, through the Cedarville area, and across Surprise Valley to the California-Nevada border. Section B.3.4.6.2 discusses that within Modoc County this alternative would likely traverse many more private properties, placing more residences in close proximity to the lines as compared to the Proposed Project. In addition, within Modoc County, additional biological impacts are expected since the alternative would probably need to traverse the highly sensitive wildlife corridor between the north fork of the Pit River and Dorris Reservoir.

Other alternatives are also presented in the EIR/S that would originate in eastern Nevada or Oregon. Since these alternatives (or some combination thereof - see Table B-12 of the Final EIR/S) would need to traverse northern Sparks and Reno for ultimate connection to SPPCo's North Valley Road Substation, residential areas with densities of 3 to 21 dwelling units would need to be traversed (if existing utility corridors are followed). Therefore, it was concluded that these alternatives did not offer environmental advantage to that of the Proposed Project because of potential significant property owner constraints, EMF concerns and potential land use, visual, and air quality impacts.

GP.2-2 Comment noted. Land owners will be compensated for land or easements acquired for the project right-of-way. Mitigation Measure S-1 in the Final EIR/S describes a procedure for

minimizing potential property value impacts for parcels deemed to be subject to a significant, unavoidable Class I land use or visual impact. Please see response to comment GP.2-1.

SET # GP.3 LAVERNE AND ROBERT MCDONNELL

GP.3-1 For many of the reasons discussed in this comment, Proposed Segment Q is considered to be environmentally superior to Alternative Segment P, and is the BLM-preferred alternative (see Section D.2.1, which has been revised for the Final EIR/S).

SET # GP.4 BARBARA WILLIAMS

GP.4-1 Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as a joint utility corridor for the Proposed Project.

Section C.10 discusses the electric and magnetic field (EMF) impacts of the Proposed Project. As illustrated on Figure C.10-4, the electric field value at the edge of the project right-of-way (80 feet from transmission line) would be 1.8 kV/m for a 345 kV H-frame configuration. The magnetic field values for normal and peak loading scenarios would be 10 mG and 17 mG, respectively, at the edge of the right-of-way (80 feet from transmission line) for a 345 kV H-frame configuration (see Figure C.10-8). In the Long Valley area, 345 kV H-frame configurations would be constructed. Table C.8-1 presents the residential land uses within 2000 feet of the Proposed Project centerline. As presented in Table C.8-1, in the Long Valley/Honey Lake Valley area, the closest residence to the project centerline would be 500 feet away. When referring back to Figures C.10-4 and C.10-8, the electric and magnetic field values at 500 feet from the project centerline would be less than 0.1 kV/m and less than 2.0 mG (normal and peak loading), respectively. At a distance of 500 feet, the electric and magnetic field values are comparable to those of common household appliances (see Tables C.10-1 and C.10-2).

Section C.3.2.2.3 presents the impacts of the Proposed Project on wildlife migratory patterns, Section C.11.2.2.3 and response to comment GP.2-2 discuss property value impacts, and Section C.13.2.2.4 discusses visual impacts imposed by the project in the Long Valley area (Section C.13.3.7 presents the visual impacts of Long Valley alternative segments). Mitigation measures are also presented in each of these sections to reduce or eliminate the impacts identified. The Impact Summary Tables in the Executive Summary summarizes the Class I impacts of the project (impacts that are significant even with mitigation). All Class I impacts identified, including land use and visual impacts would result from the presence of the project after it is constructed. These impacts will be considered when the Lead Agencies make their final decision on the Proposed Project.

SET # GP.5 FRED AND VIVIAN URBANEK

GP.5-1 Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as a joint utility corridor for the Proposed Project.

Section C.9.2.3 discusses the noise impacts of the Proposed Project, Section C.10.2.3.1 presents electric and magnetic field impacts, and Section C.13.2.2.4 discusses visual impacts imposed by the project in the Alturas area (Section C.13.3.1 presents the visual impacts of the Alturas alternative segment). Mitigation measures are also presented in each of these sections to reduce or eliminate the impacts identified. The Impact Summary Tables in the Executive Summary summarizes the Class I impacts of the project (impacts that are significant even with mitigation). All Class I impacts identified, including land use and visual impacts would result from the presence of the project after it is constructed. These impacts will be considered when the Lead Agencies make their final decision on the Proposed Project.

SET # GP.6 PATRICIA WILLIAMS

GP.6-1 Comment noted. The EIR/S identifies the impacts of constructing and operating the Proposed Project. With the implementation of mitigation measures identified in the EIR/S, many of the construction impacts of the project could be reduced to an insignificant level (**Class II**). A Mitigation Monitoring, Compliance and Reporting Plan (see Part F) shall be developed prior to project construction to ensure that mitigation measures are implemented as intended.

Also, the Impact Summary Tables in the Executive Summary summarizes the Class I impacts of the project (impacts that are significant even with mitigation). All Class I impacts identified, including land use and visual impacts would result from the presence of the project after it is constructed. These impacts will be considered when the Lead Agencies make their final decision on the Proposed Project.

In accordance with the California Environmental Quality Act and the National Environmental Policy Act, the EIR/S for the proposed Alturas Transmission Line is being prepared to disclose to the public and decision makers the environmental impacts of constructing and operating the Proposed Project. The California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM) will consider the impacts identified in the EIR/S when making their decision on project approval or denial. The CPUC and BLM are expected to make their decisions on the Proposed Project during December 1995. See Sections A.3 and A.4 for a complete description of how the CPUC and BLM utilize the EIR/S in their decision making processes.

SET # GP.7 TERRY A. TRUMBULL

GP.7-1 Comment noted. The Draft EIR/S Mailing List has been updated to reflect your correct name and address.

Section C.11.2.2.3 of the Draft EIR/S and response to comment GP.2-2 discuss the impacts of the Proposed Project on property values.

SET # GP.8 EARLIE AND MARY BROWN

GP.8-1 A93-11-018 is the CPUC application number for Alturas Transmission Line Project. CACA-31406 is the BLM Case Number for the same project.

GP.8-2 See response to comment GP. 2-1 for a discussion of project construction and operation impacts. Recreational and agricultural impacts are discussed in Section C.8.2.2.1 of the EIR/S.

As presented in Table C.8-1, all residences within the vicinity of the Proposed Project would be at least 300 feet away from the transmission line (the exceptions are a single-family residence on Segment L and an apartment complex on Segment X). As presented on Figures C.10-3 through C.10-10 in the EIR/S, the electric and magnetic field values at 300 feet from the project centerline would be less than 0.1 kV/m and less than 2.0 mG (normal and peak loading), respectively, for all structure configurations (230 kV vs 345 kV, single-pole vs. H-frame). At a distance of 300 feet, the electric and magnetic field values are comparable to common household appliances (see Tables C.10-1 and C.10-2).

GP.8-3 It is common practice in the United States and other industrialized nations to site various utilities within the same corridor, including transmission lines and gas, water, sewer, oil, and product pipelines.

GP.8-4 Section C.11.2.2.3 of the EIR/S discusses the impacts of the Proposed Project on property values, and response to comment GP.2-2 addresses property compensation.

GP.8-5 The comment regarding opposition to the location of the Proposed Project is noted. Please see Section C.10 (Public Safety and Health) of the EIR/S regarding the impacts of electric and magnetic fields (EMFs) on public health, and the risk of shocks, fuel ignition, fire, and exposure to hazardous materials during project construction and operation. The overall conclusion of this analysis is that the risk to public health and safety associated with constructing and operating the Proposed Project would either be non-significant or could be reduced to a level of non-significance if specific mitigation measures are implemented.

GP.8-6 See response to comment GP. 2-1 for a discussion of project construction and operation impacts. Section C.11.2.2.3 of the EIR/S and response to comment GP.2-2 discuss the impacts of the Proposed Project on property values.

SET # GP.9 MR. ANDERSON

GP.9-1 Key Observation Points were established based on consultations with the CPUC, U.S. Forest Service and U.S. Bureau of Land Management, Modoc County Planning Department, and comments received from public scoping meetings prior to initiation of the visual analysis. Views toward Mt. Shasta were not specified for analysis. Not knowing the location from which the commenter's photographs were taken or the focal length of the lens used, makes it inappropriate to comment on the simulations provided by the commenter. While both the Proposed Route and the alternative route may impair distant views to Mt. Shasta, it should be noted that, from Alturas, most route segments would appear as distant middleground to background features in the existing landscape. Regardless of the potential visual impact on views toward Mt. Shasta, the Class I (Significant, Unavoidable) visual impact rating would not change.

SET # GP.10 PATRICIA CANTRALL

GP.10-1 Please see response to comment GP. 2-1 for a discussion of project construction and operation impacts and alternatives considered in Nevada. Section B.3.4.5, Alternative Transmission Technologies - Underground Construction, discusses the technological, environmental, and cost restrictions associated with undergrounding major transmission lines. This section has been revised to include a discussion on the underground technologies available, the potential environmental impacts of underground transmission line operation, and a clarification of underground costs. Consistent with the restricted use of underground transmission lines, the only underground transmission line in SPPCo's system is a 0.29-mile-long (1,500- foot) section located in east Reno near the approach zone of the east/west runway of the Reno/Tahoe International Airport. Neither the California Public Utilities Commission nor the Public Service Commission of Nevada (PSCN) have requirements regarding the burial of transmission facilities. In addition, to pass on the higher costs of undergrounding to the consumers (estimated to be about 12 times as expensive to construct and 200 times more expensive to maintain), the CPUC and PSCN would have to approve such an action. For the reasons described in Section B.3.4.5, this alternative was eliminated from further consideration.

See revised Section B.3.4.5 and response to comment GP.109-7 regarding the greater earthquake impacts on buried lines.

SET # GP.11 JOHN P. CLARK

GP.11-1 Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as a joint utility corridor for the Proposed Project. See response to comment GP.2-2 regarding property compensation.

SET # GP.12 LOUIS H. PRUSINOVSKI

GP.12-1 Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as a joint utility corridor for the Proposed Project.

GP.12-2 For a variety of reasons, including some of those discussed in this comment, Proposed Segment A is considered to be environmentally superior to Alternative Segment B, and is the BLM-preferred alternative (see revised Section D.2.1 in the Final EIR/S).

SET # GP.13 MARIE ROBERTS

GP.13-1 Comment noted.

GP.13-2 Comment noted.

SET # GP.14 LORI BURKE

GP.14-1 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation, interconnection of a future transmission line or generation project to the proposed Alturas Transmission Line Project, and future utility corridor ramifications.

GP.14-2 CEQA and NEPA require that the environmental impact of a proposed project and reasonable range of alternatives be assessed. The present or historic ownership of the site is not a factor that is taken into consideration, as evidenced by the fact that CEQA case law allows the assessment of alternative sites not owned by the Applicant. Section E.3.3 has been revised to include a discussion of TANC's plans to interconnect to the Proposed Project.

GP.14-3 The comment on growth in the North Valleys is noted. Section E.3.3 of the Final EIR/S has been revised to address the rate of growth in the North Valleys area, with respect to expansion of the Border Town facilities to accommodate such growth.

GP.14-4 The comment on growth in Spanish Springs is noted. According to the Washoe County Department of Comprehensive Planning, the population in Spanish Springs is expected to grow by 343 percent, from about 6,900 in 1994 to about 23,680 in 2015. The City of Sparks plans to annex and is developing a Master Plan for this projected growth area.

GP.14-5 Section A.6.5 of the EIR/S includes a discussion of the projected failure of an existing 120 kV line running from the Tracy Substation to Spanish Springs Substation, based on growth projections in the Reno/Lake Tahoe area. The alternative presented in this section that would provide needed reliability enhancement is a 120 kV or 345 kV line from East Tracy Substation to Silver Lake Substation. As discussed in Section B.3.4.6.2 of the Final EIR/S, these alternatives would need to traverse the residential areas of northern Sparks and Reno to access the North Valley Road Substation, and as such, were eliminated from further consideration because they did not reduce or eliminate the environmental impacts for the Proposed Project. Also, the East Tracy Substation to Silver Lake Substation alternative would not satisfy other objectives of the Proposed Project. Section B.3.4.6.2 of the Final EIR/S (Section C.14.4 in the Draft EIR/S) has been revised to further explain the potential land use impacts associated with these alternatives.

GP.14-6 The comment on growth in Lake Tahoe is noted. According to the Washoe County Department of Comprehensive Planning, the population in the Washoe County portion of Lake Tahoe is expected to grow by 29 percent, from about 8,000 in 1994 to about 10,300 in 2015. Growth in this area is constrained by the scarcity of buildable parcels and Tahoe Regional Planning Agency restrictions on allowed uses of private property. The Lake Tahoe region is but a small portion of the Reno/Sparks/Tahoe service area driving the need for the Proposed Project (see Figure A.6-3 of the Final EIR/S).

GP.14-7 Additional transmission to the Lake Tahoe area does not need to be constructed in order to improve service reliability for the area. As discussed in Section A.6.5, the "weak" link in SPPCo's system is the 120 kV line running from the Tracy Substation to Spanish Springs Substation.

GP.14-8 As discussed in Section A.6.5, damage to an existing 120 kV line or an interruption of service to the Reno/Lake Tahoe area is possible. Sections A.6.2.4 and A.6.5 have been revised to address the short comings of SPPCo's reliance on the Tracy Substation for two-thirds of their power supply. SPPCo's dependence on the resources on the east side of its system was evidenced on February 16, 1990, when a storm caused the two parallel East Tracy - Valmy 345 kV lines to trip open, resulting in a blackout of the western part of SPPCo's system.

GP.14-9 Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as a joint utility corridor for the Proposed Project. Tables A-8 and B-13 both acknowledge that the Nevada Alternative would improve service and reliability to the Reno/Lake Tahoe area..

Section C.8.2.3.2 has been expanded to include a policy consistency analysis of the Proposed Project with the Garamendi Act (California Senate Bill 2431).

GP.14-10 Table A-8 presents projected construction costs for the Proposed Project and LADWP corridor alternatives as $120 million versus $220 million (Summer Lake-Valley Road Alternative), respectively. Both the Proposed Project and Nevada Alternative would provide direct access to the Pacific Northwest power market. Wheeling costs incurred by BPA to provide power to its embedded utilities within SPPCo's system would likely be higher for the Nevada Alternative than the Proposed Project given that the alternative is 65 miles longer and construction costs are higher (SPPCo would own the line regardless). The additional costs associated with the LADWP corridor alternatives can be contributed to the increased length and the need to traverse an urbanized environment. A detailed cost analysis is beyond the scope of this EIR/S and is a factor that should have been addressed in the CPUC's CPCN process (see Section A.3).

GP.14-11 Information regarding the Nevada Alternative was based on input from various federal, state, and local agencies including: Bureau of Land Management (BLM) (Eagle Lake Resource Area, Alturas Resource Area, Surprise Valley Resource Area, Carson City District, Winnemucca District), U.S. Forest Service, U.S. Fish and Wildlife Service, California Department of Fish and Game, Nevada Division of Wildlife, Nevada Air National Guard, Pyramid Lake Paiute Tribe, City of Sparks, Truckee Meadows Regional Planning Agency, Lassen County, and Modoc County.

The August (1994) meetings were conducted to informally gather environmental data that could aid in the consideration of a Nevada Alternative, with respect to potential environmental advantages and disadvantages, for possible detailed analysis in the EIR/S. The meetings provided some information that was used, with other information developed through approximately late October, to support the level of analysis that was subsequently used for and documented in the EIR/S, primarily in Section B.3.4.6.2 of the Final EIR/S (Section C.14.2.1 in the Draft EIR/S).

The Nevada Alternative was not eliminated solely on the potential impacts resulting from the two east-west legs (Alturas to LADWP ROW, and LADWP ROW to Reno). While the impacts of the east-west legs are substantial, as discussed in Section B.3.4.6.2, the north-south leg of the Nevada Alternative would impose potential biological impacts. The BLM (Winnemucca District), U.S. Fish and Wildlife Service, and Pyramid Lake Paiute Tribe all expressed concerns regarding the biological resources along this portion of the alternative. In addition, the BLM (Winnemucca District) and Pyramid Lake Paiute Tribe noted that the Winnemucca Lake and San Emidio Desert areas, two areas the north-south leg would traverse, are highly sensitive for cultural resources. These impacts contributed to the conclusion that the Nevada Alternative did not provide environmental advantage over the Proposed Project.

Additional consideration of the Nevada Alternative has been given and the results are presented in a revised Section B.3.4.6.2 in the Final EIR/S.

GP.14-12 See response to comment GP.14-1. Section A.6.9.3 has been modified to address the effects of both the Proposed Project and the WWP merger on SPPCo's system.

GP.14-13 The Proposed Project is a 345 kV line. Undergrounding a 120 kV transmission line would be less expensive than undergrounding a 345 kV line since the cooling requirements would be less extensive. See response to comment GP.10-1.

GP.14-14 The need for the Proposed Project to terminate at North Valley Road Substation is addressed in Section A.6.5. As discussed in Section A.6.5, SPPCo projects the failure of an existing 120 kV line by the summer of 1997 resulting in either line damage or an interruption of service if projected growths are realized. As noted in Section A.6.5, the actual failure of the subject 120 kV line (necessitating the timing of the Proposed Project) is contingent upon the timing of actual growth. There are no known substations in California that have a "spare phase shifter" in place that could accommodate the power transfer rating of the Proposed Project (300 MW).

With respect to the referenced Forest Service alternative, this alignment was eliminated from further consideration, as discussed in Draft EIR/S Section B.3.4.1. This alignment has, however, been given additional consideration and the results are presented in a revised Section B.3.4.1

As presented in Section C.8, Table C.8-1, with the exception of a single residence along Segment L and the apartment complex along Segment X, the Proposed Project is a minimum of 300 feet from residences. The EIR/S also addressed many alternatives that would not involve the use of the Border Town Substation site, including: Transmission Alternatives discussed in Section B.3.4.6.2, East Petersen II Alternative, the alternative Border Town sites discussed in Section B.3.4.2, and the Tuscarora Alignment Alternative.

GP.14-15 As discussed in Sections A.6.8.2 and B.3.4.4, the Piñon Pine Power Plant would offer little system benefit with respect to the Proposed Project objectives, since the power plant would be located at the Tracy Substation, on the east side of SPPCo's system. Further, given the commencement of construction of the Piñon Pine Power Plant, it will be in place, regardless if the Proposed Project is approved or not. Sections A.6.2.4, and A.6.5 has been revised in the Final EIR/S to elaborate on the

need to terminate the Proposed Project at the North Valley Road Substation because of the existing restrictions on the east side of the system

GP.14-16 As is documented in Final EIR/S Section B.3.4.6.2 (Section C.14.2.1 of the Draft EIR/S), it is believed that impacts in the referenced Alturas-to-LADWP corridor segment would, in fact, be substantially greater than those of the northern portion of the proposed route (particularly with respect to land uses, visual resources, and biological and earth resources/hazards in the eastern Alturas, Warner Mountains, and Surprise Valley areas). It should be noted that the referenced National Forest utility corridor is not appropriate for a large transmission line like the Proposed Project (Diane Henderson, Forest Supervisor, Modoc National Forest). Further, the LADWP corridor portion of the Nevada Route Alternative is not well characterized with respect to environmental resources (e.g., the powerline was approved and built before NEPA became law, and no comprehensive environmental impact assessment study was conducted - see response to comment GP.1-3). Be that as it may, it is not appropriate to infer that the environmental resources of concern and potential impacts of constructing a 345 kV line parallel to the LADWP line are not significant (see response to comment GP.14-11). However, additional consideration of the Nevada Route Alternative, as well as of the Forest Service-proposed alternative east of Petersen Mountain, has been given and the results are presented in revised Sections C.14.2.1 and B.3.4.1, respectively, in the Final EIR/S.

GP.14-17 The feasibility of terminating the Proposed Project on the east of SPPCo's Reno/Sparks service area has been addressed in Section A.6.5 and has been added as an alternative to Section B.3.4.2 of the Final EIR/S. The environmental consequences of distributing the electric power from a project alternative terminated at the Tracy Substation to the north-western Reno area via multiple 120 kV lines is discussed in Section B.3.4.6.2.

Section B.3.4.6.2 also discusses the impacts associated with constructing a 120 kV line from SPPCo's East Tracy Substation to Silver Lake Substation. Regardless of the voltage of the transmission line, construction impacts within an urban environment would be similar (land use, air quality, transportation, noise). While a 120 kV line could necessitate a narrower separation distance if SPPCo's existing transmission line corridor is utilized (containing 345 kV and 120 kV lines), given the existing buildout of the area, land use/property owner constraints are still expected. However, this factor doesn't take into account the need to construct several 120 kV of 230 kV lines in lieu of one 345 kV line (see Section B.3.4.6.2).

GP.14-18 As discussed in Section A.6.3.3 of the Final EIR/S, the Proposed Project phase shifter has been sized appropriately to allow approximately 300 MW of power to flow over the line.

GP.14-19 SPPCo purchased the Border Town Substation site in 1990 in anticipation of needing a substation in the Border Town area of their system as identified in SPPCo's 1989 Electric Resource Plan (ERP). Projects identified in the 1989 ERP necessitating a substation in the Border Town area included the Alturas Project and SMUD. SPPCo purchased the site through a third party to minimize the acquisition price of the site. See response to comment GP.14-2.

GP.14-20 See responses to comments . GP.1-3 and GP.14-11. Section E.3.3 has been revised to include a discussion of the growth-inducement potential of the Proposed Project as it relates to the Garamendi Act.

GP.14-21 Referring to the cost estimate of $220,000,000 in Table A-8 for the LADWP corridor alternative, approximately 0.8% or $1,760,000 relates to the "cost of crossing Sparks". If the urbanized areas west of Sparks, proceeding to the North Valley Road substation are included, the cost is approximately 1.5%, or $3,300,000.

GP.14-22 The Los Angeles Department of Water and Power raised as a concern the simultaneous loss of two major transmission lines due to a single event, such as a plane dragging a broken conductor from one facility to another. This concern is consistent with the Western System Coordinating Council reliability and operating criteria. No analysis was done to estimate the probability of such single events (plane, earthquake, storm, vandalism) happening.

GP.14-23 See responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as a joint utility corridor for the Proposed Project. The land around the north-south leg of the LAWPD corridor (i.e., Nevada Alternative) is BLM land. The land around the northern portion of the east-west leg of the corridor is a combination of private and BLM land. The land around the southern portion of the east-west leg of the corridor is private land. Recreational impacts on federal lands are discussed in Section C.8.2 (Land Use). It will be the decision of the BLM and USFS to determine whether the Proposed Project is consistent with the intent of these federal lands.

GP.14-24 Permitting was not considered a significant issue in eliminating North Valley Road as an alternative to the Border Town Substation (see Section B.3.4.2 of the Final EIR/S). If expanding the North Valley Road Substation were being considered as an alternative to constructing the Border Town Substation, the City of Reno would decide whether to grant Sierra Pacific Power Company a permit to expand the substation. This EIR/S cannot speculate on whether or not such expansion would be permitted. The alternative of expanding the North Valley Road site was considered, but it was concluded that the alternative does not provide environmental advantage in comparison to the Border Town Substation (see expanded discussion in Section B.3.4.2 of the Final EIR/S).

GP.14-25 Comment noted.

GP.14-26 The adequacy and legality of planning by a Project Applicant are not appropriate issues to address in a CEQA or NEPA document. The land use impacts of constructing and operating the Border Town Substation are included under "Impacts on Residential Uses" In Sections C.8.2.2.1 and C.8.2.2.2 of the Final EIR/S. Also, see responses to comments OC.28-5 and GP.14-2.

GP.14-27 Reactors are devices that control reactive power. See Section B.3.4.2, Expansion of North Valley Substation, for a discussion of the use of reactors for the Proposed Project.

GP.14-28 As discussed in Section B.3.4.2, Expansion of North Valley Substation, the closer the phase shifter is to service crews, the better.

GP.14-29 Under CEQA, the environmental impacts of the Proposed Project and a reasonable range of alternatives are required to be addressed. Section B.3.2 of the Alturas Transmission Line Project EIR/S presents the CEQA screening methodology that was applied when addressing the reasonable range of alternatives to the Alturas Project. As specified in Section B.3.2, alternatives were evaluated with respect to their ability to satisfy the project objectives, one of which is improving the service reliability to the Reno/Lake Tahoe area. As discussed in Section A.6.5, terminating the Alturas Project at the North Valley Road Substation would be required if anticipated growth of the Reno/Lake Tahoe area is realized and to remedy existing restrictions on the east side of the system. This conclusion presented in the EIR/S was drawn based on an independent review of SPPCo's existing system and future operation scenarios. The finding for "need" at the hearing noted by the commenter was not a factor considered in the independent review of SPPCo's information. Sections A.6.2.4 and A.6.5 have been expanded to address how termination of the project at the North Valley Road Substation remedies the noted system restrictions.

GP.14-30 The Draft EIR/S contains an independent, objective analysis of the impacts of the Proposed Project and a reasonable range of alternatives, in accordance with CEQA. Alternatives were not eliminated based on SPPCo's earlier dismissal. Section A.6.5 discusses that if growth in the Reno/Lake Tahoe area is not realized as projected, the project will not need to be in place by the summer of 1997. Response to comment GP.21-3 addresses that under CEQA case law, a feasible alternative is one that can be accomplished in a reasonable period of time.

GP.14-31 As discussed in Section C.10.2.3.1 under "Available EMF Mitigation," the Applicant has incorporated some of the currently available techniques for reducing EMF strengths into the project, which are consistent with the CPUC No-Cost/Low-Cost EMF Mitigation Policy, without regard to location within California or Nevada; no further mitigation measures are recommended therein.

GP.14-32 The suitability of the planning, policy development, and decision making processes of the U.S. Forest Service, and the issue of precedent setting for land use decisions by this agency are not appropriate issues to be addressed in the EIR/S. Please forward these comments directly to the U.S. Forest Service.

For further clarification, discussion of Segment X under "Washoe County" in Section C.8.1.2 of the Final EIR/S has been enhanced to include Peavine Peak and Rancho San Rafael Park recreational uses. These areas have also been included in Section C.8.2.2.2 in the Final EIR/S under "Operational Impacts on Recreational Uses."

See response to comments GP.1-3 and GP.14-1 regarding the use of the Proposed Project right-of-way as a future utility corridor.

GP.14-33 See revised Section E.3.3 of the Final EIR/S. Section A.6.4 also addresses SPPCo's responsibility to provide transmission capacity to requesting wheeling customers with respect to the 1992 Energy Policy Act.

GP.14-34 Getting 345kV lines into and out of Stead would cause greater impacts than the Proposed Project's Border Town Substation site (see Section B.3.4.2). Stead is currently serviced by a 60 kV transmission line. The extension of a future 120 kV line into Stead would impose significant impacts (see Section E.3.3 of the Final EIR/S).

GP.14-35 Contracts with geothermal producers have not been cancelled because of the Proposed Project. SPPCo has historically included geothermal power as part of their supply, which has varied based on need and availability. For example, SPPCo's most recent requests for proposals (RFP) for geothermal resources occurred in 1989 and 1993. The 1989 RFP resulted in six geothermal power purchase agreements, in which two are on line. The 1993 RFP resulted in the selection of gas fired facilities because they were more economical. SPPCo plans to issue future requests for proposals, as the need for additional supply warrants, and as the demonstration of cost-effective and reliable geothermal availability is made.

GP.14-36 The development of geothermal resources in northern California would result in electric power "generation," not transmission. As discussed in Section B.3.4.3, generation alternatives cannot provide additional access to the Pacific Northwest power market or improve import capability (objectives of the Proposed Project), except for providing improved response to long-term emergencies. For these reasons, generation alternatives were eliminated from further consideration.

GP.14-37 The referenced text (page E2-25 of Appendix E.2 in Volume III of the Final EIR/S) is a generalized statement made incidentally in a report on bird electrocution/collision potential. See response to comment GP.10-1 for a cost comparison of constructing and operating an under ground transmission system.

GP.14-38 Section A.6.9.1 states that 85 percent of the power BPA sells is hydroelectric. This section also notes that BPA transmits nuclear power. The EIR/S does not state that access to Pacific Northwest hydroelectric power is "environmentally superior." Finally, Section A.6.9.1 discusses the availability of hydroelectric power in light of the ongoing System Operation Review (SOR) of the Columbia River hydroelectric system and states that the availability of hydroelectric power for nonfirm purchases could be limited in the future. Section A.6.9.1 of the Final EIR/S has been expanded to elaborate on how the SOR would affect SPPCo's access to the Pacific Northwest power market. Section E.3.3 discusses the growth-inducement implications of the Proposed Project as it relates to the development of additional generation in the Pacific Northwest.

The need for the Alturas Project during peak demand periods is related to the project objective of improving service reliability to the Reno/Lake Tahoe area. The project objective of access to the Pacific Northwest power market provides SPPCo with an economical source of power during the spring and summer months, and is not necessitated by peak demand.

GP.14-39 Section A.6.8.2 discusses the use of generation to improve service reliability, including the Piñon Pine Power Plant. SPPCo's statements regarding the adequacy and reliability of the Tracy distribution system relate to a generation project adding 89 MW of summer-rated capacity.

GP.14-40 One of the project objectives is to improve service reliability. The ability of generation alternatives, not the reliability of generation alternatives, to improve service reliability is the applicable topic to address, as was presented in Sections A.6.8.2 and B.3.4.4 of the EIR/S.

GP.14-41 See revisions to Sections A.6.2.4 and A.6.5 in the Final EIR/S.

GP.14-42 See response to comment GP.14-34.

GP.14-43 The text referenced in the comment addresses Eastside Route 2, an alternative which has been eliminated from further consideration. This alternative does not address the entire area of Segments X and Y. However, this alignment has been given additional consideration and the results are presented in revised Section B.3.4.1 of the Final EIR/S. Also, see response to comment GP.14-32 regarding recreational use. See revisions to Section E.3.3 for a discussion of growth inducement impacts.

GP.14-44 The comment on the industrial land use immediately north of the North Valley Road Substation site is noted. The text referenced in the comment should not refer to the area *immediately* north of the substation site and has been revised accordingly in the Final EIR/S.

The comment indicates that the Proposed Project is not compatible with residential development in the area of Proposed Segment X, Alternative Segment X-East, and Segment Y. The EIR/S acknowledges the existence of sensitive residential uses within the study corridor (330 feet on either side of the centerline) and near the study corridor (within 2000 feet of the centerline) of the proposed transmission line route. Table C.8-1 shows the North Foothill Apartments and several residences as sensitive residential uses in the area of these segments. Section C.8.2.2.2 addresses the degradation of residential uses as a significant, non-mitigable (**Class I**) impact. Section C.8.2.3.3, under "Washoe County," addresses consistency of the Proposed Project with the plans and policies of Washoe County. The CPUC and BLM will use the information in the EIR/S to decide whether to approve the Proposed Project and what project route to select.

The Eastside Route 2 alignment has been given additional consideration (including points made in this comment) and the results are presented in revised Section B.3.4.1, of the Final EIR/S.

GP.14-45 See revisions to Sections A.6.2.4 and A.6.5 in the Final EIR/S.

GP.14-46 As discussed in Section A.6.6, since the Alturas project would allow direct connection to the Northwest Power Pool, combined with an increase in import capability, SPPCo would have increased access to more markets, thus enhancing their opportunity for savings.

GP.14-47 See revisions to Sections A.6.2.4 and A.6.5. in the Final EIR/S.

GP.14-48 The merger of SPPCo and Washington Water Power will not affect SPPCo's import capacity rating. SPPCo's current import capability is limited by existing intertie capabilities which will not change until a new intertie is in service.

GP.14-49 We appreciate your concern about the possible electrical induction effects due to the proximity of the power lines and the gas pipeline. This possible hazard was addressed in Section C.10.2.3.3 of the EIR/S and Mitigation Measure P-1 was proposed.

GP.14-50 This comment is part of a larger concern about the proximity of the Alturas Transmission Line to two existing powerlines and a gas pipeline in Washoe County. This response addresses concerns about engineering constraints related to the steepness of the route, soils type, and displacements.

The topography and the nature and distribution of the rocks and soils along this route are discussed in Section C.6 of the EIR/S, and shown on Base Maps 30 through 33 at the back of Volume I and on tables in Appendix F (see Volume III). The rocks and soils along this route are predominantly hard, ancient, volcanic and granitic rocks overlain in a few places by old lake sediments and younger alluvial-fan deposits. These rocks and sediments weather to predominantly gravelly loam soils (i.e., gravel, sand, clay mixtures). Although clays may occur locally, they are relatively rare along this route. Be that as it may, clays, as well as all of the other types of rocks and soils, can provide suitable foundations for the proposed powerline structures provided that the proper geological and engineering investigations are conducted.

Geotechnical studies are required by Mitigation Measures G-2 through G-7, G-11, G-13, and G-14. These studies will be conducted before construction of the project and should identify any adverse or unstable deposits or slope conditions that might lead to downslope landslide displacements, or to fault displacements. Analyses conducted as part of the EIR/S process indicate that adverse conditions are widely spaced enough that they can generally be avoided. Adverse conditions that cannot be avoided will be accounted for by designing the structures to resist displacement and collapse.

GP.14-51 The comment on the motivation of the Project Applicant in implementing low-cost EMF reduction measures is noted. Section C.8 has been revised to specifically address the compatibility of the Proposed Project with Rancho San Rafael Park.

GP.14-52 The comments on the cost of constructing the Border Town Substation compared to expanding the North Valley Road Substation, and on the land use compatibility of expanding the North Valley Road Substation are noted. The existing North Valley Road Substation is very prominent as viewed from several locations (including North McCarran Boulevard and Socrates Drive). Expansion of the substation would worsen this visual environment, but due to the disturbed nature of the existing landscape the anticipated visual impact would be adverse, but not significant. See response to comment GP.14-24. However, additional consideration of the North Valley Substation expansion has been given and the results are presented in revised Section B.3.4.2 of the Final EIR/S.

GP.14-53 Comment noted. As required by CEQA, the environmental impacts of the Proposed Project and a reasonable range of alternatives are to be assessed. Since SPPCo has proposed the termination of the Alturas Transmission Line at the North Valley Road Substation, this aspect of the project was addressed in the EIR/S. See response to comment GP.14-17 for a discussion of terminating the Proposed Project at the Tracy Substation.

GP.14-54 The alternatives that utilize the LADWP right-of-way would require the construction of 30 miles of transmission line from Fernely to the North Valley Road Substation. As discussed in Section B.3.4.6.2 of the Final EIR/S, since the alternatives would need to traverse northern Sparks and Reno to access the North Valley Road Substation, thess alternatives were eliminated from further consideration since it does not reduce or eliminate the significant impacts of the Proposed Project. Section B.3.4.6.2 has been expanded to include a discussion of distributing power from the LADWP corridor via a system of 120 kV lines.

GP.14-55 See revisions to Sections A.6.5 in the Final EIR/S.

GP.14-56 See revisions to Section A.6.2.4, A.6.5 and B.3.4.6.2 in the Final EIR/S.

GP.14-57 See response to comment GP.14-17. Sections A.6.8.2 and B.3.4.4 of the EIR/S discuss to what extent the Piñon Pine Power Plant can satisfy the reliability concerns to be addressed by the Proposed Project. See response to comment GP.14-1 for a discussion of the environmental consequences of the north-south leg of the Nevada Route Alternative.

GP.14-58 See revisions to Section A.6.5 in the Final EIR/S.

GP.14-59 With the exception of one residence on Segment L and an apartment complex on Segment X, the Proposed Project would avoid all residences and sensitive land uses (schools, churches, etc.) by a minimum of 300 feet (see Table C.8-1). Such separation distances would not be possible for the alternatives that would need to traverse Sparks and northern Reno.

GP.14-60 Comment noted. Section A.6.4 discusses how an increase in import capability will improve SPPCo's transmission service and ability to purchase from neighboring systems. Section A.6.2.3 has been added to the Final EIR/S to specifically address current and requested wheeling roads. Section C.8 of the Final EIR/S has been revised to include a discussion of Garamendi Act consistency. Section A.6.9.3 has been modified to specifically address the effects of Alturas and the WWP merger on SPPCo's system. See responses to comments GP.1-3 and GP.14-11 for a compete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as a joint utility corridor for the Proposed Project.

GP.14-61 Section A.6.2.4 presents in a summary format, both the existing (4th bullet) and anticipated (1st, 2nd, and 3rd bullets) limitations of SPPCo's system. Sections A.6.4 and A.6.5 describe how the Proposed Project would alleviate the identified limitations. Section A.6.6 discusses how Proposed Project access to the Pacific Northwest power market offers economic benefits.

GP.14-62 See revisions to Sections A.6.2.4 and A.6.5 in the Final EIR/S. Section A.6.6 clearly states that access to the Pacific Northwest provides economic benefits. Section A.6.9.1 (revised) notes that even without available economic power from the Pacific Northwest, most of the benefits associated with the other project objectives would not be affected.

GP.14-63 Figure A.6-3 of the Final EIR/S has been revised to illustrate the distribution of load within SPPCo's service area. Section A.6.2.2 discusses SPPCo's Supply System, not the Reno grid. Section A.6.5 discusses how the timing of the Proposed Project is related to the realization of projected growth. Line losses, while not desirable, are not only unavoidable, but preferable to line damage or an interruption of service. See Sections B.3.4.2 and B.3.4.6.2 for discussions of terminating the Proposed Project on the east side of the system and distribution to the Reno area via 120 kV lines, respectively.

GP.14-64 The EIR/S makes no reference to SPPCo's Border Town property as an "existing" substation site. It is acknowledged that the alternative Border Town Substation site would not comply with CC&R's covering the site. See responses to comments OC.28-5 and GP.14-2. With regard to designations in the PEA, the PEA is the Applicant's document and is not part of the EIR/S. See revised Section E.3.3 in the Final EIR/S regarding growth inducement.

GP.14-65 See revised Section B.3.4.2 in the Final EIR/S regarding the North Valley Road Substation expansion alternative.

GP.14-66 See response to comment GP.14-1.

GP.14-67 Section A.6.2.3 has been added to address the requests SPPCo has received for additional transmission service and the existing system limitations to satisfy those requests. The discussion of reserves is included in the EIR/S to illustrate the indirect benefits of additional import capacity. See revisions to Section A.6.4 in the Final EIR/S. Section B.3.4.5 of the Final EIR/S discusses the sizing of the Proposed Project, in terms of voltage .

GP.14-68 SPPCo currently only has "indirect" access to BPA via Pacificorp and IPC. As discussed in Section A.6.6, direct access provides economic benefits. See response to comment GP.1-3 for a complete discussion of utilizing the LADWP 1000 kV DC line right-of-way as a joint utility corridor. As discussed in Section B.3.4.6.2 of the Final EIR/S, the Nevada Alternative was eliminated from further consideration because it did not provide environmental advantage over the Proposed Project. Section A.6.4 discusses how an increase in import capacity improves transmission service system-wide and revised Section A.6.5 of the Final EIR/S discusses why the Proposed Project needs to be terminated at the North Valley Road Substation. As discussed in Section B.3.4.6.1 of the Final EIR/S, the Nevada Power Intertie Alternatives would not reasonably satisfy the project objectives (see Table A-8 of the Final EIR/S for a direct comparison).

GP.14-69 As noted on Figure A.6-5 of the Draft EIR/S, the Loads vs Existing Supplies graphic is from SPPCo's 1993 Electric Resource Plan. This figure has been updated in the Final EIR/S and the text has been modified accordingly.

GP.14-70 See response to comment GP.14-69.

GP.14-71 See response to comment GP.14-69.

GP.14-72 The LMUD interconnection was stated in Sections A.6.3, A.6.7, B.3, and C.14 of the Draft EIR/S as a secondary objective of the project. Further, in Sections A.6.3 and A.6.7, secondary objectives were defined as not being "principal justifications of the project, and would not satisfy critical needs". In addition, in Section B.3 it was stated that per CEQA Guidelines, alternatives are to be considered if they are "capable of eliminating or reducing significant environmental effects even though they may impede to some degree the attainment of project objectives." The alternatives eliminated from further review in Sections B.3.4.3, B.3.4.4, B.3.4.5, and B.3.4.6.1 of the Final EIR/S were eliminated because they did not satisfy the projects primary objectives. The alternatives eliminated from further review in Section B.3.4.6.2 of the Final EIR/S, (Section C.14 of the Draft EIR/S) were eliminated because they did not eliminate or reduce significant environmental effects.

GP.14-73 The noted BPA customers are embedded within SPPCo's service area. By increasing the import capacity of the SPPCo system, further modifications to service these customers would not be required. An increase in import capacity and resultant service improvements to the noted customers is but one of many of the anticipated service improvements resulting from the Proposed Project (see Sections A.6.4, A.6.5, and A.6.6).

SET # GP.15 PATRICIA M. WADE

GP.15-1 Comment noted.

SET # GP.16 KENNETH G. LYNN

GP.16-1 Comment noted.

SET # GP.17 WILLIAM L. D'OLIER

GP.17-1 Comment noted.

GP.17-2 Comment noted. Section E.3.3 has been modified to address the extension of fiber optic service.

GP.17-3 Comment noted.

SET # GP.18 IRWIN A. AILARA

GP.18-1 Land owners whose property will be crossed by the right-of-way will be compensated for land or easements that will affect potential future use. Also, please see response to comment GP.2-2.

GP.18-2 The transmission line would not block access to private property as roadways could traverse the ROW beneath the power lines. Access may be blocked for a period of one or two days during construction of the power line.

GP.18-3 As discussed in response to comment GP.18-2, access to APN 045-131-31 would not be permanently denied because of the Alturas Transmission Line. As illustrated on Base Map 11 at the back of Volume I of the Final EIR/S, across APN 045-131-31, the Alturas Transmission Line would parallel U.S. 395 and the Tuscarora Gas Pipeline on their northeastern sides for a distance of approximately 2000 feet. The transmission line would also be about 400-feet back from the northeastern boundary of U.S. 395. Transmission line structures would be placed approximately every 1,200 feet. Given this separation distance, no more than two structures would be placed on the site. Given the 400 foot set back from U.S. 395 and the 1,200 foot distance between structures, the Alturas Transmission Line would have little impact on the future siting of commercial services on the site. As discussed in Section C.13.2.2.4, the proposed transmission line would impose a significant, unavoidable visual impact (Class I) to the area.

GP.18-4 It is common practice in the United States and industrialized nations to site various utilities within the same corridor, including transmission lines and gas, water, sewer, oil and product pipelines. Given modern safety systems and practices, collocation of utilities has been done safely throughout the United States and industrialized nations. Since the proposed gas line and transmission line would be constructed utilizing modern technology and safety practices, the failure rate of these facilities would be lower than older, existing facilities.

GP.18-5 See response to comment GP.18-1.

GP.18-6 See responses to comments GP.18-2 and GP.18-3.

GP.18-7 Business/commercial/residential development in the area is speculative, so it is not clear that shifting the gas pipeline and electric transmission line a mile away from the highway will result in greater development. See response to comment GP.18-3.

SET # GP.19 SUSAN M. GROSS AND PETER A. CUTANOVK

GP.19-1 Please see response to comment GP.52-3.

GP.19-2 Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications. See response to comment GP.2-2 for a discussion of property value degradation impacts.

GP.19-3 Discussion of Segment X under "Washoe County" in Section C.8.1.2 of the Final EIR/S has been enhanced to include Peavine Peak recreational uses.

GP.19-4 Because of the disturbed nature of the existing landscape and distance from the homes (minimum 2,500 feet), the power line is not expected to have a significant impact on property values in the Horizon Hills area of Reno. See response to comment GP.28-1.

GP.19-5 See second paragraph of response to comment GP.8-2.

GP.19-6 The transmission line will be designed to safely withstand the loads imposed by high winds in the area. The tension in the conductors and shield wires would be well below their breaking strength. Therefore, the probability of a forest/range fire caused by the breaking of a conductor due to high wind is extremely low (see Sections C.10.1.4.3 and C.10.2.3.3 of the EIR/S for a complete discussion of fire hazards).

SET # GP.20 D. E. STAHL

GP.20-1 The analysis includes impacts to wildlife species which may not be listed in the category of "special status species," such as the species that have been listed in this comment. Please refer to Mitigation Measure B-16, which includes specific measures to prevent impacts to or mortality of general wildlife during construction of the Proposed Project.

GP.20-2 Your concern for the ground nesting birds has been noted. There have been many studies on chick embryos and possible reproductive effects. An Oak Ridge Associated Universities Panel for The Committee on Interagency Radiation Research and Policy Coordination published a book titled "Health Effects of Low-Frequency Electric and Magnetic Fields" in June of 1992. This book evaluates the chick embryo studies performed to date in pages VI-31 through VI-32. In the opening paragraph they conclude: "There have been approximately 15 studies of chick embryos to EMF which have not yielded consistent results. In fact, the results were in such disagreement that an international study was designed in an effort to resolve the discrepancies. Six laboratories located in Europe and the United States utilized the same method of exposing chick embryos just after fertilization. Two of the laboratories reported an increase in malformations in the exposed embryos, while the other four laboratories did not." In addition, avian species are mobile and are not likely to spend all life stages within the range of EMF.

GP.20-3 The greater sandhill crane population in the vicinity of the Proposed Project is listed as Threatened under the California Endangered Species Act. The offsite compensation lands for cranes would be chosen based on its suitability to support lost cranes. These lands would be approved, maintained and owned by the appropriate regulatory agencies to provide crane use of the offsite habitat. The purpose of establishing offsite crane habitat is to compensate for the expected crane mortality despite the use of markers. Please see Appendix E.1 for a further discussion of this issue. Appendix E.1 clearly includes the Madeline Plains as a crane use area.

GP.20-4 Comment noted. As described in Section C.13 of the EIR/S, the Proposed Project would negatively affect views to the west and to the east in the vicinity of the Proposed Route and Alturas. The impact was categorized as a Class I, significant, unmitigable impact. Please see response to comment GP.6-1.

GP.20-5 See response to comment GP.14-11.

GP.20-6 Bayley Reservoir, Graven Reservoir, Nelson Corral Reservoir, and Delta Lake were surveyed during the waterfowl migration period and the early nesting season. There were no observations of heavy use of this area by waterfowl. Please see Table C.3-5, which includes a segment-by-segment analysis of potential impacts to sensitive waterfowl species. Also, please see Appendix E.8 in Volume III of the Final EIR/S for a summary of the results of waterfowl surveys of the route.

Recreational uses at Delta Lake, Bayley Reservoir, and Graven Reservoir (along with Graves Reservoir) are described in Section C.8.1.2 of the EIR/S under Segment C of "Modoc County." Viceroy Pond, Juniper Stock Tank, and Smith Reservoir have been added to this list of recreational water bodies in the area of Segment C , and to the impact analyses in Sections C.8.2.2.1 and C.8.2.2.2 of the Final EIR/S. Recreational uses at Nelson Corral Reservoir are described in Section C.8.3.2.

Sections C.8.2.2.1 and C.8.2.2.2 address the disturbances to recreational uses during construction and operation, respectively, of the Proposed Project. Impacts to recreational uses at the water bodies listed in this comment were determined to be non-significant based on the land use significance criteria in Section C.8.2.1 of the EIR/S.

GP.20-7 EIR/S Section C.3.2.2.2 under Impact 5, C.4.2.2 under Impact 3, and C.8.2.2.2 under "Operations Impacts of Increased Access" describe the significant, mitigable impacts of increased human access on biological resources; cultural resources; and residential, recreational, and agricultural uses. Mitigation Measures B-6 and C-5 call for replacing existing barriers to overland travel routes; placing new barriers to non-bladed overland travel routes; returning all access routes to pre-improvement conditions; obtaining approval from the BLM, CPUC, CDFG, USFWS, USFS regarding existing and new access routes that will remain open for project operation and maintenance; and closing existing open roads identified by these agencies to protect natural resources. These mitigation measures were developed to reduce the significant impacts of increased human access; they are not expected to eliminate increased human access to the project area.

GP.20-8 The detailed maps of the Proposed Route and alternative alignments are based on topographic maps prepared by the U.S. Geological Survey (USGS). The base maps are only as current as the last update by the USGS, and may not reflect all of the features now present. However, the EIR/S analysis considers all existing features. Please refer to the "Environmental Baseline and Regulatory Setting" sections in each issue area for current information.

SET # GP.21 JOHN P. SPRINGGATE

GP.21-1 As summarized in the Impact Summary Tables. all Class I impacts identified, including land use and visual impacts, would result from the presence of the project after it is constructed. Discussion of Segment X under "Washoe County" has been enhanced to include Rancho San Rafael Park. The discussion of the North Valley Substation expansion alternative has been augmented to clarify the potential impacts associated with this alternative (see Section B.3.4.2).

GP.21-2 Alternatives to the Border Town site have been considered in the EIR/S. The commenter is referred to the revised Sections B.3.4.1 and B.3.4.2 of the Final EIR/S, which consider an alternative site in the Stead area, expansion of the North Valley Road Substation, a route to the east of the Petersen Mountain Range (Eastside Route 2) and the Tuscarora Alignment Alternative that would both involve a different substation site, as well as different substation sites in the Border Town area. In addition, Section B.3.4.6.2 of the Final EIR/S considers alternatives within Nevada which would imply a different substation site.

GP.21-3 The EIR/S for the Alturas Transmission Line was prepared by Aspen Environmental Group under the direction of the California Public Utilities Commission and Bureau of Land Management, the CEQA and NEPA Lead Agencies, respectively. Please see Sections A.3 and A.4 for a complete discussion of the regulatory roles of these Lead Agencies.

Responses to comments GP.1-3 and GP.14-11 discuss the regulatory and environmental restrictions associated with the Nevada Alternative. As presented in Section B.3.4.6.2 of the Final EIR/S, several factors were taken into consideration when reviewing the potential transmission line alternatives including: environmental impacts, utility corridor requirements, and timing of alternative permitting and design. This latter factor was presented since current CEQA case law states that a feasible alternative "...is one which can be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (see Section B.3.2.2 of EIR/S), but was only given minor consideration because the planning of future transmission facilities is the responsibility of the Applicant. As discussed in Section A.6.5, if growth in the Reno/Lake Tahoe area is not realized as projected, the Alturas Transmission Line would not need to be in operation by the summer of 1997 (timeframe of expected failure of an existing SPPCo 120 kV line). The elimination of alternatives from further consideration in Section B.3.4.6.2 of the Final EIR/S was based on all of the factors noted above.

GP.21-4 Section C.10.2.3.1 provides a complete discussion of the electric and magnetic impacts (EMF) associated with the Alturas Transmission Line. Figures C.10-3 through C.10-10 present the EMF strengths for the project centerline to a distance of 300 feet from the centerline. As discussed in response to comment GP.8-2, at a distance of 300 feet from the centerline, the EMF strengths would be comparable to common household appliances. Except for a residence on Segment L and an apartment complex on Segment X, all residences would be at least 300 feet from the Proposed Project centerline. The Nevada Alternative would subject more residences to EMFs since the alternative would need to traverse northern Sparks and Reno to access the North Valley Road substation, where separation distances of 300 feet for most residences would be infeasible.

GP.21-5 Currently, transmission facilities exist between SPPCo and the Truckee Donner Public Utility District (TDPUD), no expansion of the facilities would be required to accommodate the additional power requested by TDPUD (see Table A-5 of Final EIR/S). Section E.3.3 has been amended in the Final EIR/S to include a discussion of the growth inducement aspects of providing additional power to the TDPUD.

SET # GP.22 GEORGE HERMAN

GP.22-1 Please see response to comment GP.6-1 for a discussion of project construction and operation impacts. As discussed in Section C.10.2.3.1, the long-term health effects of EMFs have not been conclusively determined. See response to comment GP.8-2 for a discussion of EMF strengths at residences within the vicinity of the Alturas Transmission Line. As discussed in response to comment GP.25-1, the notification requirements of CEQA and NEPA have been implemented.

SET # GP.23 THOMAS G. PARNOW

GP.23-1 The BLM's involvement in the project is required by the National Environmental Policy Act (NEPA), since an application for a right-of-way has been submitted to the BLM and the BLM must comply with NEPA in its consideration of a decision on the right-of-way application. The EIR/S analyzes environmental impacts on both private and public lands without regard to ownership. BLM owns lands that would be affected by both the Proposed Project and Nevada Alternative, and has been completely open to consideration of Nevada routes in the EIR/S process. With respect to the advisory committee concept, this option proposed by the contractor was not pursued in the interests of utilizing a more completely open program of public meetings and workshops for public participation and review in the EIR/S process.

GP.23-2 As described in Sections B.3 and B.4 of the EIR/S, a variety of alternatives to the Proposed Project have been considered. Section B.3 describes the process that was used to screen alternatives for detailed study in the EIR/S and Sections B.3 and B.4 provide the results of that process. Section B.4 provides specific descriptions of the alternatives selected for detailed study. The detailed environmental studies of the selected alternatives are documented primarily in Parts C and D of the EIR/S. Note also that some revisions to sections pertaining to alternatives have been made in the Final EIR/S. Section A.3 of the Final EIR/S has been revised to elaborate on the CPUC's CPCN process and its relationship to this EIR/S process.

GP.23-3 Section C.10.2.3.2 presents the fire hazard impacts of the Proposed Project. As discussed in Section C.10.3, the fire hazard impacts of the alternatives would be similar since the general design, construction, and operation of the transmission line would be the same regardless of the route chosen. While the north-south leg of the Nevada Alternative offers a less densely vegetated environment, as the commenter notes, the access time would be longer. However, the Nevada Alternative would be 65 miles longer than the Proposed Project and the two east-west legs (Alturas to LADWP ROW and LADWP ROW to Reno) would impose a high fire risk due to vegetation and urban buildout, respectively. When considering these combined factors, the Nevada Alternative would have a comparable, if not more severe, fire risk than the Proposed Project.

GP.23-4 Since the Nevada Alternative would need to traverse northern Sparks and Reno, the traffic impacts associated with construction or a power line failure would be more severe than for the Proposed Project.

GP.23-5 Much of the Proposed Project right-of-way is on public land, property that is already not part of the County's tax base. Property owners would be compensated if their land is required for the right-of-way (see response to comment GP.2-2). In addition, the value of the proposed improvements would be much greater than the value of any property taken; therefore, the County would be collecting additional taxes based on this increased value.

GP.23-6 The EIR/S describes the visual impact of Proposed Route Segments AØ3 to AØ6 in the vicinity of Alturas as a Class I, significant, unmitigable impact. The remaining Proposed Project Segments in Modoc County (AØ1-AØ3 and AØ6-CØ6) were categorized as adverse, but not significant (Class III) due to the relatively few number of viewers that would see these route segments, compared to a much larger number of viewers that would see Proposed Project Route Segments AØ3 to AØ6.

GP.23-7 The potential growth-inducing impacts of the Proposed Project are discussed in Section E.3.3, which has been enhanced in the Final EIR/S.

GP.23-8 Section C.8.3.1 of the Final EIR/S has been revised accordingly.

GP.23-9 The description of the general noise environment of Modoc County is taken from the Noise Element, as stated, and is not site-specific to the project right-of-way. Table C.9-1 does not list sawmills and the other general noise sources as project related.

GP.23-10 The information in the EIR/S was provided by the Chief of the Alturas Rural Fire Department. The chief indicated that their current ability to provide service is excellent and that the project would have no effect on the fire department's services.

SET # GP.24 JOHN R. TVRDEVICH

GP.24-1 We understand your concern for the safety of firefighters working in the area near the Alturas 345 kV line. High voltage transmission lines are designed to self de-energize in less than a second independent of the location of the fault. Although conditions could arise that increase the fault clearing time, these conditions are extremely unlikely due to redundant backup systems.

In response to your concern on the electrification of the ground during fault conditions, the ground does become electrified during a fault condition. A fault condition can cause a voltage difference across a persons step (sometimes called step potential) if the person is near the downed line. The situation where there is a possible safety concern is usually associated with distribution lines. This is because distribution lines are at lower voltages. In some situations distribution lines do not de-energize when they come into contact with the earth. At higher voltages, this situation rarely, if ever, occurs.

SET # GP.25 CHARLTON RAY AND SYDNEY A. EMBRY

GP.25-1 The Alturas Transmission Line Project Environmental Impact Report/Statement (EIR/S) is a joint document prepared by the California Public Utilities Commission (CPUC) as the State Lead

Agency and the United States Bureau of Land Management (BLM) as the Federal Lead Agency, and must adhere to the notification requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

CEQA Section 15082 requires the Lead Agency to send a Notice of Preparation (NOP) to Responsible Agencies stating that an EIR will be prepared. This NOP begins the scoping process for the EIR. According to Section 15085, as soon as the Draft EIR is completed, a Notice of Completion must be filed with the State of California Governor's Office of Planning and Research (California State Clearinghouse). CEQA Section 15087 also requires the Lead Agency to notify the public of the availability of a Draft EIR through one of the following channels:

- Public notice in a newspaper of general circulation in the affected area
- Posting of notice by the public agency on-and offsite in the area where the project is to be located
- Sending a notice to the list of property owners along the route
- Making copies of the Draft EIR available to public library systems serving the area involved
- Conducting public hearings on the environmental document, either in separate proceedings or in conjunction with the other proceedings of the public agency. Public hearings are encouraged, but not required, as an element of the CEQA process.

NEPA Section 1501.7 states that as soon as practicable after its decision to prepare an EIS and before the scoping process, the Lead Agency shall publish a Notice of Intent (NOI) in the Federal Register to invite participation of affected federal, state, and local agencies, any affected Indian tribe, the proponent of the action, and other interested persons to determine the scope of the document. NEPA also requires the Federal Lead Agency to publish a Notice of Availability of the Draft EIS in the Federal Register. In addition, to foster public involvement, NEPA recommends (**but does not require**) the Lead Agency to do the following in case of an action with effects, primarily, of local concern:

- Notice to state and areawide clearinghouses
- Notice to affected Indian tribes
- Publication in local newspapers of general circulation
- Following the affected states' public notice procedures for comparable actions
- Notice through other local media
- Notice to potentially interested community and business organizations
- Publication of a newsletter to reach potentially interested persons
- Direct mailing to property owners along the project route
- Posting notices on-and offsite in the area where action is to be located
- Hold or sponsor public meetings and/or hearings
- Make document available to public (i.e., repositories, direct document requests).

The CPUC and BLM in their efforts to notify the public about the Alturas Transmission Line Project Draft EIR/S and its public review process followed CEQA and NEPA guidelines. Notification consisted of the components described below.

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. The scoping process for the Alturas Transmission Line EIR/S consisted of five elements: Issuance of a Notice of Preparation (NOP) soliciting comments

from public agencies, as required by CEQA; issuance of a Notice of Intent (NOI) soliciting comments from public agencies, as required by NEPA; public scoping meetings; summarization of scoping comments in a Scoping Report; and distribution of the Report and scoping comments as appropriate to EIR/S team members for use in work planning and impact analysis.

The CPUC issued the NOP on March 17, 1994, and distributed it to the State Clearinghouse and other city, county, state and federal agencies. As legally required, there was a 30-day period for interested parties to submit comments regarding the content of the EIR/S. The BLM issued the NOI on March 30, 1994, filed a copy of it with the Federal Register, and it appeared in the Federal Register on April 24, 1994(?). The NOI was also sent to various public agencies for solicitation of comments on the contents of the EIR/S.

Scoping meetings for the general public, and other interested parties, were held on:

- May 17, 1994 at 6 p.m. in Susanville (Monticola Club)
- May 18, 1994 at 6 p.m. in Alturas (Modoc Middle School)
- May 19, 1994 at 6 p.m. in Reno/Sparks (Best Western McCarran Inn)
- May 25, 1994 at 6 p.m. in Loyalton (Social Hall).

A scoping meeting for government agencies was held on May 19, 1994, at 3:00 p.m. in Reno/Sparks. In addition, notices of the scoping meetings were posted in local newspapers in advance of their occurrence.

On January 27, 1995, an Alturas Transmission Line Project EIR/S Newsletter was mailed to the project mailing list which consisted of approximately 1400 names. This newsletter provided the following information: a project summary, expected release data of the Draft EIR/S; information on the pre-hearing conference regarding SPPCo's application for a Certificate of Public Convenience and Necessity, including its location, date, and time; how to comment on the Draft EIR/S and request copies of the Executive Summary; a description of the informational workshops and public hearings including, the expected locations, dates, and times of each meeting; and a list of the project information repository sites.

On March 3, 1995, the Alturas Transmission Line Draft EIR/S was released for public review. Ten copies of the Draft EIR/S were sent to the California State Clearinghouse along with a Notice of Completion. The Nevada State Clearinghouse also received ten copies of the Draft EIR/S. On March 9, 1995, a Notice of Availability of the Draft EIR/S was published in the Federal Register.

A combined Notice of Release of Draft EIR/S/Notice of Informational Workshops and Public Hearings for the Alturas Transmission Line Project was prepared. This notice contained: a brief project description; where the Draft EIR/S can be reviewed (information repositories); how to request copies of the Executive Summary and the Draft EIR/S; the date, time, and location for each informational workshop and public hearing; the start and end of the public comment period; and the procedure for commenting on the Draft EIR/S, including submission of written comments and providing oral comments at the public hearings. The notice was mailed to property owners within 600 feet of the transmission line (300 feet on either side of the centerline as recommended by the CPUC based on previous, similar projects). In addition the notice was published in the following newspapers:

Public Notification in Newspapers

Newspaper	Publication date for Notice on Release of Draft EIR/S, Workshops, and Hearings	Publication date for Notice of 30-day Extension of Draft EIR/S Public Review Period
Lassen County Times *	February 28, 1995 March 7, 1995	May 2, 1995
Modoc County Record*	March 2, 1995 March 9, 1995	May 4, 1995
The Mountain Messenger*	March 2, 1995 March 9, 1995	May 4, 1995
Reno Gazette Journal	February 26, 1995 March 5, 1995 March 12, 1995	April 30, 1995
The Sacramento Bee	February 26, 1995 March 5, 1995 March 12, 1995	April 30, 1995

** Weekly papers with publication on Tuesdays or Thursdays only.*

Informational workshops and public hearings on the Draft EIR/S were held to inform the public about the contents and scope of the Draft EIR/S and receive comments from interested parties. The table below summarizes the locations, dates, and times of the workshops and hearings.

All project documents, including the Draft EIR/S, have become available (upon their release to the public) at the following information repository sites:

California Public Utilities Commission, San Francisco, CA, (415) 703-2776
U.S. Bureau of Land Management, Susanville District Office, Susanville, CA, (916) 257-0456
BLM, Susanville District - Alturas Resource Area Office, Alturas, CA, (916) 233-4666
BLM, Lahontan Resource Area Office, Carson City, NV, (702) 885-6114
Modoc National Forest, Supervisor's Office, Alturas, CA, (916) 233-5811
Toiyabe National Forest, Supervisor's Office, Sparks, NV, (702) 355-5386
Modoc County Library, Alturas, CA, (916) 233-6326
Lassen County Library, Susanville, CA, (916) 251-8127
City of Loyalton, City Hall, Loyalton, CA, (916) 993-6750
Washoe County Library, Reno, NV, (702) 827-5853.

Informational Workshops & Public Hearings

Locations Events	Alturas	Susanville	Loyalton	Reno/Sparks
	City Hall 200 North Street Alturas, CA	Monticola Club 140 S. Lassen St. Susanville, CA	Loyalton H.S. 700 Fourth St. Loyalton, CA	Airport Plaza Hotel 1981 Terminal Way Reno, NV
Info. Workshops	3/13/95, 6-9 p.m.	3/14/95, 6-9 p.m.	3/15/95, 6-9 p.m.	3/16/95, 6-9 p.m.
Public Hearings	4/17/95, 6 p.m.	4/18/95, 6 p.m.	4/19/95, 6 p.m.	4/20/95, 6 p.m.

CEQA Section 15087(c) states that in order to provide sufficient time for public review, review periods for Draft EIRs should not be less than 30 days nor longer than 90 days from the date of the notice for

the release of the document. The CPUC and BLM extended the public review period for the Alturas Transmission Line Draft EIR/S from May 3, 1995 (60-day review period) to June 2, 1995 (90-day review period), the maximum required by CEQA Guidelines.

GP.25-2 See revised Section C.2.2.3.1 in the Final EIR/S for clarification of fugitive dust impacts which are significant, but mitigable, through implementation of Mitigation Measures A-1 through A-4. As presented in Table B-4, Construction Access Routes, no permanent overland access routes are proposed along Segment X. Corona discharge is a common phenomena and does not pose a significant impact (see Section C.10.2.3.2). See response to comment GP.8-2 for a discussion of electric and magnetic field impacts. Section C.10.2.3.2 discusses the fire impact of the Proposed Project. See response to comment GP.19-6 for a discussion of the effects of high winds on lines and towers.

As illustrated on the Base Maps included at the end of Volume I of the Final EIR/S, the Proposed Project would travel along the upper foothills of Peavine Peak. From the Horizon Hills area, the Alturas Transmission Line would be a minimum distance of 2500 feet to the west; from Anderson Acres, the project would be a minimum distance of 1000 feet; and for residents along U.S. 395, the line would be a minimum distance of 3000 feet. From the Horizon Hills area, the transmission line would appear, variably, as a noticeable but subordinate background feature that would generally be backdropped by Peavine Peak; in the vicinity of Andersen Acres, the transmission line would appear as a noticeable middleground feature, generally backdropped by Peavine Peak (see Figure C.13-17B). Within the viewshed of Peavine Peak, the visual impact would be adverse, but not significant (Class III). See Section C.13.2.2 of the EIR/S for a complete discussion. Response to comment GP.126-1 provides a thorough explanation of the visual analysis methodology utilized.

GP.25-3 Comment noted. Sections C.8.2.3 and C.13.2.2 discuss the consistency of the Proposed Project with federal, state, and local land use and visual policies. Discussion of Segment X under "Washoe County" in Section C.8.1.2 of the Final EIR/S has been revised to include a discussion of the impacts of the Proposed Project on Rancho San Rafael Park.

SET # GP.26 KATHERINE M. KERSHAW

GP.26-1 Comment noted.

SET # GP.27 CHARLES HOOPER

GP.27-1 Comment noted. The proposed gas-fired power plant near Calneva Lake was considered as a cumulative project to the Alturas Transmission Line Project. See Table B-14 (Cumulative Projects by County), Site No. 7, in Part B of the EIR/S. SPPCo has identified the general Wendel area as the location of a future substation for interconnection to LMUD.

SET # GP.28 W. SCOTT AND DENISE A. SMILEY

GP.28-1 Comment noted. Sections C.8.2.2 and C.13.2.2 of the EIR/S discuss the impacts of the Proposed Project on land use and visual resources, respectively. Response to comment GP.6-1 summarizes the construction and operation impacts of the Proposed Project. Section C.8.1.2, Segment X - Washoe County, of the Final EIR/S has been expanded to include a discussion of Peavine Peak. Response to comment GP.2-2 addresses property value impacts. A discussion of the electric and magnetic field impacts of the Proposed Project is included in response to comment GP.8-2. Response to comment GP.25-2 discusses the visual impacts of the Proposed Project in the vicinity of Peavine Peak. See response to comment GP.19-6 for a discussion of the effects of high winds on transmission line structures and lines. Please refer to responses to comments TR.24-1 and GP.67-1, and GP.76-4 for detailed discussion of power line noise. Finally, response to comment GP.75-1 discusses the impact of the Proposed Project on golden eagles.

In accordance with the California Environmental Quality Act and the National Environmental Policy Act, the EIR/S for the proposed Alturas Transmission Line is being prepared to disclose to the public and decision makers the environmental impacts of constructing and operating the Proposed Project. The California Public Utilities Commission (CPUC) and Bureau of Land Management (BLM) will consider the impacts identified in the EIR/S when making their decision on project approval or denial. The CPUC and BLM are expected to be making their decisions on the Proposed Project during December 1995. See Sections A.3 and A.4 for a complete description of how the CPUC and BLM utilize the EIR/S in their decision making processes.

SET # GP.29 MICHAEL W. HUTNICK

GP.29-1 Potential jurisdictional wetlands in the project study area were delineated using the routine wetland delineation methods described in the US Army Corps of Engineers (USACE 1987) Wetland Delineation Manual. See revised Section C.3.1.2.1 of the Final EIR/S for a discussion of wetlands found along the Proposed Project Study area. It is not possible to assess the potential impacts of the project on the proposed wetland enhancements described in the comment without more detailed information on the design of the wetlands or their locations in relation to the Proposed Project.

GP.29-2 The route refinement process is discussed in Section B.2.2.1. Alternative routes were considered in the early stages of the project, prior to scoping for this EIR/S.

SET # GP.30 TAMIA MARG

GP.30-1 Response to comment GP.6-1 summarizes the project construction and operation impacts and describes the decision making process.

As presented in Section 2.2 of the Executive Summary and Section B.3 of the EIR/S, a total of 50 alternatives were considered in the alternative screening process. Section B.3.4 of the EIR/S discusses the following categories of alternatives considered: alternative route alignments, substation alternatives,

transmission alternatives, generation alternatives, system enhancement alternatives, and alternative transmission technologies. Within each category, several alternatives were considered. Section B.3.2 of the EIR/S describes the required CEQA alternative screening methodology that was applied to the alternatives identified. In summary, this screening criteria evaluates each alternative's:

1. Ability to reduce or eliminate the environmental impacts of the project
2. Technical and regulatory feasibility
3. Consistency with the project applicant's objectives and public policy objectives.

In accordance with CEQA screening criteria, alternatives were screened out from further consideration if they could not satisfy, either individually or collectively, these criteria. For example, alternative technologies were eliminated because they did not reasonably satisfy any of the project objectives.

Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV line right-of-way in Nevada as a joint utility corridor for the Proposed Project. Section B.3.4.6.2 of the Final EIR/S has been expanded to further consider LADWP corridor alternatives and Section B.3.4.1 of the Final EIR/S has been revised to provide a more detailed analysis of the USFS alternative (East Petersen alternatives).

Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

SET # GP.31 ED ANDERSON

GP.31-1 Comment noted. Please see response to comments GP.28-1. As discussed in Section B.3.4.5 of the Final EIR/S, several alterative transmission technologies were evaluated. However, these alternatives were eliminated from further consideration because of technological infeasibility or potential environmental impacts.

SET # GP.32 LESLEY CHACE

GP.32-1 As shown in Sections B.3 and B.4, a wide variety of routing alternatives have been considered in the EIR/S process for a wide variety of environmental concerns (biological resources, visual, land use, etc.), including alternatives to mitigate impacts suggested by the public. Please see response to comment GP.30-1.

SET # GP.33 GARY A. AND LOIS I. SMYRES

GP.33-1 Discussion of Segment X under "Washoe County" in Section C.8.1.2 of the Final EIR/S has been enhanced to include Rancho San Rafael Park.

GP.33-2 Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV DC line right-of-way in Nevada as

a joint utility corridor for the Proposed Project. Response to comment GP.10-1 discusses undergrounding of transmission lines. In order to drop the voltage of the 345 kV line, several parallel 120 kV or 230 kV lines would be required. A system of parallel lines would not reduce or eliminate the environmental impacts of the Proposed Project as discussed in Section B.3.4.6.2 of the Final EIR/S. See response to comment GP.52-3 for a discussion of SPPCo's mining loads.

SET # GP.34 JEFF CARLTON

GP.34-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.35 SHARON EARLE

GP.35-1 Comment noted. Please see responses to comments GP.8-2, GP.28-1, and GP.30-1.

SET # GP.36 DALE PROVOST

GP.36-1 Comment noted. Please see responses to comments GP.1-3, GP.1-3B, and GP.6-1.

SET # GP.37 ROBERT L. HESS

GP.37-1 Comment noted. Please see response to comment GP.2-2.

SET # GP.38 ELLEN AND ROGER ERICKSON

GP.38-1 Comment noted. Please see response to comment . GP.6-1.

SET # GP.39 ROBERT C. RYAN

GP.39-1 Because of the disturbed nature of the existing landscape and distance from the homes, the power line is not expected to have a significant impact on property values in the area cited (see Figures C.13-18A, C.13-18B, C.13-19A, and C.13-19B of EIR/S).

SET # GP.40 WILLIAM C. THORNTON

GP.40-1 Discussion of Segment X under "Washoe County" in Section C.8.1.2 of the Final EIR/S has been enhanced to include Rancho San Rafael Park.

SET # GP.41 THOMAS F. KRAUEL

GP.41-1 Please see responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power 1000 kV line right-of-way in Nevada as a joint utility corridor for the Proposed Project. Other alternatives are also presented in the EIR/S that would originate in eastern Nevada or Oregon and parallel existing transmission lines. Since these alternatives

(or some combination thereof - see Table B-13 would need to traverse northern Sparks and Reno for ultimate connection to SPPCo's North Valley Road Substation, it was concluded that these alternatives did not offer environmental advantage to that of the Proposed Project because of potential significant property owner constraints and potential land use, visual, air quality, and EMF impacts (see response to comment GP.21-4). Section E.3.3 of the Final EIR/S has been modified to include a discussion of the growth-inducement potential of the Proposed Project with respect to joint utility corridor use.

GP.41-2 It is acknowledged that Daggert Canyon is used by migrating waterfowl. The Proposed Segment A crosses Daggert Canyon in an east-west direction near the top of the canyon. Potential impacts to waterfowl related to collision with transmission lines are addressed in Section C.3.2.2.3 of the EIR/S, under Impact II, and in Appendix E.1. Table C.3-14 of the EIR/S includes a segment-by-segment analysis of this impact. Migration during foggy weather or under conditions which impair visibility (including night flight) are identified as high risk collision conditions for waterfowl in Appendix E.1.

Mitigation Measure B-21 has been added to provide for a more northerly route across the head of Rock Creek. In addition, Mitigation Measure B-20 includes marking lines with bird flight diverters in the areas identified as avian use areas. The Daggert Canyon location referred to in this comment is within Segment A and would be marked with bird flight diverters. In addition, the area will be monitored for 5 years after construction of the Proposed Project to assess the effectiveness of the diverters and the impact of the transmission line on avian fauna. A contingency plan will be developed prior to project construction in the event mitigation measures are not entirely successful.

GP.41-3 Impacts on biological resources are comprehensively addressed in the EIR/S. How such impacts may result in sociological and psychological impacts such as are referenced in this comment is highly individual and subjective in nature, and not easily described and characterized with respect to the characteristics of identified groups or population subunits.

While the sociological and psychological impacts of the Proposed Project are beyond the scope of the visual analysis, the EIR/S does provide a comprehensive analysis of the potential visual impact to Alturas and vicinity. The EIR/S further acknowledges that all segments of the Proposed Project would result in an adverse visual impact (Section C.13.2.2.1) and that a cumulative visual impact could occur "if a viewer's perception is that the general visual quality of an area is diminished by the proliferation of visible structures."

GP.41-4 The cutting or thinning of junipers on the north side of Hwy 299 may increase visual access to the Proposed Project depending on actual structure placement. However, the visual impact would remain a Class I, significant, unmitigable impact. Comments regarding deer mortality are noted.

GP.41-5 Bird flight diverters increase visibility and awareness of transmission lines which will mitigate for potential avian collisions. This issue is discussed in Appendix E.1 and in Section C.3.2.2.3 of the EIR/S.

GP.41-6 Please see response to comments GP.41-4 and GP.41-5.

GP.41-7 An entire area of alternative routing possibilities has been reconsidered in further addressing the USFS (Modoc NF) Alturas Alignment. This area encompasses possible tap-in to the BPA 230 kV line north of the Alturas city golf course and south of Rattlesnake Creek, including the area of the subject alternative addressed in this comment. A specific route in this area was also selected for analysis as a possible route alternative (Segment B'). This additional consideration is presented in a revised Section B.3.4.1 in this Final EIR/S.

It should be noted that, by our calculation, the mapped alternative route attached to this comment, with the remainder of Segment B, is approximately 5.0 miles in length, which would be 2.1 miles shorter than Proposed Segment A.

With respect to air quality, as stated in Section C.2, the length of Alternative Segment B is approximately 30% shorter than the Proposed Segment A route. Segment A is approximately 7.1 miles in length, while Alternative Segment B is 4.6 miles. This results in a 30% difference in length and in construction emissions.

With respect to biological resources, Alternative Segment B analyzed in the Draft EIR/S had few plant and few wildlife impacts in the vicinity in question. The proposed USFS change would place the transmission line closer to open water habitat in Rattlesnake Creek, thereby increasing impacts to waterfowl. Impacts to big game habitat would be about the same as Alternative Segment B, however, impacts to raptors would be somewhat reduced in comparison with Segment A because remote habitats are avoided. This alternative would also be closer to documented plant communities, such as Alturas volcanic gravels plant community which is associated with several special status plant species. If the transmission line is moved closer to Rattlesnake Creek, as the commenter's suggested alternative would, the magnitude of the impact upon waterfowl and riparian habitat would be increasingly greater.

Segment A was subjected to an intensive (Class III) pedestrian cultural resources survey. The survey crews did not identify an abandoned mine shaft within the designated survey corridor. The USFS Alturas Alignment was eliminated from further consideration in the DEIR/S (see page B-52) and was not part of the detailed analysis in the Draft EIR/S (however, it has been considered further for this Final EIR/S as described previously). Under the provisions of Section 106 of the National Historic Preservation Act and implementing regulations found at 36 CFR 800, adverse effects to significant archaeological sites whose significance is based on their potential to yield information important in prehistory or prehistory are mitigable through scientific data recovery. Thus, through the mitigation measures established by Federal regulation any affects to archaeological sites in Segment A can mitigated to a level of less than significant.

With respect to geologic resources, the preliminary proposed USFS route also crosses a potentially active fault and thus there is no environmental advantage in this regard. The geologic formations along the USFS alternative would be the same geological units (Devils Garden Basalt and Alturas Formation as the along the Proposed Project route (Segment A) except that the Segment A would traverse 1 or 2 more

miles of more basaltic volcanic rock. As stated in the comment, this could result in more blasting along Segment A than the alternatives. However, is should be understood that much of the area underlying the basalt is fractured and weathered such that it is not a foregone conclusion that blasting will be required along Segment A.

The amount and degree of disturbance due to construction would be similar along the Proposed Route (Segment A), the Alternative Segment B, and the USFS Alturas Alignment. Disturbance of the basaltic rocks and soils on the Devils Garden Plateau might be less than along the softer formations along the alternative routes because overland travel is easier on the firm flat ground of the plateau, and a helicopter could be used for traversing the steep rocky slopes, thereby eliminating the need for road building along some parts of Segment A. Although it must be conceded that a shorter route generally has less potential for ground disturbance, it is not certain that this potential could actually be realized, considering the short distances involved. It is not clear that any significant environmental advantage regarding geology or soils could be gained by the USFS Alturas Alignment or Alternative B.

The hydrological conditions and environmental impacts are very similar along the Proposed Project route (Segment A), Alternative B, and the USFS Alturas Alignment. The depth to groundwater is the same and all routes would cross intermittent streams and the Pit River. There is no significant hydrological advantage to Segment B or the USFS alternatives, and these alternatives would involve substation construction within the Pit River Valley.

Based on review of the comments and our preliminary analysis, the USFS Alturas Alignment would have lower land use impacts than would Alternative Segment B because the USFS Alternative would impact less residences than would Segment B, but it would affect more residences than would Segment A. It would also have greater affects on agricultural land uses. With regard to impact on recreation areas, please note that the impact to the golf driving range south of the Arrowhead Golf Course has less significance than originally presented in the Draft EIR/S. The impact on the golf driving range is now considered to be adverse, but not significant (**Class III**) because the permanent loss of the use of a small portion of the driving range and interference with driving golf balls as a result of the presence of the project structures would not constitute a long-term degradation of the recreational value of a major recreational facility. Please see response to comment GP.23-8 for more detailed information. This alternative would also have the affects of a land use substation in the Pit River Valley.

The comment regarding consistency of the proposed Devils Garden Substation and Alternative Mill Site Substation with existing land use plans and policies is noted. As the site of the proposed Devils Garden Substation is owned by BLM, it does not have zoning or land use designations. Consistency of the Proposed Project with local land use plans and policies is addressed in Section C.8 of the Final EIR/S. See the revised setting and impact analysis for the alternative Mill Site Substation in Section C.8.

The USFS Alturas Alignment would probably have slightly reduced noise impacts relative to Segment B (due to slightly greater distances from sensitive receptors), but still greater than for Segment A due to closer proximity of sensitive receptors. With respect to public safety and health, this alternative alignment would probably have slightly reduced potential EMF exposure effects in comparison with

Segment B over the short term due to greater distances from sensitive receptors (but still greater than for Segment A), with this potential also more likely to grow over the long term due to anticipated residential development. With respect to vandalism and fire hazard, these are considered to be negligible hazards regardless of tie-in and substation location; it is agreed that the 3-minute response time figure is in error - a response time of about 10 minutes is more appropriate (and this amount of time would be greater than the 3 minutes that would be required for the Mill Site). It is disagreed that this alternative would have less potential effects on property values; because of the closer proximity of more residents and the visual effects as discussed below, this alternative would probably have greater effects.

The USFS Alturas Alignment would have traffic impacts similar to those of Alternative Segment B, the primary difference being that the USFS Alignment would not cross Warner Road and it would cross Spicer Lane further to the north than the Segment B alignment. Both the USFS Alignment and Alternative Segment B would have greater traffic impacts than Proposed Segment A because they would cross more roadways than Segment A.

With respect to air safety, the Proposed Segment A passes within 7,000 feet of a runway at the Alturas Municipal Airport, while the USFS Alternative (which is the same as Alternative Segment B in the vicinity of the airport) passes within 3,700 feet of a runway. According to the Federal Aviation Administration (FAA), the Segment A impacts can be mitigated by restricting the height of the structures to 70 feet. The impacts of Segment B, however, cannot effectively be mitigated because the structure heights would have to be reduced to 37 feet to alleviate the safety impacts, which is infeasible for this project. Segment A is, therefore, preferable to Segment B from an aviation safety perspective.

With respect to visual resources, as mentioned previously the USFS Alturas Alignment was not subjected to comprehensive evaluation for reasons described in the EIR/S (Section B.3.4.1). Part D presents a statement comparing the visual impact between Proposed Route Segment A and Alternative Route Segment B and reads: "Alternative Segment B would result in greater visual impacts to the public due to closer proximity to Alturas." This statement is believed to be correct based on the following: Segment B would be in closer proximity to residences north of Hwy 299, the golf course, residences at the north end of Warner Avenue, and residences on Mill Street. Segment B would also be more visible to eastbound motorists on Hwy 299 due to its location in open terrain lacking screening by juniper. This segment (including the Mill Site Alternative Substation Site) would more often appear in views as a prominent foreground and middleground landscape feature than would Segment A. Segment A would be more visible to westbound motorists on Hwy 299 due to the open nature of westerly views to the Proposed Route from Hwy 299.

Section C.13 of the EIR/S acknowledges that the portion of the Proposed Route that crosses the plateau to the east of Daggert Canyon would be visible to portions of northern Alturas and that skylining (structures extending above ridgelines) would occur in those views. The EIR/S characterizes the resulting visual impact as adverse, and acknowledges that structures visible to locations in Alturas would be in the background viewing distance. However, the structures would generally appear as distant features in the landscape, remaining visually subordinate to other built structures in the foreground and middleground

of those views. Mitigation Measure B-21 has been added to the Final EIR/S to provide for a more northerly route across the head of Rock Creek, thus minimizing the visual effect of skylining structures.

However, even given all the above and the more detailed consideration of the U.S. Forest Service (Modoc NF) Alturas Alignment in this Final EIR/S, (see Section B.3.4.1), this alternative does not offer the potential for environmental advantage, but rather is inferior to Proposed Segment A and has been removed from further consideration as a project alternative.

GP.41-8 The EIR/S has considered a very wide range of alternatives, some of which have been given further consideration, based on public comments, particularly as shown in revised Section B.3, Section B.4, and throughout Parts C and D of the Final EIR/S (also see response to comment GP.30-1). With respect to the scoping process, identification and consideration of alternatives were clearly an important component of the process as evidenced by the transcripts of the public scoping meetings and in the various comments received, many of which were related to alternatives. Handouts, that were provided and freely available to all scoping meeting attendees, clearly solicit comments regarding alternatives (copy provided in EIR/S Appendix B), and alternatives were addressed in the initial comments preceding the receipt of public scoping comments at the public scoping meetings (as shown in the meeting transcripts). As for solicitation of comments on the Draft EIR/S, the entire Draft EIR/S was subject to comments, and, of course, this included the numerous sections of the Draft EIR/S that addressed alternatives.

The Advisory Committee concept was a possible option, not included in Aspen Environmental Group's basic proposal; however, this option was not exercised. The public workshops and hearings enabled broader participation in the EIR/S process. Also, the workshops had a station, or booth, largely devoted to alternatives considered in the Draft EIR/S. In addition, Sierra Pacific had no decision making role in the determination of which alternatives were considered and analyzed in the Draft EIR/S. In summary, alternatives, including alternatives suggested by the public and other agencies, have been given a very great deal of attention and consideration throughout the EIR/S process for this project, including active solicitation of input from the public.

GP.41-9 The project objective of improved service reliability to the Reno/Lake Tahoe area would not be affected if hydroelectric power from the Columbia River system is not available since the Proposed Project improves service reliability by increasing system import capacity and providing an alternative route for power to access the Reno area. The availability of hydroelectric power provides SPPCo with an economic benefit, not a reliability need. Section A.6.9.1 has been expanded to provide an update on the current System Operation Review of the Columbia River system; no preferred operation alterative was identified in the Draft SOR EIS, so for the purposes of the analysis presented in Section GP.41-9, the worst case scenario of no hydroelectric power was considered. As noted in Section A.6.9.1, if availability of economical bydroelectric power was eliminated, most of the benefits of the other project objectives would not be affected.

GP.41-10 The Modoc County Planning Commission's subject resolution (Resolution 95-06) is addressed directly in response to comment set PA.16. It does not follow that Segments A and B are

unacceptable since scoping is an ongoing process. However, numerous alternatives besides Segments A and B have been considered (see response to comment GP.30-1). For example, the EIR/S considers an alternative extending eastward from Alturas to the LADWP corridor in northwest Nevada (the Nevada Alternative, in Section B.3.4.6.2), as well as numerous other transmission alternatives (Section B.3.4.6) and the U.S. Forest Service (USFS) Alturas Alignment (see Section B.3.4.1). Further consideration has been given to the Nevada Alternative and the USFS Alturas Alignment, as shown in the corresponding revised sections in the Final EIR/S. In conclusion, a full range of reasonable alternatives to the Proposed Segment A has been considered.

GP.41-11 The EIR/S Section C.13.2.2.4 addresses the potential visual impact to people seeking outdoor recreational activities in the vicinity of the Proposed Route and states with regard to Proposed Route Segment HSØ1-ANP2: "Some views from the back-country roads in the vicinity of the transmission line would be dominated by the transmission line and would result in an adverse impact." As noted by the commenter, the EIR/S further states that the resulting Class III impact would not be significant due to the relatively small number of visitors to this area. The determination that the area receives relatively few visitors was based on consultations with the federal land management agencies responsible for administering public lands in this area (the U.S. Forest Service and Bureau of Land Management). Mitigation Measure V-8 was recommended to reduce the visual impact to distant viewers. Realignment of the Proposed Route, as the commenter suggests, would eliminate the visual impact to viewers at the box canyon. However, a similar visual impact would occur at the location of the realignment.

The Devils Garden Mountain Bike Trail is identified in EIR/S Section C.8.1.2 under Segment A. For further clarification, Sections C.8.1.2 and C.8.2.2.2, Operations Impacts on Recreational Uses, have been revised in the Final EIR/S.

GP.41-12 The visual significance of the Daggert Canyon area was identified in consultations with the U.S. Forest Service and the Bureau of Land Management before preparation of the EIR/S. The visual significance of the area was the basis for establishing two Key Observation Points (KOP) and for preparing three visual simulations (Figures C.13-2B, C.13-2D, and C.13-3B) to assess the potential visual impacts to this area. See also response to comment GP.41-11.

Information on Daggert Canyon has been added to the setting and impact sections. Daggert Canyon is now recognized as a recreation area that would be significantly impacted by the Proposed Project. See response to comment GP.41-11 and Mitigation Measure B-21 of the Final EIR/S.

GP.41-13 It is hereby acknowledged that Crowder Flat Road is also used as a walking trail. The land use impacts on this road are not considered significant.

GP.41-14 Key Observation Point No. 2 was selected (and corresponding visual simulations, Figures C.13-2B and C.13-2D, were prepared) as the closest public viewing point to the private residence in Daggert Canyon. It is acknowledged that the closer the viewer is to the Proposed Project, the more prominent the facilities will appear and the more adverse the visual impact will be. The EIR/S

characterizes the Proposed Project as being located in the middleground distance viewing zone as viewed from KOP No. 2 and the Project's resulting visual contrast as "substantial." This characterization is considered representative of (though not identical to) the visual impact that would be experienced at the private residence in Daggert Canyon. Response to comment GP.126-1 provides a thorough explanation of the visual analysis methodology utilized.

The greatest potential for impact on property value resulting from the Proposed Project is in rural environments, but neither CEQA nor NEPA require mitigation for purely economic impacts. See response to comment GP.2-2 for a discussion of compensation due to degradation of property values. Mitigation Measure B-21 has been added to the Final EIR/S to provide for a more northerly route across the head of Rock Creek, thus minimizing the visual effect of skylining structures.

GP.41-15 The Sierra Pacific survey crew noted in this comment were collecting property line information and section corner locations using helicopter and GPS equipment. At the direction of CPUC, the CDFG was instructed to monitor these surveys to ensure that adequate buffer distances were maintained to protect wildlife resources. Because of staff shortages, Ms. Mosley, a qualified wildlife biologist, was authorized by CDFG to conduct the monitoring for the CPUC.

GP.41-16 Impacts to biological resources as a result of construction of permanent access roads are addressed in Appendix E.5. Loss of deer and antelope habitat, rare plant impacts, and other impacts to biological resources are addressed in Section C.3.2.2 in the Final EIR/S.

The height of pole structures determines the height of the center portion of the transmission line span which is generally several feet lower. Raising or lowering the structures to increase or decrease height of transmission line at the center of the span is not known to affect the potential for avian collisions. The structures themselves are highly visible and collisions are believed to occur primarily in the center portion of the span. However, the factors which seem to affect avian collisions seem to be related to the total number of times birds are required to fly over the transmission lines during feeding or other daily activities.

GP.41-17 See response to comment GP.41-7. Based on the map attached to the commenter's letter, it appears the old mine shaft is outside the survey corridor for this project.

GP.41-18 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications. Constructing and operating a new utility corridor in Modoc County would further increase disturbance to residential uses, degradation of the quality of residential uses, disturbance to recreational uses, degradation of the quality of recreational uses, loss of agricultural land, and interference with agricultural activities associated with operation of existing utility corridors and other industrial development.

GP.41-19 Prairie falcons have been documented in the Daggert Canyon rimrock habitat. Avoidance periods and buffer zones for this species have been included in revised Table C.3-13 . There were no

observations of peregrine falcons in the Daggert Canyon area during spring, fall, or winter surveys. This portion of the project area is not included in the known range for the peregrine falcon.

Based on conversations with local district biologists who have been surveying the area for 20 years, it is unlikely that a peregrine falcon would nest in this vicinity of the Proposed Project. Peregrines may migrate through the area, however. The nearest known peregrine falcon nest in the project vicinity is in the Honey Lake Valley.

GP.41-20 It is assumed that the duration of impact would be roughly 15 years based on the average estimated recovery period for vegetation in the region. The period of compensation was set at 50 years based on the assumption that potential yield from enhancement of offsite compensation lands would diminish over time. After 50 years, it is presumed that no new yield would be realized.

The area of offsite compensation and the values used in the formulas are all subject to final approval by BLM, CPUC, CDFG, USFWS, and USFS. At this time, we are not aware of data that would support the assumption that the period of impact is greater than 15 years.

All significant impacts to rare plants, jurisdictional wetlands, plant communities, and wildlife habitat are mitigated in whole or in part by offsite compensation. The minimum ratio of "acres of compensation" to "acres of impact" used in the EIR/S is 0.9 to 1, and in some cases was calculated at a ratio of 1.5 to 1. These ratios take into account the sensitivity of the habitats affected and the low potential for complete restoration of the affected habitats. A ratio of less than 1 to 1 is justified for temporary impacts because at least 10% of the existing functions and values of the affected biological resources will be restored within 15 years of the project completion. Offsite compensation is only intended to mitigate for the residual impacts that would remain even after restoration is complete. Potential cumulative impacts to biological resources were considered in the assessment of impact significance.

In many cases wildlife habitat fragmentation has occurred in the vicinity of the Proposed Project due to recreational off-road vehicle travel. This issue was considered in the offsite compensation formula used for impacts related to increased access (see Table C.3-11 and C.3-13a). Please also refer to response to comment A.1-42.

GP.41-21 The estimated area of montane meadow wetlands that would be affected at the Pit River crossing incorporates the estimated area of temporary disturbance caused by erection of the structure(s) as currently proposed. Final area of impact will be determined following preconstruction surveys, as specified in the Final EIR/S.

GP.41-22 Rows of trees were considered as a mitigation measure for avian collision impacts. Originally this recommendation was made for the Pit River Crossing at Proposed Segment A and Alternative Segment B. However, upon further consideration and consultation with experts, this mitigation measure was believed to be ineffective and might actually cause birds to be funneled into the open water portion of the crossing where trees would not be present. This funnel action was thought to be detrimental to avian populations and the mitigation measure was not included in the EIR/S.

GP.41-23 This comment refers to Mitigation Measure C-7 under Impact 4 of Section C.4.2.2, which was developed to offset the impact to integrity of setting, feeling, or association of the Infernal Caverns Battleground and Memorial Monument location. Furthermore, as described Mitigation Measure C-7, the land exchange/interpretive development plan is in the conceptual stage and would be subject to an Environmental Assessment by the BLM. The adverse and beneficial impacts of the plan would be addressed in the Environmental Assessment. The BLM, has prepared a draft Management Plan for the Infernal Caverns. The BLM in concert with the Applicant, intends to go forward with implementation of the plan. See response to comment OC.2-1.

EIR/S Section C.8.1.2, under Segment C describes the cultural and recreational resources of the Infernal Caverns Battleground and Memorial Monument. Section C.8.2.2.2 describes the impact to the recreational use of these areas as significant, non mitigable.

GP.41-24 Under the direction of the BLM, the Aspen team ethnographer developed a comprehensive contact list of Native American groups and other individuals based on information provided by the California Native American Heritage Commission, California State Historic Preservation Office, BLM, Coordinator and Director Citizen Alert Native American Program, Sierra Pacific Power Company, and Dr. Clyde Woods, Woods Cultural Research, Inc. None of these groups or individuals identified the names of the individuals cited in the comment letter. However, Mr. Lumas Jackson, Chair of the Pit River Indian Council was contacted.

GP.41-25 See response to comment GP.41-14.

GP.41-26 As noted in the referenced text, the WRCS identifies a "general" north-south corridor through the region of the Proposed Project as a "future," not existing, corridor. As discussed in this text and in response to comment GP.1-3, the existing and proposed corridors presented in the WRCS are identified by the Western Utility Group. The BLM and USFS utilize the corridor studies as reference documents in the development of Land Management Plans and Forest Plans, respectively, and when considering land use decisions. Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications. No where in the EIR/S is it stated that the Proposed Project "follows" an existing or proposed utility corridor.

GP.41-27 The availability of hydroelectric power provides SPPCo with an economic benefit, not a system need. Section A.6.9.1 has been expanded in the Final EIR/s to provide an update on the current System Operation Review of the Columbia River system and how it would affect SPPCo's access to the Pacific Northwest power market. See response to comment GP.41-9.

GP.41-28 The upgrading of the BPA 230 kV transmission line is not a present or future requirement of the Alturas 345 kV Transmission Line Project. Therefore, the consideration of an unplanned modification or upgrading of the 230 kV line at some time in the future is outside the scope of this EIR/S.

GP.41-29 See revisions to Section A.6.9.1 in the Final EIR/S.

GP.41-30 The proposed phase shifter has been sized accordingly for a 300 MW transfer capacity. See revisions to Section A.6.3.3 in the Final EIR/S.

GP.41-31 Section A.6.5 discusses the need to terminate the Proposed Project and identified alternatives at the North Valley Road Substation. See responses to comments GP.1-3 and GP.14-11 for a complete discussion of utilizing the Los Angeles Department of Water and Power (LADWP) 1000 kV line right-of-way in Nevada as a joint utility corridor for the Proposed Project. As noted in Section B.3.4.6.2 of the Draft EIR/S, the 2000-foot separation distance was the BLM-approved separation distance for the Southwest Intertie Project (approved 500 kV line in a 345 kV line corridor). This section has been expanded in the Final EIR/S to elaborate on required utility separation distances through urban areas and resultant environmental impacts. Earthquakes were cited as an "example" of how a simultaneous failure could occur. See response to comment GP.14-17 for a discussion of distributing power to the Reno area from the Tracy Substation via 120 kV lines.

GP.41-32 The cultural resources survey team was provided the EC-660' line list of landowners and notification requirements. Sierra Pacific Power Company was notified in advance of where the survey crews would be in order to comply with individual landowner requirements. Your property was surveyed by the cultural resources crew. If for some reason you were not properly notified, we apologize for any inconvenience this may have caused.

GP.41-33 See response to comment GP.30-1 for a discussion of the numerous alternatives considered and the screening process. See responses to comments GP.1-3 and GP.14-11 regarding use of the LADWP line a joint utility corridor for the Proposed Project.

Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications. See response to comment GP.41-18 for a discussion of utility corridor impacts on Modoc County. See response to comment GP.14-17 for a discussion of distributing power to the Reno area from the Tracy Substation via 120 kV lines.

In conclusion, a full range of reasonable alternatives has been considered. The Modoc County Planning Commission's subject resolution (Resolution 95-06) is addressed directly in response to comment set PA.16.

GP.41-34 See responses to comments GP.41-9 and GP.41-27.

GP.41-35 Rechecking the Federal Emergency Management Agency (FEMA) maps (Panel 825 of 1225, dated 1984) in response to your comment indicates that the narrowest parts of the 100-year floodplain, as designated by FEMA, are indeed along the Proposed Project corridor (Segment A) and the alternative corridor (Segment B). As shown on Table C.7-2, the 100-year floodplain along the Proposed

Project corridor is no more than about 2400 feet wide and will require 1 or 2 structures to span the area. The outline of the floodplain is quite irregular and very wide in places, so if one doesn't know precisely where the Proposed line will be, the floodplain may appear wider.

It should be understood that although it may be advantageous from both an economic and environmental standpoint to avoid floodplains, structures are routinely built in floodplain conditions and perform satisfactorily. These structures do not create any adverse conditions (see list in section C.7.2.1) that cannot be reduced to levels of insignificance through proper design and mitigation. The structures will not significantly affect the floodplain and the flooding will not adversely affect the structures. As discussed in section C.7.2.2.1 several mitigation measures will be implemented to minimize scour, erosion, flooding, and water quality impacts. For example, construction will occur only during times of low water (Mitigation Measure H-3). Other mitigation measure will be H-1, H-2, H-4, H-5, and H-6. The entire design, construction, and operation of the project will be reviewed and monitored by the responsible government agencies and by environmental monitors who will be in the field to ensure that the proper procedures are followed.

SET # GP.42 BRANDON GENTRY

GP.42-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1. Section A.6.2.2 provides a discussion of SPPCo's existing supply system. The use of geothermal resources as an alternative to the Proposed Project is discussed in Section B.3.4.4 of the EIR/S.

SET # GP.43 JUDY AND STEPHEN THEEMIS

GP.43-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.44 SHIRLEY AND CARL BACKMAN

GP.44-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.45 RICHARD W. HEWITT

GP.45-1 Comment noted. Please see responses to comments GP.1-3, GP.6-1 and GP.14-11.

SET # GP.46 HARRISON BARDSON

GP.46-1 Please see response to comment GP.25-1.

GP.46-2 Comment noted. Please see responses to comment GP.28-1, GP.30-1 and GP.52-3.

SET # GP.47 LEA NEILSON MCMULLEN

GP.47-1 Comment noted.

SET # GP.48 MARGUERITE PEREZ

GP.48-1 Please see response to comment GP.28-1.

GP.48-2 See response to comment GP.30-1.

SET # GP.49 KELLE S. RAY

GP.49-1 Please see responses to comments GP.41-7 and GP.41-10 for a discussion of Modoc County alternatives. Note that Alternative Segment B, which is analyzed fully in the EIR/S, and the USFS Alturas Alignment both avoid the subject ridgeline. The USFS Alignment has also been given further consideration, as presented in a revised Section B.3.4.1 in the Final EIR/S.

See response to comments GP.6-1 and GP.10-1 for discussions of project impacts and undergrounding of transmission lines, respectively.

SET # GP.50 BILLY AND MARLENE ROBERTS

GP.50-1 Section E.3.3.3.5 has been added in the Final EIR/S to include a discussion of the growth inducing effects of expanded telecommunications within the Proposed Project region.

SET # GP.51 DAVE STAMPANONI

GP.51-1 Section C.8.1.2, Segment X - Washoe County, has been expanded to include a discussion of potential land use impacts at Rancho San Rafael Park. While portions of the Proposed Project may be visible from Rancho San Rafael Park, much of the Proposed Project from Angle Point YØ1 to XØ3 would be screened from view by intervening terrain.

GP.51-2 Please see responses to comments FP.8-2 and GP.52-2.

GP.51-3 Transmission line structures offer perching opportunities for raptors even without modification. However, in some cases there are special status mammal and bird species in the vicinity of the Proposed Project which require protection. In these areas, Mitigation Measure B-23 (EIR/S Section C.3.2.2.3, under Impact 13) requires perch guards to prevent raptors from using the transmission line structures as perches from which they can prey upon protected species.

GP.51-4 See response to comment GP.10-1.

SET # GP.52 ELMER R. RUSCO

GP.52-1 Please see response to comment GP.51-1.

GP.52-2 We understand your concern for your community, family, and friends and your comments will be considered in the final decision on this project. A literature review on the health effects of magnetic fields is included in the EIR/S in Section C.10.1.5 and the current EMF Mitigation policy in California is discussed in Section C.10.2.3.1. See also response to comment GP.8-2.

As presented in Table C.8-1, all residences within the vicinity of the Proposed Project would be at least 300 feet away from the transmission line (with the exception of a single-family residence on Segment L and an apartment complex on Segment X). As presented on Figures C.10-3 through C.10-10 in the EIR/S, the electric and magnetic field values at 300 feet from the project centerline would be less than 0.1 kV/m and less than 2.0 mG (normal and peak loading), respectively, for all structure configurations (230 kV vs 345 kV, single-pole vs. H-frame). At a distance of 300 feet, the electric and magnetic field values are comparable to common household appliances (see Tables C.10-1 and C.10-2).

GP.52-3 Section A.6.2.3 summarizes the existing and future limitations of SPPCo's system. Service limitations currently are being experienced for existing mining loads. Future (Summer, 1997) limitations are based on projected growth of the Reno/Lake Tahoe region.

GP.52-4 See response to comment GP.10-1.

SET # GP.53 CAROLE L. BOHN

GP.53-1 Comment noted. Please see response to comment GP.28-1. There are no known effects of EMF on ground or surface water.

GP.53-2 Comment noted. See response to comment GP.30-1.

SET # GP.54 BEVERLY AND EDWARD EASTWOOD

GP.54-1 Comment noted. Please see responses to comments GP.1-3 and GP.14-11.

SET # GP.55 EDWARD GUILIANO

GP.55-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.56 DOREEN ORNER

GP.56-1 Discussion with County Assessors indicates a belief that few properties would be measurably affected by the proposed power line. The recommended mitigation measure is considered to be appropriate and consistent with CEQA and NEPA, which contain no requirements to mitigate for purely economic impacts.

SET # GP.57 LOTTIE MAIN

GP.57-1 Comment noted. Please see response to comment GP.6-1 .

SET # GP.58 DOUGLAS NEWMAN

GP.58-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.59 KIMBERLY WIRSHING

GP.59-1 Comment noted. Please see responses to comments GP.8-2 and GP.52-2.

GP.59-2 See response to comment GP.30-1.

GP.59-3 The Proposed Project would be in compliance with all of the guidelines and requirements of the FAA. It would have an impact on aviation safety and operations; however, the impacts would not be significant according to the FAA because the structures and wires would be below the FAA-defined height thresholds for navigable airspace. Although there would be an adverse impact, to the flight paths for general aviation and emergency aircraft, the flight paths would not be destroyed, and as such the impact is not considered to be significant (Class III).

SET # GP.60 TERRY KIRBY

GP.60-1 Comment noted. Please see response to comment GP.28-1.

SET # GP.61 ANN B. MARKS

GP.61-1 Upon further review, Mitigation Measure L-13 has been included in the Final EIR/S as a "recommendation" due to the fact that neither the CPUC nor the BLM have the authority to implement or enforce setbacks on future projects that are not under their jurisdiction. At their discretion, local jurisdictions may implement this measure by establishing setbacks through local ordinances.

Please see response to comment GP.132-4 regarding impacts to property values.

SET # GP.62 VINCENT MANGER

GP.62-1 Comment noted. Please see response to comment GP.28-1.

SET # GP.63 LARRY D. SKINNER

GP.63-1 Please see response to comment GP.25-1.

GP.63-2 Comment noted. See response to comment GP.28-1.

GP.63-3 See response to comment GP.30-1.

SET # GP.64 REBECCA M. ZATARAIN

GP.64-1 Key Observation Point No. 17 was established on Copperfield Road in the vicinity of Longview Lane. The visual analysis for this key observation point is presented in Section C.13.2.2.4, under Segment X, of the EIR/S. A visual simulation of the Proposed Project is presented as Figure C.13-17B. As shown in this figure, the Proposed Project would traverse the lower slopes of Peavine Peak just up from the existing railroad tracks.

GP.64-2 Potential impacts to wildlife resources related to construction of the proposed transmission line are discussed in Section C.3.2.2.3 of the EIR/S. Mitigation Measures B-9 through B-23 serve to reduce impacts to wildlife to levels that are not significant. The measures include preconstruction surveys to identify occupied nests, avoidance periods for sensitive habitats, buffer zones during construction and operation (helicopter flight restrictions), and biological monitors to verify that mitigation is implemented as intended.

GP.64-3 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.65 KATHY DUNN

GP.65-1 The impacts to Modoc County due to the Proposed Project and alternative alignments are summarized in Part D, Alternative Comparison, of the EIR/S. Please see response to comment GP.6-1 for a summary of project impacts.

SET # GP.66 BETTY SCHUMACHER

GP.66-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.67 LA VELLE BROGAN

GP.67-1 The crackling sound associated with high voltage transmission lines on damp days is a phenomenon known as a "corona". This usually occurs at the structure locations rather than in the middle of the span. In order to alleviate this effect, it is standard procedure to install a fixture known as a corona ring where the transmission line attaches to the structure. Corona rings will be installed on structures throughout the length of the Proposed Project.

SET # GP.68 JOHN RAY

GP.68-1 Your concerns with radio interference are well-founded. Section C.10.2.3.2 of the EIR/S discusses radio and television interference. Within this section it is noted that the Applicant has a radio and television interference program in place that will assist residences near the line in resolving any reception interference that occurs due to this project.

SET # GP.69 MICHAEL FLETCHER AND HOWARD HANSEN

GP.69-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.70 WILLIAM S. BOGLE

GP.70-1 Comment noted. Please see response to comment GP.28-1.

SET # GP.71 STEPHEN G. LEONARD

GP.71-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.72 MAUREEN OPPERMAN

GP.72-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.73 MARIAM D. LANG

GP.73-1 Please see responses to comments GP.1-3 and GP.14-11. .

SET # GP.74 TARA A. AND GEORGE S. BAY

GP.74-1 Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.75 RON AND DEBI CHRISTENHUSZ

GP.75-1 Comment noted. Please see responses to comments GP.28-1, GP.30-1, and GP.52-3.

Golden eagles are a mobile species. Nest sites observed in use by golden eagles during one nesting season may not be used by golden eagles the following year. Golden eagles establish pair bonds and begin to build or occupy nest sites each year around March. Nests built by golden eagles may be used by owl species, magpies, or other raptor species. Therefore, it is difficult to map nest sites without a concerted effort over a nesting period. In contrast, pronghorn antelope return to the same kidding areas each year. These areas have been mapped and are a much more stationary resource.

Preconstruction surveys, specified in Mitigation Measure B-14, would determine golden eagle and other birds of prey nesting in the project area. These nest sites would be protected during construction of the Proposed Project. Construction restrictions applied in the vicinity of kidding areas are listed in Table C.3-12 of the EIR/S.

SET # GP.76 DON, JOY, AND JAY ANHOLD

GP.76-1 Please see responses to comments GP.28-1 and GP.67-1 .

GP.76-2 As pointed out by the commenter, there are earthquake faults in proximity to the proposed Alturas Transmission Line. Such faults are quite common in the western U.S. and virtually no project of this magnitude can avoid them completely. However, it is possible to design structures to resist collapse during earthquake shaking and, in fact, the design of the structures for withstanding stresses imposed by winds are generally greater than the stresses that would be caused by most earthquakes. Mitigation Measures G-2 through G-6 (EIR Section C.6.2.2.1) discuss investigations and design measures that would be undertaken to reduce the impacts of faulting and earthquakes to a level of non-significance.

It should be emphasized that large earthquakes on the faults in this region have exceedingly long recurrence intervals which means that the time between destructive earthquakes is commonly several thousand years to more than 10,000 years. Considering these long recurrence intervals the likelihood is very small that a large earthquake will occur during the lifetime of the transmission line.

Furthermore, if a structure were to topple, power would automatically be shut off and any damage should be minor, as evidenced by the minimal, if any, damage that has occurred from transmission lines during the major earthquakes of this century. There would be no ecological "disaster".

GP.76-3 See responses to comments GP.28-1 and GP.30-1.

GP.76-4 The discussion of the impact of corona noise under "Operational Impacts" in Section C.9.2.3 has been substantially expanded. The conditions under which a significant noise impact could occur are precisely stated. No residences in the Horizon Hills area meet the conditions for a significant impact from corona noise because they are more than 1,200 feet from the proposed transmission line corridor.

GP.76-5 See responses to comments GP.14-17, GP.30-1, and GP.52-3.

GP.76-6 The use of geothermal resources as an alternative to the Proposed Project is discussed in Section B.3.4.3 of the Final EIR/S.

GP.76-7 See response to comment GP.25-1.

SET # GP.77 CAMP FAMILY

GP.77-1 Comment noted. Please see responses to comments GP.6-1 and GP.30-1.

SET # GP.78 SEVERIN BALDA AND MARIA MARSANO-BALDA

G.P.78-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1. The proposed transmission line would span the creek area and, therefore, there would be no biological impacts to this area. Also see Mitigation Measures B-14 and B-16 in Section C.3.2.2.3 of the EIR/S regarding protection of wildlife resources, including raptor nests, during construction. Meadowlarks are not a

special status species in the project area. Therefore, they are not required to be addressed in this document. However, nesting habitat for this species will not be affected by the Proposed Project.

SET # GP.79 PAUL N. AND DOROTHY O. REIFSCHNEIDER

GP.79-1 Comment noted. Please see response to comment GP.28-1.

SET # GP.80 PAMELA ROBERT

GP.80-1 Comment noted. As discussed in Section C.13.2.2.3 and illustrated on Figure C.13-18B, in the vicinity of University Ridge, the Proposed Project would appear as a prominent feature in the middleground distance zone. Although the proposed facilities would be very prominent as viewed from several locations, the anticipated visual impact would be adverse, but not significant (Class III) due to the disturbed nature of the existing landscape and presence of urban development and several similar built features.

GP.80-2 Your comments on the effects of EMF on children are noted and will be considered in the final decision. Please see response to comment GP.8-2 .

SET # GP.81 DOUG GOODALL

GP.81-1 Comment noted. Please see responses to comments GP.6-1 and GP.30-1.

SET # GP.82 SUSAN MC CLAIN

GP.82-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.83 DOUG HAMMERSON

GP.83-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.84 SIMONS FAMILY

GP.84-1 Comment noted. Please see responses to comments GP.14-17, GP.28-1, GP.30-1, and GP.52-3.

SET # GP.85 JACK AND JENNIFER RHODES

GP.85-1 Comment noted. Please see responses to comments GP.10-1, GP.28-1, GP.30-1, and GP.59-3.

SET # GP.86 ROBERT E. WINCHELL

GP.86-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.87 JESSE A. AND DOLORES J. CASTRO

GP.87-1 Comment noted. Please see responses to comments GP.6-1 and GP.30-1.

SET # GP.88 RONALD AND ROSEMARIE BEJCEK

GP.88-1 The side-by-side comparison between the proposed route through Secret Valley and the East Secret Valley Alignment has been considered further and documented in a revised Part D, in the Final EIR/S.

SET # GP.89 WES AND MONIQUE HERBST

GP.89-1 Please see responses to comments GP.10-1, GP.28-1, GP.30-1, and GP.59-3.

We understand your concern about potential health risks for your family. In your letter you wanted to know the types of tests that have been performed on EMF. A brief description of some of the studies and tests performed to date were addressed in the EIR/S in Section C.10.1.5. A more comprehensive analysis of studies performed on EMF is available in a book titled "Health Effects of Low-Frequency Electric and Magnetic Fields" which was prepared by an Oak Ridge Associated Universities Panel for The Committee on Interagency Radiation Research and Policy Coordination and published in June of 1992.

SET # GP.90 RICHARD COOK

GP.90-1 Comment noted. Please see response to comment GP.30-1.

SET # GP.91 ROY BOGART

GP.91-1 Comment noted. Please see response to comment GP.30-1.

SET # GP.92 KEN BOGART

GP.92-1 Comment noted. The land use and visual impacts of the Proposed Project in the Long Valley area are discussed in Sections C.8 and C.13 of the Final EIR/S. Please see response to comment GP.30-1.

SET # GP.93 ROBERT AND CAROLE HEINZ

GP.93-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.94 FLAVIA S. POOLE

GP.94-1 Comment noted. Please see responses to comments GP.6-1 and GP.30-1.

SET # GP.95 SHANNA L. BRITTON

GP.95-1 The issue of ruts formed during wet weather was examined in detail by BLM and CDFG soil scientists and botanists during the Tuscarora Project. Based on this examination, the standard for determining if the vertisol soils were too wet for construction would be ruts of 6" or more, for more than 100 feet. The rationale on the 6" depth is due to the shrink-swell nature of the vertisol soils. Even when the vertisols are bone dry, vehicles will leave ruts of 2 to 3 inches because of the "puffy" nature of the top portion of these soils. The 6" standard is a reasonable approach to determining if the vertisol soils are "too wet". If the ruts are more than 100 feet long, the wet soil conditions are likely to be widespread. On non-vertisol soils (everything else), 3 inches was selected as a reasonable depth to determine if the soils are "too wet."

SET # GP.96 CATHY S. ENDO

GP.96-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.97 RUTH H. HART

GP.97-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1. Section A.6 of the EIR/S discusses the need and economic benefits of the Proposed Project.

SET # GP.98 LARRY AND KATHY BROWN

GP.98-1 The proposed crossing of the Pit River (by Segment A) appears, on balance, to result in the lowest overall impact relative to possible crossing points either east or west from Segment A. With respect to Infernal Caverns (for which the Battleground Memorial Monument is located approximately 1.4 miles to the east of the proposed route), the reader is referred to Section C.4.2.2 (of the EIR/S) for a discussion of mitigation of impacts on site context. For the area at the head of Daggert Canyon, an alternative route and reduced tower height have been given further consideration in the Final EIR/S (see Mitigation Measure B-21).

SET # GP.99 TOM AND LYNDA GRIMME

GP.99-1 All potential jurisdictional wetlands in the project study corridor were delineated according to the methods described in the US Army Corps of Engineers (USACE 1987) Wetland Delineation Manual. This manual relies on indicators such as soils, drainage patterns, and vegetation. Jurisdictional wetlands exhibit diagnostic characteristics even during a drought.

Although vernally wet areas occur in the study area for Segment A of the Proposed Project, these sites do not meet the criteria for jurisdictional wetlands as defined by the USACE. Some of the stream crossings such as Rock Creek may be considered jurisdictional waters, but do not possess adjacent wetlands. The Proposed Project will not require construction of a new vehicle crossing at Rock Creek. Therefore no direct impacts to this stream and its adjacent habitats are anticipated.

SET # GP.100 DOLORES RAY

GP.100-1 Please see response to comment GP.25-1.

GP.100-2 Comment noted. See responses to comments GP.28-1 and GP.30-1.

GP.100-3 See responses to comments GP.8-2 and GP.52-2.

GP.100-4 The impact of corona noise is discussed in detail in response to comment GP.76-4, and that from wire whistling in response to comment TR.24-1. There would occur no significant noise impact at a distance of 2000 or more feet from the proposed transmission line.

SET # GP.101 FRANCIS BALLARD

GP.101-1 Please see responses to comments GP.20-4, GP.23-6, GP.41-7, and GP.41-11.

The sentence referred to in this comment explains that interference with adjacent land uses (i.e., increases in air emissions, noise, traffic, or other land use disturbances) would be less in the rural area of Modoc County crossed by the proposed route than in a more developed area. It was not meant to imply that the visual impacts of the proposed line would not be important due to the rural nature of the proposed route in Modoc County.

SET # GP.102 THOMAS R. ANDERSON

GP.102-1 Comment noted. Segment Z has been considered to be environmentally superior to the corresponding portion of Proposed Segment W. However, a further shift of the route to the east would bring about greater impacts due to ground and habitat disturbance associated with access and construction of the transmission line, as well as potentially increased visual impacts with greater elevation of the line.

GP.102-2 The proposed route and alternative routes within the subject area have been subjected to detailed environmental analysis in the EIR/S. In addition, numerous alternatives to routing in the subject area have been considered in the EIR/S, including the No Project Alternative, various transmission alternatives for bringing power in from the east (see Section B.3.4.6), generation alternatives (Section B.3.4.4), system enhancement alternatives (Section B.3.4.5), and alternative alignments that would pass to the east of Petersen Mountain (Eastside Routes 1 and 2, Section B.3.4.1)). Further consideration has been given to the Nevada Alternative and Eastside Routes 1 and 2 in revised Sections B.3.4.6 and

B.3.4.1, respectively, in the Final EIR/S. No alternatives were considered to be superior to the proposed route in combination with Segment Z.

SET # GP.103 MR. AND MRS. C. WILSON

GP.103-1 Comment noted. Please see responses to comments GP.6-1, GP.8-2, GP.30-1, GP.51-1, and GP.80-1.

SET # GP.104 JEROME BYCZEK

GP.104-1 Please see responses to comments GP.25-2 (second paragraph) and GP.64-1.

GP.104-2 The impact of corona noise is discussed in detail in response to comment GP.76-4. No significant noise impacts would occur at a distance of 2000 or more feet from the proposed transmission line.

GP.104-3 See response to comment GP.20-2.

GP.104-4 Aside from the temporary disturbance and indirect impacts associated with construction of the Proposed Project, there would be no impacts to the species listed in this comment. The transmission line would be suspended over wildlife habitats, and terrestrial species, such as the ones noted in this comment. These species would not be impacted by the overhead lines. A transmission line currently exist in the Peavine Peak area to the southwest of Horizon Hills. Populations of a variety of wildlife species, including mountain lions, have not suffered losses.

See response to comment GP.2-2 for a discussion of property value impacts.

GP.104-5 The energized conductors of the transmission line are protected from lightning strikes by the shield wires. Any lightning strikes sustained by the shield wires are routed safely to ground through the grounded steel structures. The possibility of forest/range fires caused by lightning strikes which occur away from the line is the same as if the line was not located in the area. See response to comment GP.19-6 regarding impacts due to high winds.

GP.104-6 See response to comment GP.52-3 for a summary of SPPCo's existing and future system limitations.

SET # GP.105 CRAIG MILLER

GP.105-1 Bird flight diverters would be attached to the shield wires. The transmission lines themselves are several inches thick and are visible. For clarification, please see revisions to Section C.3.2.2.3, Bird Collisions, in the Final EIR/S. Appendix E.2 of the Draft EIR/S discusses documented studies of bird electrocution/collision potential in more detail.

GP.105-2 Studies which document collision rates involve surveys for dead birds beneath transmission lines. Collisions are not usually observed. Researchers have noted a higher incidence of bird deaths on days when visibility is poor due to weather conditions. A percentage of the collisions are expected to occur at night or during inclement weather.

In general, migrating birds fly at very high altitudes. Such flight behavior would not be affected by transmission lines at the heights indicated in the project description. Also, during inclement weather migration is delayed as flight is difficult under such conditions. In addition, it is acknowledged in the Final EIR/S that during periods of poor visibility the effectiveness of bird flight diverters is reduced.

GP.105-3 Please see Section B.2.1 of the Final EIR/S regarding route selection and the process used to avoid routes that would significantly impact biological resources. Please also note that the transmission line would be maintained on an annual basis and impacts to resources as a result of these activities have been included in the impact analysis. The transmission line would be suspended over wildlife habitat as you have noted. Terrestrial species would not be impacted by this overhead structure. The lines themselves and the structures would impact avian species and some of the prey species of raptors. This is discussed in Section C.3.2.2.3.

GP.105-4 Please see response to comment GP.135-14. Cumulative impacts to cultural resources are discussed in Section 4.2.3 of the EIR/S. Supplemental cultural resource surveys have been conducted on proposed construction access road improvements. The results of this study are provided in Appendix I of the Final EIR/S.

GP.105-5 See responses to comments GP.6-1 and GP.30-1.

SET # GP.106 JAMIE ERKIAGA

GP.106-1 The impacts mentioned in this comment (e.g., visual, land use) have been fully assessed in the EIR/S. In addition, numerous alternatives to the Proposed Project Segment A and Alternative Segment B in the Alturas area have been considered. For example, the EIR/S considers an alternative extending eastward from Alturas to the LADWP corridor in northwest Nevada, as well as numerous other transmission alternatives (see Section B.3.4.6.2), and the U.S. Forest Service (USFS) Alturas Alignment (Section B.3.4.1). Further consideration has been given to the Nevada Alternative and the USFS Alturas Alignment, as well as alternative routing at the head of Daggert Canyon, in the corresponding sections of the Final EIR/S. In conclusion, a full range of reasonable alternatives has been considered. Modoc County comments and resolutions are addressed directly in response to comment set PA.16.

SET # GP.107 CAROLYN LONGLAND

GP.107-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.108 WILLIAM S. LONGLAND

GP.108-1 Mitigation measures for plant and animal impacts are described in Section C.3 of the EIR/S. Principal impacts to special status species or unique plant communities have been almost entirely avoided in the project design by shifting the centerline away from these resources. Mitigation Measure B-2 prescribes mitigation for impacts to the altered andesite plant community; no impacts to the altered andesite buckwheat are anticipated. Construction activities will be monitored to prevent inadvertent impacts to special status plant populations or the altered andesite plant communities.

Mitigation Measure B-8 specifies the steps that will be taken to prevent introduction or dispersal of non-native species such as medusahead (*Taeniatherum caput-medusae*).

GP.108-2 Please see responses to comments GP.30-1 and GP.52-3.

SET # GP.109 MARY TOLENO

GP.109-1 The referenced text in the Executive Summary does not present rationale for selection of the proposed route; rather, it summarizes the results of the visual analysis presented in Section C.13. The referenced passage does not indicate that there are few numbers of viewers along the entire route, but describes those back-country portions of the route generally accessible only by four-wheel drive vehicles. The next paragraph in that section summarizes the impact of those portions of the Proposed Project that are highly visible: "Portions of the proposed route would cause significant, unmitigable visual impacts due to the transmission line's visual prominence as a foreground feature in areas characterized by high scenic quality and high visual access (characteristically along major travel corridors or in the vicinity of established communities). In such locations the transmission line would typically result in a significant degradation of scenic quality and cause a moderate to strong degree of visual contrast and landscape change." See Section C.13.2.2 of the EIR/S for more details on the visual impacts of the Proposed Project. See the second paragraph in response to comment GP.28-1 for a description of the decision making process for the Proposed Project.

GP.109-2 Please see response to comment GP.30-1.

GP.109-3 See response to comment GP.52-3.

GP.109-4 Comment noted. Sections C.8.2.2 and C.13.2.2 of the EIR/S discuss the impacts of the Proposed Project on land use and visual resources, respectively. Response to comment GP.6-1 summarizes the construction and operation impacts of the Proposed Project. A discussion of the electric and magnetic field impacts of the Proposed Project is included in response to comment GP.8-2. Section C.3.2.2.3 discusses the impacts of the Proposed Project on wildlife, including bird electrocutions. The aviation impacts of the Alturas Transmission Line are discussed in Sections C.12.2.2.1 and C.12.2.2.2.

GP.109-5 See response to comment GP.14-17.

GP.109-6 The use of geothermal resources as an alternative to the Proposed Project is discussed in Section B.3.4.4 of the EIR/S. Response to comment GP.14-35 discusses SPPCo's historic and future use of geothermal resources. With respect to alternatives considered, see response to comment GP.30-1.

GP.109-7 There is a system of northwest-trending faults along the northern flank of Peavine Peak (south of Horizon Hills). These faults are shown on Base Map 32 of 33 at the end of Volume I of the Final EIR/S. As shown on the maps, some splays of these faults cross the Proposed Project route. These faults are short and discontinuous and do not have any evidence of being active within at least the past 10,000 years. Such long elapsed times since these faults were active indicates that earthquakes and surface ruptures are not likely to occur during the lifetime of the Proposed Project. Their short, discontinuous nature indicates that they are not capable of generating large earthquakes or large surface displacements. In the improbable event of fault reactivation, the affects of displacements and earthquakes on such small faults are not likely to cause significant damage or collapse of the transmission line because the structures are designed to withstand much more frequent and stronger stresses such as strong winds. Mitigation Measures G-2 through G-6 discuss investigations that will be undertaken to reduce the impacts of faults and earthquakes to a level of non-significance. Further discussions relevant to this matter are in response to comment GP.76-2.

Burying the lines would not lessen the risks due to faults or earthquakes and in fact could make them more severe by constraining the ductility (flexibility) inherent in an elevated transmission line system; power lines strung on poles have a great amount of flexibility that can accommodate large lateral displacements between structures. In fact, given the hazardous substances required for underground cooling systems, the environmental impact of a ruptured underground transmission line would be more severe than that for an above-ground facility (see Section B.3.4.5).

GP.109-8 The presence of a high voltage transmission line in the immediate vicinity of a fire does increase the hàzard associated with fire suppression activities, specifically the operation of aircraft in the vicinity of the line or the operation of heavy equipment beneath the conductors (lines). However, it should be noted that prior to initiation of fire suppression activities, a control plane flies over the area of the fire to scout the fire and locate potential hazards. Furthermore, Hazard Maps maintained at Fire Fighting Dispatch Centers also show the location of transmission lines. Therefore, all fire fighting personnel are made aware of the presence of the lines and appropriate precautions are taken. In the event of an actual forest/range fire in close proximity to the transmission line, the line would be de-energized as discussed in Section C.10 of the EIR/S.

GP.109-9 Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.109-10 New access roads and grading would be required in some locations to provide access to the project corridor for construction and maintenance activities, although existing roads would be used where available to minimize the need for new access roads. However, in the vicinity of Peavine Peak only limited widening of existing 4-wheel drive roads and intermittent blading of rough areas for

temporary overland routes would be required (see Table B-4 of the Final EIR/S). The new access roads would likely result in an increase in recreational activity by motorcycles and four-wheel drive vehicles. Although this is not necessarily a traffic impact, it could be considered adverse by nearby residents.

GP.109-11 See response to comment GP.2-2. See revisions to Mitigation Measure S-1 in the Final EIR/S.

GP.109-12 See response to comment GP.28-1.

GP.109-13 Electrocution of large birds of prey, raptors, is addressed in Section C.3.2.2.3 of the EIR/S. The mitigation proposed for this impact includes perch deterrents at structures and at substations which will make such places unattractive landing sites (see Mitigation Measure B-19). Also, powerlines will be marked with bird flight diverters (Mitigation Measure B-20). Hawks, magpies, and other birds in the area will not be decimated as a result of the Proposed Project.

GP.109-14 See responses to comments GP.14-17, GP.28-1, and GP.30-1.

GP.109-15 As discussed in Section B.3.4.6.2, the feasibility of the Pacific DC Intertie alternative is questionable given the lack of existing capacity on the LADWP 1000 kV DC transmission line. Section B.3.4.6.2 of the Final EIR/S concludes that because a transmission line would need to be constructed from Fernley to the North Valley Road Substation, traversing northern Sparks and Reno, the Pacific DC Intertie alternative could not reduce or eliminate the environmental impacts of the Proposed Project and therefore, was eliminated from further consideration. See response to comment GP.30-1 for a summary of CEQA alternative screening criteria.

SET # GP.110 ALICE N. TRAIL

GP.110-1 Please see responses to comments GP.25-2 (second paragraph) and GP.64-1.

GP.110-2 Your comments on EMF have been noted and will be considered in the final decision. See response to comment GP.8-2.

GP.110-3 See response to comment GP.28-1 for a summary of project construction and operation impacts. Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.110-4 See responses to comments GP.14-17, GP.30-1, and GP.52-3. Because the Proposed Project alignment traverses a less densely populated area than the transmission alternatives that traverse northern Sparks and Reno, land use impacts would be less significant.

GP.110-5 Section C.7.2.2 of the EIR/S discusses the impacts of the project on both ground water and surface water, and presents several mitigation measures that will be undertaken to minimize the

impact of the project on existing conditions. Substantial effort would be expended during construction not to alter stream beds or ground water, under the guidance of environmental monitors. The configuration of support structures is shown on Figure B.2-3 of the EIR/S (H-frame structure is the most common type of structure to be used). As shown on that illustration, the foundations for the powerline structures would range from 10 to 30 feet deep and would have a diameter of 6 to 12 feet. The average spacing between individual structures would be about 1200 feet. This shallow embedment depth and wide spacing amounts to little more than pin-pricks in the upper surface of the rocks and soils of the region and would not alter regional ground water or surface water flow paths.

GP.110-6 See response to comment GP.109-10.

SET # GP.111 TERRY CLICK

GP.111-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1.

SET # GP.112 JOHN LUNDEMO

GP.112-1 Please see response to comment GP.28-1. Your comment is noted regarding the presence of traditional Native American sacred places in the canyons and the historical use of the area by Basques sheepherders. To date no specific locations have been identified within the study corridor that would be affected by the Proposed Project. At its closest, Poeville is over one mile distant from the project and would not be significantly affected by the introduction of the proposed facility at this distance.

SET # GP.113 MARY R. HERMAN

GP.113-1 Comment noted. Please see responses to comments GP.6-1, GP.8-2, and GP.10-1.

SET # GP.114 ELSIE AND STEVE PIMKO

GP.114-1 Comment noted. Please see response to comment GP.28-1. Section A.6 of the EIR/S discusses the economic benefits of the Proposed Project. Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.114-2 The Proposed Project would not significantly affect the surface water or ground water on the slopes of Peavine Peak. See responses to comments GP.110-5 and OC.13-2.

SET # GP.115 JENNY BOOTH

GP.115-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1 for a discussion of project impacts and summary of alternatives considered, respectively. See response to comment GP.25-1 for a discussion of notification efforts. Section E.3.3, Potential Growth-Inducing Effects, has

been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

SET # GP.116 MARY WION

GP.116-1 Proposed Segment A would require the construction of approximately 1 mile of new access road and approximately 1 additional mile of overland travel. Alternative Segment B, which would result in smaller impacts to plant communities and special status species, was the biologically preferred route alignment over Segment A. However, adoption of Proposed Segment A was based on a comparison of the potential impacts for all resources associated with Alternative Segment B and Proposed Segment A, not just biological resources (see Part D of Final EIR/S); Proposed Segment A would avoid significant, unavoidable Class I land use and visual impacts associated with Alternative Segment B.

SET # GP.117 EDWARD A. AND KATHERINE M. CAMPBELL

GP.117-1 Please see responses to comments GP.25-2 (second paragraph) and GP.64-1 for a discussion of visual impacts. Response to comment GP.2-2 discusses property value impacts.

GP.117-2 The impact of corona noise is discussed in detail in response to comment GP.76-4, and that from wire whistling in response to comment TR.24-1. No significant noise impacts would occur at a distance of 2000 or more feet from the proposed transmission line.

GP.117-3 See response to comment GP.52-2 and GP.68-1.

GP.117-4 Comment noted. See response to comment GP.28-1 for a summary of project impacts in the Peavine Peak area.

SET # GP.118 MIKE AND MINDY BELL

GP.118-1 Comment noted. Please see response to comment GP.28-1.

SET # GP.119 ROBERT E. TUCKER

GP.119-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1 for a discussion of project impacts and summary of alternatives considered, respectively. Response to comment GP.52-3 summarizes the existing and future limitations of SPPCo's system.

GP.119-2 The structures for the Alturas Transmission Line would be made of tubular steel, with the exception of the wood structures connecting the BPA power line to the Alturas Substation. The minimum distance from the ground to the conductors will be 34 vertical feet at the maximum point of sag; minimum distance from the ground to the conductors at the structures would be about 45 feet.

SET # GP.120 BRENDA CRISTANI

GP.120-1 We appreciate your concern over the possible health effects of EMF. As you state in your letter, research has and is being done on many health effects that may be associated with magnetic fields. Section C.10.1.2.3 of the Draft EIR/S includes a summary of the significant research on EMF health effects concluded to date. In addition, a comprehensive analysis of studies performed on EMFs is available in a book titled "Health Effects of Low-Frequency Electric and Magnetic Fields," which was prepared by An Oak Ridge Associated Universities Panel for The Committee on Interagency Radiation Research and Policy Coordination and published in June of 1992. Please see also response to comment GP.8-2.

Fire hazard would increase slightly, but insignificantly with application of Mitigation Measures P-3 through P-7, due to the presence of the transmission line. See Sections C.10.1.4.3 and C.10.2.3.3 of the EIR/S and response to comment GP.19-6 for a complete discussion of the fire hazard imposed by the Proposed Project.

GP.120-2 The impact of corona noise is discussed in detail in response to comment GP.76-4, and that from wire whistling in response to comment TR.24-1. No significant noise impacts would occur at a distance of 2000 or more feet from the proposed transmission line.

GP.120-3 See responses to comments GP.14-17, GP.30-1, and GP.52-3.

GP.120-4 See response to comment GP.10-1.

GP.120-5 Section A.6.5 discusses how the Proposed Project would improve system reliability as an emergency backup source.

GP.120-6 See response to comment GP.52-3. Section A.6.4 and A.6.5 describe how the Proposed Project will facilitate SPPCo emergency response services.

GP.120-7 See response to comment GP.8-2.

SET # GP.121 CARI LOCKETT

GP.121-1 Please see response to comment GP.28-1. Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/s to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.121-2 See responses to comments GP.30-1 and GP.52-3.

SET # GP.122 ELVIRA PICOTTE

GP.122-1 Please see responses to comments GP.41-11 and GP.41-12.

GP.122-2 Identification of faults and earthquake sources was a major aspect of the EIR/S process and by necessity will continue into the design and construction phase since the exact locations of structures have not yet been finalized (contingent upon preconstruction field surveys). Also, the locations of faults as shown on regional geological maps are commonly only approximate and therefore it is not prudent to expend too much effort locating them precisely until the exact locations of the transmission line structures are known. Where a fault location is critical, detailed specific studies will be conducted. Mitigation Measures G-2 through G-4 stipulate that the structures are not be placed in active fault zones, if possible. If structures must be placed in fault zones, the structures would be designed and constructed to resist fault displacement and earthquake shaking in accordance with standard industry practice and good engineering principles. Transmission lines, like the Proposed Project, have a large degree of ductility (flexibility) which can accommodate large lateral and vertical fault displacements between structures, and the structures are designed to withstand stresses imposed by other more common factors such as high winds, which are commonly stronger than the stresses caused by earthquakes.

Although earthquakes, and possibly fault displacements, may occur during the life of this project, it must be understood that large damaging earthquakes are very rare in this region. Moreover, few of the faults along the project route are active and most of them have recurrence intervals of thousands of years to more than 10,000 years between large events, making the likelihood of an event at a specific tower structure exceedingly remote. The faults near the Alturas Substation are very minor ancient features and are not believed to be active or capable of generating large earthquakes.

Furthermore, if the transmission line were to be damaged, the line would be de-energized in less than a tenth of a second (see Section C.10 of EIR/S), minimizing the potential for a significant impact on the environment or danger to people or animals. Fault displacement across dirt and gravel roads such as the road to the Alturas Substation can be quickly and easily repaired; such displacements are more of a nuisance than a real hazard to health and safety.

Further discussion of fault and earthquake hazards is presented in responses to comments GP.76-2 and GP.109-7.

SET # GP.123 JUNE ROBERTS

GP.123-1 Intensive field surveys for biological resources were conducted between May 1994 and June 1995 to identify all biological resources that might be affected by the Proposed Project. The data collected during the field surveys was then used to refine the project design (the route refinement process cited in this comment) so that some of the potential impacts to biological resources were minimized. Mitigation measures have been proposed for all significant impacts to biological resources, and detailed plans for mitigation implementation will be reviewed by and require the approval of BLM, CPUC, CDFG, USFWS, and USFS.

The purpose of the preconstruction surveys are to identify the locations of biological resources immediately prior to construction to account for any changes that might have occurred between the time the indepth field surveys were conducted and the time that construction is scheduled to begin. Based on the survey results, construction activities would be restricted to identified areas, subject to the oversight of environmental monitors.

SET # GP.124 CAROLYN KELLEY

GP.124-1 Comment noted. Please see response to comment GP.2-2.

SET# GP.125 REBECCA HAYHURST

GP.125-1 Comment noted. Please see responses to comments GP.6-1, GP.10-1, and GP.30-1.

SET # GP.126 MIKE AND CATHY BALDWIN

GP.126-1 The visual impact significance criteria presented in Section C.13.2.1.2 apply to public and private lands equally, except where noted. This section has been modified to clarify that the EIR/S does not assume that VRM indicators can be applied to private land. The visual analysis methodology used in the EIR/S has been adapted from the visual analysis methodologies of the U.S. Forest Service (USFS) and the BLM. This approach has been used effectively for both public and private lands. For public lands, both the BLM and USFS systems emphasize preservation of the visual quality of wilderness areas, primitive areas, and other special classified areas. However, for lands that do not qualify as special status categories, such as those just described, both systems emphasize visual resource preservation of areas that receive greater public visitation or exposure over areas that receive less public visitation or exposure.

However, the EIR/S does not assume that VRM indicators can be applied to private land. The first page referenced by the comment states the following: "It is important to note that even though VRM designations have been developed for all segments of the Proposed Project, VRM Class objectives do not bind public lands not administered by the BLM, or private lands."

It is also important to note that the EIR/S does not assume that remote areas have no visual significance. As stated in the second passage (Section C.13.2.1.1) referenced by the commenter: "These Key Observation Points (KOPs) were distributed along the route to evaluate impacts on visual resources with various levels of sensitivity, in different landscape types and terrain, and from various vantage points. KOPs are located: (1) along major or significant travel corridors, (2) at highway rest stops, (3) near residential areas, and (4) at existing or proposed recreation areas. Locations were selected in order to be fully representative of the typical public views to the Proposed Project and impacts that would occur along the route." Several of the KOPs located at the sites of existing or proposed recreation areas were located in remote areas accessible only by four-wheel drive roads. The referenced paragraph on Page C.13-32 does not indicate that remote areas are without visual significance. The referenced passage states that the visual impact will be adverse. It also states that the resulting visual impact is not considered significant because (at this location) few numbers of people will experience the visual impact. Also, the

views of the project (at this location) would be relatively short-term as viewers move through the area. However, as pointed out in the EIR/S (Section C.13.2.2.3 - Summary of Long-term Impacts and Mitigation Measures), even though a number of route segments were rated an overall Class III (adverse but not significant) visual impact, an individual rural residence located along that route segment could experience a Class I (significant and non-mitigable) visual impact if it has an unobscured view of project structures as prominent foreground or middle ground features in the landscape.

The Final EIR/S text in this section has been revised to include the term "middle ground". The underlying assumption is that the project (as viewed from the individual residence) will not just be visible, but will result in a high level of visual contrast.

Regarding public input, several Key Observation Points were added to the visual analysis specifically in response to comments received during the initial Project scoping meetings.

SET # GP.127 STEVE ALASTUEY

GP.127-1 A 345 kV line is a common high voltage transmission line (see Figure A.6-1 of the EIR/S). We appreciate your concerns about the electrical effects from the power line; they will be considered in the final decision. Please see response to comments GP.8-2 and GP.28-1. Section C.10.2.3.2 of the Final EIR/S discusses the compatibility of the Proposed Project with other conductive items such as pipelines.

GP.127-2 See response to comment GP.52-3 for a summary of SPPCo's existing and future system limitations. Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.127-3 See response to comment GP.30-1.

SET # GP.128 STEPHEN S. THOMAS

GP.128-1 Comment noted. Please see responses to comments GP.28-1 and GP.30-1. Section A.6 of the EIR/S discusses the economic benefits of the Proposed Project.

GP.128-2 Comment noted.

SET # GP.129 JOSHUA (LAST NAME ILLEGIBLE)

GP.129-1 Pelase see response to comment GP.52-2.

SET # GP.130 JOLENE CALDWELL

GP.130-1 Erosion related to access roads and construction of transmission line structures adjacent to sensitive plants, as well as along the remainder of the project route, is discussed in the Section C.6 of the EIR/S (Section C.6.2.2.2, under "Soils"), as well as in Section C.3.2.2.2 of Biological Resources. Mitigation Measure G-11 provides for extensive protection from erosion and for rehabilitation of disturbed plants and terrain.

Indirect impacts to sensitive plants and plant communities associated with increased access, erosion, and introduction of non-native plants have been considered in Mitigation Measures B-6, B-7, and B-8. Most new access roads and overland travel routes would be restored following construction and monitored to assess their recovery. Indirect impacts due to changes in thermal, light, and wind levels are not considered to have a substantial effect and are therefore not significant as defined by the CEQA Guidelines.

SET # GP.131 KEN AND NORMA FRANKLIN

GP.131-1 Comment noted. Please see response to comment GP.30-1.

SET # GP.132 RICK DELMAS

GP.132-1 Please see response to comment GP.30-1.

GP.132-2 Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.132-3 Table C.13-8 of the EIR/S identifies the Modoc County General Plan and Energy Element's visual resource protection policies applicable to the Proposed Project. Table C.13-9 identifies those Proposed Route segments (Segments AØ1 to CØ6 are located within Modoc County) that are inconsistent with Modoc County visual resource protection policies. The narrative discussions of each route segment within Modoc County address the consistency of the project segments with visual resource protection policies (where applicable).

GP.132-4 See Section C.13 of the EIR/S for a complete discussion of the visual impacts of the Proposed Project. Visual impairment is not expected to have an impact on tourism or migration to Modoc County. To the common tourist, the transmission line would only be visible as a prominent feature for a short period of time as the traveler crosses its path on Hwy 299 and to a limited number of viewers in remote areas. The line would also be visible as a background feature from U.S. 395.

Mitigation Measure S-1 addresses the potential depreciation in property values as a result of the Proposed Project (see Section C.11.2.1.2 of the Final EIR/S). For any parcel acquired to construct the Proposed Project, either in fee title or as an easement, the property owner would receive fair market value for the

parcel. Potential impacts on parcels near, but outside the transmission line corridor are described as significant, mitigable (**Class II**) in Section C.11.2.2.3. Mitigation Measure S-1 calls for maximizing the distance between the Proposed Project and residential parcels, when feasible.

Sections C.8.2.2.1 and C.8.2.2.2 include, respectively, discussions of the Proposed Project's construction and operations impacts on recreational uses. Also, see responses to comments GP.14-32, GP.20-6, GP.41-11, and GP.41-13.

GP.132-5 See response to comment GP.10-1.

GP.132-6 See responses to comments GP.8-2 and GP.120-1.

GP.132-7 As described in revised Part F of the Final EIR/S, a comprehensive and independent Mitigation Monitoring, Compliance, and Reporting Plan similar to that requested by the commenter, would be implemented if the project were to be approved.

SET # GP.133 SYDNEY SMITH

GP.133-1 Please see responses to comments GP.41-11, GP.41-12, and GP.126-1.

SET # GP.134 PEGGY LEAR BOWEN

GP.134-1 Section C.8.2.4 has been revised in the Final EIR/S to include cumulative impacts as a result of the Evans Creek Watershed Dam project. Also, a new Mitigation Measure L-15 has been included to reduce impacts to a level of non-significance.

GP.134-2 The Proposed Project and existing 345 kV transmission line accessing the North Valley Road Substation would travel a parallel path for a distance of approximately 2000 feet (see Base Map 33 at the end of Volume I of the Final EIR/S). As discussed in Section B.3.4.6.2, the transmission alternatives identified would need to travel parallel to the Tracy-North Valley Substation 345 kV and 120 kV lines for a distance of approximately 15 miles. In addition, termination at the North Valley Substation would still be required (see Sections A.6.2.3 and A.6.5). Therefore, the Proposed Project alignment reduces the potential for a simultaneous failure. See response to comment GP.52-3 for a summary of SPPCo's existing and projected system limitations.

SET # GP.135 R. MARK ARMSTRONG (EARTH ENGINEERS)

GP.135-1 Comment noted. Aspen Environmental Group was selected by the CPUC and BLM (Lead Agencies) for this work at the outcome of a competitive bidding process on the basis of its proposal for the work. Aspen has executed, and is continuing to execute, its proposal and contract scope of work for the preparation of this EIR/S (including its revision and finalization at the present time) in a satisfactory manner at the direction of the Lead Agencies.

GP.135-2 Section A.6.9.1 has been expanded in the Final EIR/S to provide an update on the current System Operation Review of the Columbia River system and how it would affect SPPCo's access to the Pacific Northwest power market. Section E.3.3 discusses the growth-inducement potential of the Proposed Project. As discussed in Section E.3.3, the limitations on growth in the Reno region is limited to the unincorporated North Valleys area only. Growth in other areas is projected by the local governments to exceed 300 percent in some areas over the next 20 years (see Section B.3.4.6.2 of the Final EIR/S).

GP.135-3 Biological resources were analyzed to assess the magnitude of impacts associated with the proposed transmission line. This analysis was in keeping with state and federal requirements and included consideration of the extent and duration of impacts. The documented analysis includes acknowledgment of the complexity of the ecological systems associated with the Proposed Project.

GP.135-4 The point about studying geological provinces is not clear. Geological provinces are nothing more than the geoscientist's attempt to simplify and categorize areas according to average or characteristic regional geological conditions. These province characteristics may be important because they indicate conditions that may occur in proximity to the specific project corridor. Section C.6.1.1 of the EIR/S discusses geological and hydrological provinces of the region adequately to characterize the region's geological and hydrological conditions. These discussions are basically a means to "set the stage" as to what the general or average geologic and hydrologic conditions along the route are likely to be. However, in the actual impact analysis it is the specific conditions within the route corridor that are important with respect to the environmental impacts, not the average regional conditions. Specific adverse conditions and probable conditions are identified in the EIR/S, and mitigations appropriate for the level of detail of an EIR/S are proposed for these conditions.

GP.135-5 Section C.8.1.4 of the EIR/S describes the federal, state, and local plans, regulations, provisions, and policies applicable to the Proposed Project. Section C.8.2.3 addresses the consistency of the Proposed Project with these plans, regulations, provisions, and policies. The pertinent federal, state, and local decision makers will make final determinations on the Proposed Project's compliance with their respective plans and policies.

Section C.9 of the EIR/S addresses the noise impacts of the proposed and alternative routes.

GP.135-6 In addition to electromagnetic field impacts of the Proposed Project, Section C.10 of the EIR/S Public Health & Safety, also addresses corona effects, visible light, radio and television interference, induced currents, shock hazards on joint-use corridors, the potential effects on cardiac pacemakers, lightning, effects on crops and livestock, fuel ignition, fire hazard, and hazardous materials.

GP.135-7 Socioeconomic and public service impacts were evaluated in Section C.11 of the Final EIR/S. Section C.11.2.2.4, under "Fiscal Impacts," discusses the potential beneficial socioeconomic impacts of the Proposed Project to local communities.

GP.135-8 Section C.13 of the EIR/S Visual Resources, discusses the Proposed Project's potential visual impact to the City of Alturas and nearby areas. This information is presented in the discussions of Proposed Route Segment A in Sections C.13.1.3.1, C.13.2.2.2, and C.13.2.2.4. Please see also the photosimulations prepared for the Proposed Project in the Alturas area (Figures C.13-1B, C.13-2B, C.13-2D, C.13-3B, and C.13-4B). See also response to comment GP.41-7.

Sensitive land uses that could be affected were listed in Table C.8-1, and properties subject to a significant, unavoidable adverse impact (Class I) were also indicated. There are expected to be few cases where residents would see a measurable loss of property value. See response to comment GP.132-4.

GP.135-9 See response to comment GP.30-1 for a discussion of alternative routes considered. Response to comment GP.10-1 discusses undergrounding the Alturas Transmission Line. As discussed in Sections B.2.3.2, C.3, and C.7, stream crossings will be spanned; during construction SPPCo may utilize either helicopters or manual stringing. The Likely Fault could be spanned. The benefits of the project will go to the entire SPPCo service area (estimated population 750,000) since it will enhance overall system performance and reliability (see Part A of the EIR/S): this service area includes approximately 40,000 California residents. Response to comment GP.6-1 (second paragraph) discusses the decision making process for the Proposed Project.

GP.135-10 There are no known populations of osprey in the vicinity of the Proposed Project. CDFG Biologist Doug Thayer indicates that osprey have been known to nest in the Canby area 15 miles west of the proposed transmission line. There were no observations of osprey in the vicinity of the Proposed Project during surveys in 1994 and 1995.

The Proposed Project would span all open water fish habitat which occurs in the ROW. In addition, during construction all activities in the vicinity of this habitat type are strictly regulated by the CDFG under the 1600 Streambed Alteration Agreement. For example, a 200-foot buffer would be observed at all stream crossings. Vehicle parking, maintenance, and overland travel would be prohibited in these areas. There would be no impacts to fisheries or fish habitat as a result of construction or operation of this project.

GP.135-11 The Madeline Plains were considered in the EIR/S as habitat for waterfowl and shorebirds during migration. This use of the habitat was the primary consideration behind the assertion that the Madeline Plains alternatives would be more detrimental to wildlife species than the Proposed Segment E which skirts the juniper habitats on the eastern edge of the region. In addition, the seasonally inundated basins in the vicinity of Ravendale and Termo were described as potential habitat for waterfowl during very rainy years when these area contain standing water. Mitigation Measure B-20 requires bird flight diverters in this region.

Special status plants in the Madeline Plains were identified and mapped. Potential impacts to these species are discussed in Section C.3.2.2.2 of the EIR/S. Avoidance zones have been created to protect special status plants during the construction process and biological monitors are required to document compliance with mitigation measures. Please see Mitigation Measures B-3 and B-5.

No changes to the existing topography of the Madeline Plains would occur as a result of the project construction since impacts would be limited to overland travel and erection of structures for the transmission line. Most of the overland travel in this portion of the route would be confined to the Tuscarora Pipeline ROW.

No special status fairy shrimp species are known to occur in the Madeline Plains. Dr. Denton Belk who has collected fairy shrimp and other aquatic invertebrate species throughout the western United States stated that none of the special status fairy shrimp species would be expected to occur in the project area.

GP.135-12 There would be no impacts to stream channels or their banks during construction of the Proposed Project. A 200-foot buffer zone has been established in Mitigation Measure B-6.

GP.135-13 See response to comment GP.41-24 with regard to initial Native American contact related to the project. Native American consultation is an on-going process that is being conducted by the BLM pursuant to their guidelines for Native American consultation guidelines set forth in BLM Manual 8160 and Handbook H-8160-1. Subsequent site-specific mitigation requiring an Archaeological Resources Protection Act permit will have an automatic review by representatives of the Native American community. The Infernal Caverns is acknowledged as significant. See response to comment OC.2-1.

GP.135-14 The zone of analysis for the cultural resources study was a 660-foot-wide area of potential effect (APE) as defined at the outset of the project. Since any resource can be considered for inclusion on the National Register of Historic Places, it is not reasonable to undertake an evaluation of potential project related effects to virtually every manmade element on the landscape. Accordingly a 660-foot APE was developed to provide a meaningful context for evaluating cultural resources. In its most recent draft of the Programmatic Agreement following preparation of the Draft EIR/S, the BLM has identified an additional APE for other historic properties, identified by members of the public, within two miles of the Proposed Project. In the Section 106 compliance process of the National Historic Preservation Act of 1966, the term "historic property" means sites listed or formally determined to be eligible to the National Register of Historic Places (NRHP). The Niles Hotel is more than one mile from the Proposed Project and according to the files of the Northeast Information Center of the California Archaeological Inventory and the California State Historic Preservation Office, the hotel is not listed, nor has it been formally determined to be eligible to the NRHP.

GP.135-15 Campgrounds are not normally considered cultural resources as defined in the EIR/S. Development at these campgrounds would be under the purview of the agency responsible for the individual campground. Cultural resource studies for activities that might have the potential to affect cultural resources that are known or potentially occur at any one of these facilities would be guided by the specific cultural resources requirements of the agency. Blue Lake, Patterson, Mill Creek Falls, Soup Springs, Lower Roberts Reservoir, Dorris Reservoir, and Big Sage Reservoir campgrounds are all located more than two miles from the Proposed Project.

The economic impact of constructing and operating the Proposed Project on campgrounds in the affected counties is not considered to be significant.

GP.135-16 We acknowledge that the proposed alignment crosses the location of the Lassen Trail near State Route 299. The Applegate Trail is located to the north of the project where it crosses Goose Lake. Users who wish to experience hiking the Lassen Trail system would only experience short-term visual affects while hiking the trail near the proposed powerline. In fact a driving guide for the trail is provided by Immigrant Trails West, published in 1984 by Devere Helfrich, Helen Helfrich and Thomas Hunt. The location of the trail currently intersects, or is adjacent to, other modern features on the landscape, e.g. State Highway 299.

According to the files of the Northeast Information Center of the California Archaeological Inventory and the California State Historic Preservation Office the Dorris Bridge is not listed, nor has it been formally determined to be eligible to the NRHP and thus not subject to further evaluation in the EIR/S. According to Claude Singleton of the BLM, the original Dorris Bridge has been replaced with a more modern structure (Claude Singleton: personal communication).

According to the files of the Northeast Information Center of the California Archaeological Inventory and the California State Historic Preservation Office, the grave of Lt. John Madigan is not listed, nor has it been formally determined to be eligible to the NRHP, and thus not subject to further evaluation in the EIR/S. The location of the commemorative marker is adjacent to a modern county road. According to newspaper accounts provided by the Northeast Information Center of the California Archaeological Inventory, the exact location of the actual gravesite is unknown. A commemorative marker is not considered a cultural resource and would not be affected by the presence of a powerline.

According to the files of the Northeast Information Center of the California Archaeological Inventory and the California State Historic Preservation Office, the only camp listed of a fur brigade of the Hudson Bay Company under the command of John Work is the "Sevenmile Site" listed in the National Register of Historic Places and is located approximately 15 miles to the west of the Proposed Project.

The Nevada-California--Oregon Railroad office is on the NRHP and is located in Alturas. It is located approximately 0.8 mile from the terminus of Alternative Segment B. Proposed Segment A has been recommended as the environmentally superior alternative, a selection which is further buttressed by the presence of the NCO office within 0.8 mile of Alternative Segment B.

According to the files of the Northeast Information Center of the California Archaeological Inventory and the California State Historic Preservation Office, the Nevada-California-Oregon railroad grade is not listed, nor has it been formally determined to be eligible to the NRHP. The Proposed Project only crosses portions of the NCO railroad which have been incorporated into the existing Southern Pacific railroad, currently in use.

See responses to comments OC.2-1, GP.41-23, and TA.6-3 regarding Infernal Caverns.

GP.135-17 The comment on recreational activities in Modoc County is noted. Sections C.8.1.2 and C.8.3.1 of the EIR\S describe the recreational uses in the area of the proposed and alternative routes in Modoc County. See responses to comments GP.20-6, GP.41-11, and GP.41-13.

GP.135-18 See response to comment GP.132-3.

GP.135-19 While portions of the Proposed Project would be visible from certain locations within the City of Alturas, and while some skylining would be perceived, most route segments would appear as distant features in the background landscape. See also responses to comments GP.132-4 and GP.135-8.

GP.135-20 See response to comment GP.135-5 regarding consistency of the Proposed Project with federal, state, and local policies. See Sections C.4, C.8, and C.11 of the EIR/S for analyses of the impacts of the Proposed Project on cultural resources, land use, and socioeconomics, respectively. Impacts of the Proposed Project on tourism in the affected counties are not considered to be potentially significant.

GP.135-21 As part of their application to the California Public Utilities Commission, SPPCo was required to submit a "Proponents Environmental Assessment" (PEA). The PEA discusses geological resources and is available for public review at the document repositories.

GP.135-22 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications. Response to comment GP.30-1 discusses alternatives, including the joint use of existing utility right-of-ways in Nevada. The maintenance cost of the Proposed Project is not expected to be any higher than alternative routes in Nevada since both regions offer severe weather conditions. In addition, the Proposed Project is a minimum of 65 miles shorter than alterative routes in Nevada, thereby minimizing total maintenance costs.

GP.135-23 The Uniform Building Code (UBC) presents very general standards of practice, primarily to cover smaller projects where there are no other guidelines to regulate them, or where local regulations are minimal or non-existing. There is no attempt to circumvent or be exempt from the excavation and grading provisions of Chapter 70. In fact, the guidelines and stipulations controlling grading presented in the EIR/S and in the mitigation measures far exceed the relatively loose provisions of the UBC. The combined management of the federal, state, and local regulatory agencies (for example, BLM, CPUC, CDFG, USFWS, CEC, as well as others) provide much more control over grading and more stringent regulation than the UBC. Furthermore, the UBC is designed to cover a broad spectra of areas and project types, whereas the analyses and mitigations resulting from the EIR/S and the mitigation measures require detailed and specific plans, such as the Soil Conservation and Erosion Control Plan, Streambed Alteration Agreements, Part 404 Permitting, Storm Water Pollution Prevention Plan, etc. In contrast to the UBC, these plans are specifically designed for this particular project in this specific area. These plans and guidelines will provide for the least impacts.

GP.135-24 The EIR/S specifically documents ten perennial stream crossings, seven flood plains (Section C.7.1.2.1), and 23 wetlands and non-wetland waters (see responses to comment PA.23-34). Most streams crossed by the Proposed Project are intermittent streams (i.e., dry washes that contain water only during periods of precipitation. There are two types of these intermittent streams: those which

regularly carry water (but for short times during times of precipitation), and those that are nothing more than swales or linear dips in topography. The latter type especially can go years without containing any channelized running water. It is not likely that any project activities would affect intermittent streams and structures would not be placed within them. As a result, the project would not have any significant impact on them. The impacts analysis presented in the EIR/S (Section C.7.2.2.1) concentrates on the important features (Class II impacts) such as perennial streams, wetlands, and 100-year flood plains. Mitigation Measures H-1 through H-4 would reduce these impacts to a level of non-significance (see also response to comment GP.135-28).

The various financial assessments presented in this comment are not within the scope of the EIR/S. The EIR/S was prepared under the auspices of the BLM and CPUC, not the Applicant. Economic and financial considerations of the Applicant did not enter into or influence the geological and hydrological assessments.

GP.135-25 As suggested by this comment and as shown on Map 6 of 33 at the end of Volume I of the EIR/S, the proposed transmission line corridor is in close proximity to the Likely fault. However, the precise location of the footings of the structures has not been finalized and it may be possible to place the structures within the designated corridor without putting them directly on or astride the fault. Mitigation Measures G-2 through G-6 would insure that any impacts from improbable surface rupture or earthquakes on the fault are minimized. However, it should be emphasized that the Likely fault is not an active fault and has not been designated an Earthquake Fault Zone by the California Division of Mines and Geology (CDMG). Any maps or designations by C.F. Richter are extremely out of date and unreliable. Table C.6-3 and the associated EIR/S text discusses the ages of faults important to the project with references to the appropriate sources of the data such as the CDMG (Jennings, 1992) and the U.S. Geological Survey (Dohrenwend et al. 1993). These agencies do not consider the fault to be active. A new map and compilation of fault ages by the CDMG (Jennings, 1994) released since the Draft EIR/S was printed supports the EIR/S and likewise indicates that the Likely fault is not active.

As discussed in various other responses (e.g., GP.76-2, GP.109-7, GP.122-2) and in the EIR/S (Section C.6.1.3.1), most of the Quaternary faults in the region have recurrence intervals of thousands of years to several tens of thousands of years, not 20 years as suggested by this comment. Even the most active of faults in California such as the San Andreas fault have average recurrence intervals more than about 150 years. The probability that an inactive fault such as the Likely fault could generate a large-magnitude destructive earthquake during the life of the project is exceedingly remote.

GP.135-26 This comment poses numerous questions most of which are based on the incorrect assumption that the Likely fault is active. It should be noted that there are no federal, state, or local laws, regulations, or guidelines that require non-active faults be avoided. However, Mitigation Measures G-2 through G-6 are designed to minimize any adverse impacts of faulting or earthquakes to levels of insignificance and, therefore, most of the questions are not applicable.

Also, the comment seems to confuse maximum probable earthquakes and maximum credible earthquakes. To estimate the maximum probable earthquake for a fault, the time period of interest must be designated

(i.e., a maximum probable earthquake is the largest earthquake expected in say a 100-year, a 250-year, or some other designated time period). Once these numbers are specified, the probabilities of earthquakes can be calculated. The dip and amount of slip do not enter into any equation for determining a maximum probable earthquake. The maximum credible earthquake would be the largest event to occur considering the presently known seismotectonic framework. Empirical data indicate that this would be about 7.25 (Table C.6-3) not 7.5.

Standard practice is to assume that future ruptures would occur on the most recent previous surface rupture. It would be difficult to predict exactly where any future surface ruptures might occur because the Likely fault is not known to have been active within the past 10,000 years.

As discussed in response to comment GP.135-25, it may be possible to locate structures in proximity to the Likely fault without actually straddling the fault and therefore the questions about amounts of slip are not relevant.

Referring to the questions about whether it is possible to design a structure to withstand a magnitude 7.5 earthquake, the answer is yes. However, it should be understood that there is more to seismic design than simply the maximum earthquake magnitude. As discussed in responses to comments GP.76-2, GP.109-7, GP.122-2, transmission lines are very ductile systems which are designed to withstand strong winds. The strong winds that frequently blow in this region may subject the structures to stresses in excess of those that would be caused by a large earthquake and therefore the structures are not likely to collapse during an earthquake.

GP.135-27 There are many fractures and discontinuities in the rocks of the Devils Garden Plateau upon which the Alturas Substation is proposed. The lack of surface expression of these features indicates that they are not faults, or that if they are faults they are very old (i.e., older than the rocks on the surface which are older than Quaternary age). As such, these features are not capable of generating large-magnitude earthquakes or surface ruptures.

Even if these features were active faults, the fact that such faults dip under the proposed facilities is not important. Faults in the region generally dip steeply. Projection of a steeply dipping fault would place the fault hundreds to thousands of feet below the substation. The stresses induced by the weight of the structures or the substation facilities would dissipate within tens or a few hundreds of feet to a level of insignificance. Large damaging earthquakes in the region generally occur on normal faults at depths on the order of 5 to 10 miles deep where stresses are extremely high. The small surficial stresses from the weight of the facilities could not affect a fault at great depth so as to induce earthquakes or fault slippage. Furthermore, the stresses induced by surface facilities would be normal stresses which would tend to increase coupling and confining pressure across the fault plane, thereby making it more unlikely to induce earthquakes.

GP.135-28 Section 404 of the Clean Water Act regulates the placement of fill in jurisdictional wetlands and waters. The revised text of Mitigation Measure B-6 in the Final EIR/S stipulates that "the Applicant shall not drive across or operate vehicles of any kind off of existing roads within 200 feet of

stream channels with adjacent or in-channel wetlands as defined by the criteria of the USACE 1987 Wetland Delineation Manual. This mitigation measure specifically applies to the stream channels that are listed in Table C.3-5 of the Final EIR/S.

Other stream crossings listed in this comment are characterized by intermittent flows. Crossings of intermittent streams lacking adjacent or in-channel wetlands are not considered in the EIR/S for the following reasons:

- Construction is scheduled to occur during the dry season and will not require the construction of "engineered" crossings (Part B of the EIR/S)
- No transmission line structures will be placed within stream channels (Part B of the EIR/S)
- No culverts or fill will be placed in stream channels
- Mitigation Measure B-6 specifies that no bladed overland travel routes shall be constructed across stream channels with "bed and bank."

GP.135-29 As discussed in Sections B.2.3.2, C.3, and C.7, stream crossings would be spanned. Access to the Proposed Project right-of-way during maintenance activities would be restricted to the access routes presented in Table B-3, Construction Access Routes, of the EIR/S. None of the proposed access routes cross any stream or creek beds.

GP.135-30 Botanical surveys of the Proposed Project study area did not identify any populations of the special status species listed in this comment, although they have been known to occur in the general vicinity of the Proposed Project (see Table C.3-3 of the EIR/S). Surveys were timed to coincide with the optimal time periods for identification of these plant species. No impacts to special status plant species are anticipated at any of the stream crossings in the project study area.

GP.135-31 Wildlife surveys of the Proposed Project study area did not identify any of the fish species listed in this comment, although these species have been known to occur in the general vicinity of the Proposed Project (see revised Table C.3-4 of the Final EIR/S). It was also found that the habitat for the species indicated would not be impacted. Please see Mitigation Measure B-15, which includes restrictions for vehicular travel and lists other activities which are restricted in the riparian areas in the vicinity of the Proposed Project.

GP.135-32 None of the habitat for these species would be impacted. The Great Basin spadefoot toad, *Scaphiopus intermontanus,* is not a species of special concern and has been removed from Table C.3-4 in the Final EIR/S. The other species mentioned here were not found in the study area of the Proposed Project, although they have been known to occur in the general vicinity (see Table C.3-4 of the EIR/S).

GP.135-33 Field surveys of the entire project study area identified all of the stream crossings with significant biological resources or that constitute regulated waters of the United State. Potential biological impacts to regulated waters and wetlands have been summarized and addressed in Section C.2.2.2.3 of the EIR/S. Implementation of Mitigation Measure B-15, which restricts crossing of riparian and perennial streams, would reduce these potential impacts to a level of non-significance.

GP.135-34 Some portions of the Madeline Plains and Mud Flat may be jurisdictional wetlands and have been identified as such in the Final EIR/S text and maps. However, the presence of water on the Madeline Plains does not necessarily qualify them as a wetlands. To be a wetlands, according to U.S. Army Corps of Engineers (USACE) guidelines, an area must have hydrophytic plants, hydric soils, and must be flooded during the growing season of the prevalent vegetation. In the case of dry lakes within the Basin and Range province, hydric soils are commonly relict soils formed during the wetter Pleistocene ice ages thousands of years ago. Presently many of these dry lakes may go several years without being flooded during the growing season and thus would be classified hydrologic zones V and VI which are only irregularly or intermittently inundated or saturated (Table 5 of the USACE Wetlands Delineation Manual, 1987). Such areas are not considered jurisdictional wetlands.

Please refer to revised Section C.3.1.2.1 in the Final EIR/S for a summary of all of the jurisdictional wetlands in the project corridor.

GP.135-35 See response to comment GP.41-10 for a discussion of alternatives in the Alturas area. Responses to comments GP.1-3 and GP.14-11 address alternatives utilizing existing utility corridors. Response to comment GP.10-1 discusses transmission line burial.

See responses to comments GP.135-8 and GP.135-19 for a discussion of visual resources.

GP.135-36 See response to comment GP.132-3. The Proposed Project is an electric transmission line, not a chairlift structure for a ski resort. Chairlifts would be inappropriate due to public safety factors. See response to comment GP.135-5 regarding consistency of the Proposed Project with federal, state, and local policies.

GP.135-37 See Sections A.6.8.2 and B.3.4. 3 for a complete discussion of generation alternatives, including the new Piñon Pine Power Plant.

GP.135-38 See responses to comments GP.1-3 and GP.30-1 for a complete discussion of utilizing existing utility right-of-ways in Nevada as a joint utility corridor for the Proposed Project. Response to comment GP.41-18 discusses utility corridor impacts in Modoc County.

See responses to comment set PA.16 regarding the Modoc County Supervisors' Resolution.

GP.135-39 Corona noise has a steady "humming" character that would not be irritating unless heard at a very close distance. There is no known psychological health effect from transmission line noise. Please refer to the discussion of corona noise in response to comment GP.76-4.

GP.135-40 Numerous alternatives in addition to Proposed Segment A and Alternative Segment B from north and west of Alturas have been considered. For example, the EIR/S considered the Nevada Alternative which extends eastward from Alturas to the LADWP corridor in northwest Nevada as well as numerous other transmission alternatives (see Section B.3.4.6) and the U.S. Forest Service (USFS) Alturas Alignment (see Section B.3.4.1).. Further consideration has been given to the Nevada Route

Alternative and the USFS Alturas Alignment in the Final EIR/S. In conclusion, a full range of reasonable alternatives to the Proposed Segment A has been considered. Relative wealth of different areas was not a factor in the comparative analysis of alternatives for this EIR/S. However, further consideration of potential disproportionate impacts of the project and alternatives on low-income and minority communities has been given and is documented in the new Section C.14 in the Final EIR/S.

GP.135-41 There may be sales (short-term) and property tax benefits (long-term) to Alturas. As discussed in Section C.11.2.2.4, the tax revenues generated from the Proposed Project would result in a beneficial impact to Modoc County.

GP.135-42 As discussed in Sections A.6.4 and A.6.5, the Alturas Transmission Line enhances the performance of SPPCo's electric power system by improving service reliability and increasing import capacity; the entire system benefits, not just the area around the termination point of the Alturas Transmission Line. The extent that the system enhancement offered by the Proposed Project can satisfy future growth is dependent upon the rate, type, and area of growth.

GP.135-43 Key Observation Points were established based on consultations with the U.S. Forest Service and U.S. Bureau of Land Management, Modoc County Planning Department, and comments received from public scoping meetings prior to initiation of the visual analysis.

Adding a chairlift to a transmission line would not diminish a structure's prominence in the landscape.

See also responses to comments GP.20-4, GP.23-6, GP.41-7 (second paragraph), GP.132-3, GP.135-8, and GP.135-19.

SET # GP.136 VICKI L. HUGHES

GP.136-1 To prevent impacts associated with increased access, access route Segment A2 (described in Appendix E.5) would be returned to pre-improvement conditions unless BLM, CPUC, CDFG, and/or USFWS determine that it is not feasible or desirable. Impacts due to the permanent access route are mitigated through offsite compensation. Existing barriers to overland travel shall be replaced following construction and additional barriers shall be placed at key access points to the non-bladed overland travel routes. The success of this mitigation shall be monitored following construction and additional measures shall be implemented if necessary.

SET # GP.137 MICHAEL E. DUNN

GP.137-1 Please see response to comment GP.135-16. The proposed transmission line crosses the Lassen Trail near State Route 299. The Lassen Trail south of the Pit River is located west of Proposed Segment A, according to information provided in Immigrant Trails West, published in 1984 by Devere Helfrich, Helen Helfrich, and Thomas Hunt.

SET # GP.138 GARY AND JUNEE FEERO

GP.138-1 Please see response to comment GP.25-1.

GP.138-2 Homes in the Horizon Hills area are at least 2,500 feet away from the Proposed Project (see Base Maps at the end of Volume I). As discussed in Section C.13 of the EIR/S, from a distance of several thousand feet, the Proposed Project would be a distance, background feature. The Proposed Project's visual prominence would be determined by the nature of the terrain (relief, color, and complexity) and the proximity of the viewer to the Project. See response to comments GP.2-2 and GP.56-1 for a discussion of the project impacts on property values.

GP.138-3 Detailed information on the recreational and aesthetic resources of Peavine Peak and the policies of Washoe County and the Cities of Reno and Sparks on preservation of the natural resources of Peavine Peak have been added to the Land Use setting (see Section C.8.1 of Final EIR/S). In addition, Peavine Peak has been added to the list of recreational areas that would be significantly impacted by the Proposed Project.

See the revised Policy Consistency Analysis, Section C.8.2.3.3, for an analysis of the consistency of the Proposed Project with the plans and policies of Toiyabe National Forest, Washoe County and the City of Reno.

GP.138-4 Section E.3.3, Potential Growth-Inducing Effects, has been expanded in the Final EIR/S to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.138-5 Section A.6 of the EIR/S discusses the economic benefits of the Proposed Project. To what extent SPPCo passes on the economic benefits to the consumer is beyond the scope of this EIR/S which is to assess the environmental impacts of construction and operating the project. Section B.2.2.1 presents that land ownership along the Proposed Project route consists of approximately 44% private land and 56% public land. Section A.6.2.2 of the EIR/S and response to comment GP.14-35 presents to what extent SPPCo currently utilizes geothermal resources (non-utility generation) and their projections for the future. SPPCo's 1993 Electric Resource Plan further elaborates on the use of geothermal resources and is available at the document repositories.

GP.138-6 Comment noted. See response to comment GP.138-2. At distances of two miles and greater, a transmission line structure of the size proposed can appear relatively unnoticeable as a subordinate distant background feature in the landscape (if skylining does not occur), as demonstrated in photosimulations of the Proposed Project at five-mile and two-mile distances (Figures C.13-8D, and C.13-8E respectively).

SET # GP.139 ERIC ROVE

GP.139-1 Comment noted. Please see responses to comments GP.28-1 and GP.52-3.

SET # GP.140 KARL BLAHM

GP.140-1 Comment noted. Please see response to comment GP.28-1.

GP.140-2 See response to comment GP.52-3. Section A.6.2.3 of the Final EIR/S has been revised to include a discussion of future wheeling demands.

GP.140-3 Comment noted.

SET # GP.141 JOHN WILLIAMS

GP.141-1 The cumulative impacts of the proposed Alturas Transmission Line Project and the Tuscarora Pipeline Project have been comprehensively addressed in this EIR/S. In addition, much environmental information was made available from the earlier studies conducted for the Tuscarora project, benefitting the analysis for the Alturas project. However, it should be kept in mind that these are two very separate and discrete projects with different characteristics and impacts, different permit requirements, and with largely different locations (they are only adjacent to each other for approximately 37 miles - about 22% of the length of the Alturas project and about 15% of the length of the Tuscarora project).

GP.141-2 Wildlife habitat which would be lost or disturbed as a result of the Proposed Project is documented in the EIR/S and will be mitigated through acquisition of habitat and through restoration. All aquatic habitat in the Proposed Project area would be spanned by the proposed transmission line. Activities in the vicinity of aquatic habitat or wetland habitat would be restricted. These areas would be carefully monitored before and after construction by environmental monitors under constract with the Lead Agencies. Restrictions would be applied to construction timing and construction activities including speed limits, litter removal, absence of firearms and dogs, in order to protect wildlife in the project area, including big game.

GP.141-3 The Applicant is responsible for acquiring the necessary amount of offsite habitat to mitigate for plant and animal habitat loss in the project area. The mitigation ratio of approximately 3 to 1 replacement was applied to habitat loss. Please see Section C.3.2.2.1 for a discussion of offsite compensation for losses of habitat. Monitoring will be required to determine the effectiveness of offsite compensation habitat. In the case of failed restoration efforts, the Applicant would be responsible for acquiring additional habitat. The Honey Lake area hog farm which is referenced in this comment is considered in the cumulative impacts section of the EIR/S.

GP.141-4 Specific plans for restoration of affected biological resources will be described in the Community Habitat and Restoration Plan under preparation by the Applicant (see response to comment PA.23-1 regarding preparation of the Plan.) Temporary and permanent impacts to biological resources would also be mitigated by offsite compensation.

GP.141-5 Habitat acquisition to provide offsite compensation, described in Section C.3.2.2.1 of the Final EIR/S, requires the Applicant to provide a per-acre endowment fee to the appropriate regulatory agency, from which maintenance costs and taxes will be paid.

GP.141-6 Significant adverse impacts to wetlands are addressed in the EIR/S. Mitigation is proposed for all significant adverse impacts to biological resources. Temporary impacts to wetlands would be mitigated by restoration of the affected area. Overland travel in wetlands has been minimized to reduce temporary impacts to jurisdictional wetlands. No uniquely sensitive or rare jurisdictional wetland habitat types, such as vernal pools, would be affected by the Proposed Project. If restoration does not meet the predetermined success criteria specified in the Community Habitat and Restoration Plan, alternative contingency measures would be implemented.

GP.141-7 The Proposed Project study area does not contain any vernal pool habitats. Therefore, no impacts to special status plant species associated with these habitats are anticipated.

GP.141-8 Please refer to the responses to comments GP.141-6 and GP.141-7.

GP.141-9 All potential jurisdictional wetlands in the project study corridor were documented during field surveys conducted in 1994. Mitigation was proposed for all significant impacts to biological resources, including jurisdictional wetland types. A 200-foot buffer zone would be used at all stream crossings and wetland sites in the project corridor. This buffer zone width is adequate to significantly reduce inadvertent and indirect impacts to streams and wetlands.

GP.141-10 The Applicant has stated that they have no plans to apply herbicides in the project area during construction or maintenance. This practice will be confirmed by on-site environmental monitors.

GP.141-11 Preliminary estimates of the area of offsite compensation required as mitigation for permanent and temporary loss of wetland habitats is summarized in Table C.3-11 of the Final EIR/S. These estimates require a 3:1 replacement ratio; however, final values will be determined in consultation with the resource agencies upon assessment of the "as-built" impacts after construction is completed.

The Proposed Project study area does not contain any vernal pool habitats.

GP.141-12 As cited in Section C.11 of the EIR/S, because project construction involves short-term work for any specific trade in a specific location, it is not expected that out-of-town workers would bring their families, a pattern which is more typical of projects that involve six months or more work in a single location.

GP.141-13 See response to comment GP.141-12.

GP.141-14 The Proposed Project parallels the Tuscarora Pipeline Project for only about 37 miles. Using the equations cited by the commenter, approximately 2.4 incidents could be anticipated over a 50-year period. (An incident would involve a release of gas, and under certain circumstances, the ignition

of released gas, and could occur if ignition sources are within immediate proximity of released gas and the gas/air dilution factor at the source of ignition). While it is unlikely that an explosion could occur in the vicinity of a transmission line structure, given the average separation distance of at least several hundred feet horizontal and an average a hundred feet vertical, there would be adequate separation to prevent damage to the structure or conductors. If, however, the structure or conductors were damaged, high-speed relay equipment would de-energize the transmission line in approximately one-tenth of a second, as described in Section C.10.2.3.3 of the EIR/S. In the unlikely case of damage to the line or in the case of de-energizing the line, the transmission line would be temporarily out of service.

For a discussion of induced current in joint-use corridors, see Section C.10.2.3.2 of the EIR/S, and Section C.10.2.4 for a discussion of the Tuscarora Pipeline Project.

GP.141-15 Williamson Act withdrawals would not be required as a result of the Proposed Project crossing agricultural preserve lands.

GP.141-16 Impacts to biological resources as a result of construction of permanent access roads are addressed in Appendix E.5. Loss of deer and antelope habitat, rare plant impacts, and other impacts to biological resources are addressed in Section C.3.1.1.2 in the Final EIR/S.

GP.141-17 As described in Section C.2.2.3.2 of the Final EIR/S, the construction emissions generated along the Proposed Alturas Transmission Line would fall substantially below the general conformity "de minimus" emission thresholds (40 CFR 6, 51 and 93). As a result, the project is in conformity with the State Implementation Plans (SIP) of California and Nevada. Therefore, a separate public comment period will not be required.

GP.141-18 Provisions for controlling dust during the construction of the proposed Alturas Transmission Line will be identified in the Applicants's Dust Control Plan. These provisions are subject to the approval of the California Public Utilities Commission (CPUC), the Bureau of Land Management (BLM), and the local Air Pollution Control Districts (APCDs).

SET # GP.142 NICK AND VIRGINIA CHORAK

GP.142-1 Please see response to comment GP.2-2.

GP.142-2 Sections C.3.2.2.2 and C.3.2.2.3 describe impacts to vegetation and wildlife as a result of the Proposed Project. Impacts to these resources will be mitigated to levels that are not significant. Please see Appendix E.8 of this document for a discussion of impacts to waterfowl as a result of the project, and Appendix E.9 for impacts to raptors. Also, see Table C.3-19 for a summary of mitigation measures that will be implemented and monitored for five years in order to ensure that mitigation measures are effective.

SET # GP.143 NANCY A. FINLEY

GP.143-1 Please see response to comment GP.6-1 for a summary of project impacts. Response to comment GP.8-2 (second paragraph) discusses electric and magnetic field impacts. As discussed in Section C.10.2.3.3, the risk of fire from a broken, energized conductor coming in contact with combustible materials on the ground is extremely low. Standard high-voltage transmission line design incorporates high-speed relay equipment that de-energize the line upon breakage in approximately one-tenth of a second.

GP.143-2 Impacts of the Proposed Project on residential land uses are addressed in Section C.8.2 of the EIR/S. It is true that the proposed transmission line, once built, would be in place for decades.

GP.143-3 The East Secret Valley Alignment (ESVA) is assessed as an alternative to Proposed Segment L in this EIR/S. As discussed in Part D, because of the extensive biological and cultural resources along the ESVA, Proposed Segment L has been deemed preferable. Further consideration of the comparative analysis of this alternative with the proposed route has been given and is presented in revisions to Part D of the Final EIR/S. The results of additional biological resource surveys for this alternative are provided in Appendix E.6 in the Final EIR/S.

SET # GP.144 FRANK E. BRAZE

GP.144-1 The EIR/S process for the Alturas Transmission Line has been independently conducted by the Lead Agencies without influence from the Tuscarora Gas Pipeline Company, or for that matter, from Sierra Pacific Power Company. The Lead Agencies have been assisted by Aspen Environmental Group, an independent third-party contractor, which is bound by stringent contractual provisions protecting against conflict of interest with respect to the Applicant (Sierra Pacific) and any of its subsidiaries, parent companies, or joint-venture partners (with the Tuscarora Gas Pipeline Company specifically singled out in these provisions). It should be noted that the cumulative impacts of the Tuscarora project in combination with the Alturas project have been comprehensively addressed in the EIR/S for this project and that an alternative route through Secret Valley, well to the east of the Tuscarora route, has also been thoroughly considered (along with the numerous other alternatives considered in this EIR/S process).

The scoping meetings, including the referenced scoping meeting in Susanville on May 17, 1994, were conducted in a manner that was fully receptive to all EIR/S scoping comments and fully compliant with CEQA and NEPA; the scoping meeting transcripts are part of the public record for this project and are available for review. The remainder of this comment appears to pertain specifically to the CPUC's Certificate of Public Convenience and Necessity process and not to the EIR/S; therefore it has been ascertained that the appropriate recipient at CPUC for such considerations has also received a copy of this comment letter.

GP.144-2 Please see response to comment TA.1-1.

GP.144-3 The identification and location of environmental resources has been conducted by a team of experience environmental scientists, under the direction of the Lead Agencies and in coordination with the responsible agencies (see Section A.5). The base maps at the end of Volume I of the Final EIR/S illustrate the study corridor that was addressed.

GP.144-4 See response to comment GP.52-2.

GP.144-5 Section A.6.9.1 of the Final EIR/S has been expanded to provide an update on the current System Operation Review of the Columbia River system and how it would affect SPPCo's access to the Pacific Northwest power market.

SET # GP.145 WILLIAM P. MOYER

GP.145-1 Commented noted. Please see response to comment GP.28-1.

GP.145-2 See response to comment GP.30-1.

GP.145-3 See response to comment GP.25-1.

SET # GP.146 KEN BECHTOL

GP.146-1 Please see the revised Policy Consistency analysis (page C.8-45) for an analysis of the consistency of the Proposed Project with the Sierra County General Plan.

GP.146-2 See Section A.6 of the Final EIR/S for a complete discussion of the purpose and need of the project.

GP.146-3 See response to comment GP.146-1 regarding plan and policy consistency of the Proposed Project. See response to comment OC.20-1 regarding impacts of the Proposed Project on the Dog Valley area. Responses to comments GP.1-3 and GP.14-11 discuss the use of the LADWP 1000 kV transmission line right-of-way as a joint utility corridor.

SET # GP.147 SHERYL AND JEFFREY BROWN

GP.147-1 Please see responses to comments GP.1-3 and GP.14-11.

SET # GP.148 LEE ROGER ANDERSON

GP.148-1 Please see response to comment GP.14-38.

GP.148-2 Comment noted. Sections C.8.2.3.3 and C.8.2.3.1 of the Final EIR/S addresses the inconsistencies of the Proposed Project with the Modoc, Lassen, and Sierra County General Plans and the Modoc and Toiyabe National Forest Land and Resource Management Plans.

GP.148-3 See response to comment GP.41-7. Section C.8.2.3.1 of the Final EIR/S addresses the inconsistency of the Proposed Project with the Modoc National Forest Land and Resource Management Plan policy regarding placement of new transportation and utility corridors.

GP.148-4 Section C.8.2.3.3 of the Final EIR/S addresses the inconsistency of the Proposed Project with the Modoc County General Plan policy regarding development of transmission lines.

GP.148-5 See response to comment GP.41-7. Section C.8.2.3.3 of the Final EIR/S addresses the inconsistency of the Proposed Project with Modoc County General Plan, Policy 33, regarding use of existing transmission or other utility corridors.

GP.148-6 From the overall project perspective involving the proposal to connect the BPA system with the Reno area (a distance of 160 miles or more), it is clear that there are no reasonably direct currently-designated transmission line corridors that would be appropriate for the subject Proposed Project. However, numerous alternatives to the Proposed Project have been considered, including the detailed analysis of Segment B as an alternative to Proposed Segment A that would not result in new transmission line facilities in Modoc National Forest. The EIR/S also considered a variety of alternatives to the proposed routing of Segment C, including an alternative extending eastward from Alturas to the LADWP corridor in northwest Nevada (the Nevada Route Alternative, see Section B.3.4.6.2), as well as numerous other transmission alternatives (Section B.3.4.6) and the U.S. Forest Service (USFS) Alturas Alignment (Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative and the USFS Alturas Alignment in the Final EIR/S. See response to comments GP.1-3 and GP.30-1 for further discussion of alternatives addressed. In conclusion, a full range of reasonable alternatives has been considered.

GP.148-7 The EIR/S presents the results of the scoping and alternatives identification, screening, and assessment processes as they were applied in the evaluation of Sierra Pacific Power Company's (SPPCo's) applications to the CPUC and BLM for the proposed Alturas Transmission Line Project. As required by CEQA, based on the major objectives of the project, a wide variety of alternatives that could potentially fulfill those objectives were identified and considered in the alternatives screening process, without the limitations of the boundaries of a specific study area (see Section B.3). For example, various transmission, generation, system enhancement and technology alternatives were considered that would not involve the general area between Alturas and Reno. The identification and screening process involved consideration of SPPCo's application and Preliminary Environmental Assessment (which was deemed complete by the Lead Agencies before the scoping process for the EIR/S was initiated), numerous comments from public agencies and the general public, and scoping comments and suggestions brought forward from a wide variety of resource specialists within the Lead Agencies and the EIR/S preparation team. Key screening criteria included technical feasibility and potential environmental impacts and opportunity to avoid impact across all of the environmental issue areas considered in the EIR/S (air, biological resources, cultural resources, etc.).

For specific alternative routes determined to merit full consideration and study (including detailed field surveys) by virtue of their potential for impact reduction and environmental advantage, the Lead Agencies

determined that the 660-foot study corridor was sufficient to provide for an adequate margin of safety for fully designating resources in the field for impact analysis, and most importantly, for mitigation and avoidance during detailed design and at the time of construction. Section B.2.2.1 of the Final EIR/S presents how the collected resource data within the 660-foot study corridor was utilized to optimize the routing of the proposed and alternative segments within the study corridor to minimized impacts. As indicated in the Final EIR/S (Section D.2), not all of the Applicant-proposed segments are considered to be environmentally superior. With respect to the impacts analysis itself, significance criteria and assessment methodologies are described in Part C of the EIR/S for each of the 12 environmental issue areas considered.

GP.148-8 With respect to the comparison of alternatives, the methodology, information considered, and conclusions are presented in detail in Section B.3 and Part D of the EIR/S. Please note that some minor revisions and clarifications have been made to Section B.3 and Part D in the Final EIR/S. For those alternatives carried forward for full analysis, the conclusions and findings of Part C (Environmental Analysis) and the Impact Summary Tables were brought together in a comparison matrix in which the impacts, by environmental issue area and impact type, were considered in detail (see Part D). Based on these side-by-side comparisons, by issue area, the alternative that offers a clear or minor environmental advantage for that issue area was designated (or if no advantage was discernible this was so designated). Based on the array of these designations (presented in Table D.2-1) the environmentally superior alternative was designated, with the key factors in the designation highlighted in Section D.2.1. With respect to the No Project Alternative (considered on an issue-by-issue basis in Part C of the Draft EIR/S) and the various transmission alternatives considered in Section B.3.4.6.2 of the Final EIR/S, it was found that these alternatives did not offer potential environmental advantages over the Proposed Project. Regarding the Route Refinement Process described in Section B.2.2.1 of the Final EIR/S, this was a preliminary resource-based procedure by which SPPCo utilized the GIS-mapped information to adjust its proposed centerlines within the 660-foot study corridors (and subsequently revised its project description for its applications); this was done prior to and independent of the impact analysis for the EIR/S. That is why this process is described in the project description section of the EIR/S (Section B.2.2.1).

With respect to the 300-foot figure, this was generally considered to avoid or mitigate future residential land use impacts, based on such factors as the drop-off of electric and magnetic field levels and visual impacts. However, note that CPUC and BLM, for the purposes of this EIR/S, are obligated to consider the impacts of this project and alternatives - and just because certain choices may have been made in the past (for example, allowing residential development immediately adjacent to a high voltage transmission line), those choices should not necessarily be favored in the present, but rather, lessons learned from the past should be applied wisely in the present (particularly to avoid repetition of past mistakes). Finally, open space and long-distance vistas are given great consideration of both visual resources and land use and recreation impacts, and, by extension, in alternatives comparison.

GP.148-9 The facts supporting the conclusion that Proposed Segment A is environmentally superior to Alternative Segment B are clearly stated in Final EIR/S, Section D.2.1. Key factors considered includes the avoidance of the visual and land use impacts of the transmission line and substation, which would be closer, visually prominent features under Alternative Segment B to the great majority of the

Alturas community. It has been clearly recognized that Segment A would have disadvantages in the biological and cultural resources areas and the geology and soils areas.

The impacts analysis addresses all potential adverse impacts and would not necessarily give more importance to increased siltation and pollution in or from a remote area in contrast to an area nearer a populated area. In some cases the impacts nearer the populated area are more important. The most important point is the nature and quantity of the impact. The principal proposed substation site at the Devils Garden may be in an area that is considered by some to be more beautiful and desirable, but that may be a value judgement not shared by all interested parties. The geological materials at the Devils Garden site are thin soils overlying hard basaltic lava flows, and the site is not near an active perennial stream. These conditions and materials are much less likely to be substantially disturbed during construction or to be eroded so as to contribute increased silt, mud, and pollutants to the region's rivers, streams, and ground water. These impacts would be adverse if unchecked, but could more easily be reduced to a level of not significant by Mitigation Measures G-11 and B-7 than the alternative Mill site.

Because the alternative substation site (Mill Site) is (1) within the broad lowlands of the Pit River Valley, (2) is in close proximity to the Pit River and its tributaries, and (3) is on surficial materials consisting of unconsolidated alluvial soils, there is a greater potential for erosion during construction, operations, and during storms. Disturbance of the ground and construction activities could result in introduction of silt, mud, and pollutants directly into the Pit River. Mitigation Measures G-11 and B-7 could reduce these impacts to levels of not significant, but it would probably require more effort than at the proposed Devils Garden site.

GP.148-10 See response to comment PA.8-14.

GP.148-11 Section C.8.2.2 of the Final EIR/S addresses significant, non-mitigable degradation of recreational uses, which include use of open space. See responses to comments GP.14-32, GP.20-6, and GP.41-11 regarding significant degradation of additional recreational areas. The significance criteria for impacts to agricultural uses in the EIR/S do not include degradation of the quality of these uses.

GP.148 -12 The 300-foot separation distance in most locations is a characteristic of the project description, as proposed by SPPCo. Mitigation Measure L-13 is provided as a recommendation only. See responses to comments GP.8-2 (second paragraph) and GP.148-8.

One of the purposes of a CEQA or NEPA document is to provide feasible and effective mitigation measures based on current knowledge. Therefore, a mitigation measure presented in a CEQA or NEPA document could set a precedent. Identifying a 300-foot setback of the proposed transmission line from existing residences does not imply that existing transmission lines closer to residences are no longer acceptable, rather that the 300-foot setback for the Proposed Project could be appropriate based on current knowledge and public concern.

GP.148-13 Degradation of the quality of recreational uses is identified in the EIR/S as significant, non-mitigable **(Class I)** for some recreational areas, and adverse but non-significant **(Class III)** for other

recreational areas. Section C.8.2.2 of the Final EIR/S address significant, non-mitigable degradation of recreational uses at specific recreational areas. See responses to comments GP.14-32, GP.20-6, and GP.41-11 regarding significant degradation of additional recreational areas. See response to comment GP.6-1 for a summary of project impacts.

GP.148-14 Section C.10 of the EIR/S presents a summary of EMF research and the CPUC "Low Cost Mitigation Policy" for EMF. The results of the EMF impact analysis is carried forward in the consideration of land use impacts (Section C.8) and comparison of alternatives (Part D). No inconsistencies are noted.

GP.148-15 The 300-foot separation distance noted in the Final EIR/S is a characteristic of the Alturas Transmission Line routing as proposed by SPPCo.

GP.148-16 The EIR/S Visual Analysis does not reference a 300-foot setback as mitigation. However, a 300-foot setback is proposed as a characteristic of the Proposed Project at all locations, except for a residence on Segment L and on apartment complex on Segment X. A description of the visual analysis methodology applied in this EIR/S is provided in Section C.13.2.1 of the Final EIR/S.

GP.148-17 The statement noted by the commenter is only a summary statement of a more detailed analysis presented in the Visual Resources Section (C.13). While skylining (structures extending above the horizon line) would occur along Proposed Project Segment A, skylining would also occur along Alternative Segment B as illustrated in Figures C.13-20B-21B, and -22B. Also, the Mill Site Alternative Substation Site, which must be considered as part of Alternative Segment B, contributes to the overall significant visual impact of Alternative Segment B.

GP.148-18 The visual analysis methodology used in this EIR/S is based on an adaptation of the visual analysis methodologies of the U.S. Forest Service and the U.S. Bureau of Land Management. Both systems emphasize preservation of the visual quality of wilderness areas, primitive areas, and other special classified areas. However, for federal lands that do not qualify as special status categories such as those described above, both systems emphasize visual resource preservation of areas that receive greater public visitation or exposure over areas that receive less public visitation or exposure. The proposed Devils Garden Substation site will effectively be screened from most views from Crowder Flat Road. Further, the number of people that will be able to view the Alternative Mill Site will be significantly greater than the number of people driving off-road in the Devils Garden area. See revisions to Section C.13 regarding the application of the visual analysis methodology to private lands.

See also response to comment PA.7-18.

GP.148-19 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

GP.148-20 This EIR/S recognizes the importance of open vistas and expansive views. As discussed in Section C.13.2.2.4 of the Final EIR/S, the potential visual impact of Proposed Project Segment A on the open pastoral landscapes and the Pit River plain south of Hwy 299, are considered a significant Class I visual impact. However, it should be re-emphasized that a project feature in the foreground of a given view will be more visually prominent and impacting, than a similar feature in the distant background of the same view.

GP.148-21 Comment noted. See responses to comments GP.1-3, GP.6-1, and GP.30-1.

H.2 RESPONSES TO COMMENTS FROM ORGANIZATIONS AND CITIZEN GROUPS (OC)

SET # OC.1 NEIGHBORS OPPOSING POWER ENCROACHMENT (N.O.P.E., GORDON AND MARYLIN DICK)

OC.1-1 Please see responses to comment GP.1-3 and GP.14-11. To access the North Valley Road Substation as suggested by the commenter, the Proposed Project would likely need to traverse the populated areas of Sun Valley or Spanish Springs, imposing a similar magnitude of impact as traversing northern Sparks and Reno.

OC.1-2 As presented in Table B-4 , Construction Access Route, three new access roads and five permanent overland routes would be developed as part of the Proposed Project. In addition, 14 existing 4-wheel drive roads would be upgraded. Finally, several temporary overland travel routes would be utilized. All access roads, except the temporary overland routes, would be used for maintenance purposes; the temporary overland routes would be restored. As discussed in Section B.2.4.2, Maintenance of Project Facilities, SPPCo does not propose to maintain any of the permanent access routes for maintenance activities.

SET # OC.2 · N.O.P.E. (MARIA R. CANTRALL)

OC.2-1 Your concern for the Infernal Caverns Battlefield location is noted. The EIR/S states that there would be some impact to the integrity of setting by introduction of new visual elements in the general area, depending on one's vantage point. However, through implementation of the proposed interpretive program, visitor appreciation of this important cultural resource would be enhanced and would serve to mitigate the potential adverse effects from the introduction of new visual elements into the area from certain vantage points to Class II.

OC.2-2 Please see responses to comments GP.1-3 and GP.14-11.

OC.2-3 Waterfowl and greater sandhill cranes use the Pit River corridor area. Impacts to these species have been described in Section C.3.2.2.3. Additional waterfowl and crane surveys were conducted in Spring, 1995. The results of these surveys are provided in Appendices E.8 and E.10, respectively, of the Final EIR/S.

OC.2-4 Please see Section C.3.2.2.3 for discussion of the impacts to wildlife in the vicinity of Segment A. Although significant mule deer habitat loss and bird loss through collision with transmission

lines are anticipated to occur, these impacts are mitigable to non-significant levels through Mitigation Measures B-9, B-13, B-20, B-21, B-22, and B-23. These measures provide for restoration of temporary mule deer habitat loss, the establishment of offsite compensation habitat for permanent habitat loss, bird flight diverters to mark the transmission lines, and additional offsite compensation for sandhill cranes. See also Appendices E.8 and E.10, of this Final EIR/S for additional survey results for waterfowl and cranes, respectively.

OC.2-5 See responses to comment GP.136-1 and GP.137-1. The corridor passes the location of the Lassen Trail.

OC.2-6 See responses to comments GP.41-24 and GP.135-13.

SET # OC.3 COMSTOCK ARABIAN ASSOCIATION (BOB RAMSEY)

OC.3-1 Section C.8.2.2 has been revised to include a discussion of the recreational impacts to Peavine Peak.

SET # OC.4 NEVADA ALL STATE TRAIL RIDERS (MICHAELE TRISTRAM)

OC.4-1 Section C.8.2.2 has been revised to include a discussion of the recreational impacts to Peavine Peak. The project Applicant has not indicated that access would be restricted other than potential short-term restrictions during project construction.

SET # OC.5 RESIDENTS OF ANDERSON ACRES

OC.5-1 Comment noted. Please see response to comment GP.28-1.

SET # OC.6 RESIDENTS OF HORIZON HILLS

OC.6-1 Comment noted. See responses to comments GP.25-1 and GP.28-1.

SET # OC.7 RESIDENTS ALONG ALTERNATE ROUTE WCFG

OC.7-1 Please see response to comment GP.25-1.

OC.7-2 The comparison analysis of Proposed Segment W to Alternative Segment WCFG has been revised in the Final EIR/S, Part D, to consider the residences located near Alternative Segment WCFG. Based on the land use and visual impacts to the WCFG alignment, Proposed Segment W has been deemed environmentally superior to Alternative WCFG. See response to comment GP.30-1 for a discussion of alternatives considered in this EIR/S.

SET # OC.8 LASSEN SPORTSMEN CLUB (JOHN R. GAITHER)

OC.8-1 Comment noted. Sections B.3.4.3 through B.3.4.6 of the Final EIR/S discuss the various system alternatives addressed. As discussed in the noted sections, with the exception of some

transmission alternatives, the other system alternatives were incapable of reasonably satisfying at least one of the project objectives (CEQA alternative screening criteria - see Section B.3.2). For those transmission alternatives that could satisfy the project objectives, either individually or collectively, an assessment of their environmental impacts was conducted (see Section B.3.4.6.2). This analysis concluded that the subject transmission alternatives do not provide environmental advantage in comparison to the Proposed Project (another CEQA screening criteria - see Section B.3.2). Please see responses to comments GP.14-11, GP.30-1, and GP.52-3. Section A.6 of the EIR/S discusses the economic benefits of the Proposed Project.

SET # OC.9 LONG VALLEY AREA PROPERTY OWNERS (JOHN R. GAITHER)

OC.9-1 The environmentally superior route is identified in Part D of the EIR/S. An alternative on the west side of Long Valley in the subject area was screened out, primarily due to biological resources and land use issues, as described in Section B.3.4.1 of the Final EIR/S. Alternative Segment Z is considered the environmentally superior alternative and NEPA Lead Agency preferred alternative, as described in Section D.2 of the EIR/S. The comment regarding opposition to the project is noted and will be considered by the CPUC and BLM in their decisions on the Proposed Project.

OC.9-2 Please see response to comment OC.9-1. In addition, numerous other alternatives to routing in the subject area have been considered in the EIR/S, including the No Project Alternative, various transmission alternatives for bringing power into the Reno-Sparks area from the east (see Section B.3.4.6), generation alternatives (Section B.3.4.3), system enhancement alternatives (Sections B.3.4.4), and alternative alignments that would pass to the east of Petersen Mountain (Eastside Routes 1 and 2, Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative and Eastside Routes 1 and 2 in the Final EIR/S. None of the alternative routes were considered to be superior to the Proposed Project in combination with Segment Z. However, a further shift of the route to the east would bring about greater impacts due to ground and habitat disturbance associated with access and construction of the transmission line.

SET # OC.10 N.O.P.E. (DON PRATHER)

OC.10-1 Please see responses to comments GP.8-2 and GP.52-2 for a discussion of EMF impacts.

OC.10-2 As discussed in Section B.3.4.6.2 of the Final EIR/S (Section C.14 in the Draft EIR/S), the Nevada Route Alterative would need to traverse the northern Sparks and Reno areas to access the North Valley Road Substation, the required termination point of the Proposed Project (see Section A.6 for complete discussion). The northern areas of Sparks and Reno are primarily residential with densities of 3 to 21 dwelling units per acre. These densities are much higher than the Proposed Project which traverses rural environments, except the very southern terminus. As a result of this higher density, the Nevada Route Alternative would subject more people (children and adults) to EMFs, because a minimum separation distance of 300 feet between the Proposed Project and residential receptors (except for one residence on Segment L and an apartment complex on Segment X) would not be feasible. See Section C.10.2.3.1 of the EIR/S for a complete discussion of electric and magnetic field impacts.

SET # OC.11 N.O.P.E. (JAMES J. BROWN)

OC.11-1 See revisions to Section A.6.9.1. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

OC.11-3 Please see response to comment OC.11-1.

OC.11-4 Access requirements in the vicinity of Infernal Caverns would consist of an intermittently bladed single-lane overland route along the Proposed Project's right-of-way. This access route would be located slightly more than a mile to the west of, and on the plateau above, Infernal Caverns and would not be visible from Infernal Caverns.

OC.11-5 The Pit River is used by migratory waterfowl, shorebirds, wintering raptors, and nesting ground birds such as greater sandhill cranes, Canada geese, and northern harriers. Section C.3.2.2.3 of the EIR/S addresses the potential impacts to avian species as a result of the Proposed Project.

Transmission lines are known to be a significant cause of mortality among certain crane populations; however, this is not the number one cause of death among migratory birds. Section C.3.1.2.3 and Appendix E.1 of the EIR/S include a discussion of the existing conditions at the Modoc National Wildlife Refuge regarding collisions with utility lines on the refuge. In the Klamath Basin, which is used as a stopover for waterfowl during migration each year, thousands of waterfowl are killed by avian cholera. In addition, botulism is responsible for a significant number of deaths among waterfowl during the summer months.

SET # OC.12 N.O.P.E. (SHARON J. BROWN)

OC.12-1 Please see responses to comments GP.8-2, GP.52-2 and GP.89-1 (second paragraph).

OC.12-2 With respect to the corridor issue pertaining to the Modoc National Forest, the specific decisionmaking requirements and land use issues are further clarified in the revised Sections A.4, and C.8, and E.3.3 of this Final EIR/S. Numerous alternatives to the Proposed Project have been considered, including the detailed analysis of Segment B as an alternative to Proposed Segment A that would not result in new transmission line facilities in Modoc National Forest. The EIR/S also considered an alternative extending eastward from Alturas to the LADWP corridor in northwest Nevada (the Nevada Route Alternative, in Section B.3.4.6.2), as well as numerous other transmission alternatives (Section B.3.4.6) and the U.S. Forest Service (USFS) Alturas Alignment (Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative and the USFS Alturas Alignment, as well as to the comparison between Segments A and B in this Final EIR/S (see Sections B.3, B.4, and Part D). In conclusion, a full range of reasonable alternatives has been considered.

Section E.3.3, Potential Growth-Inducing Effects, has been revised to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including future utility corridor ramifications.

OC.12-3 See response to comment GP.25-1.

SET # OC.13 FRIENDS OF PEAVINE, INC. (KIRK ODENCRANTZ)

OC.13-1 Comment noted. Please see responses to comments GP.10-1, GP.28-1, and GP.30-1. See Section C.3 of the EIR/S for a complete discussion of access road restoration.

OC.13-2 Aquatic sources along Segments X and Y consist of streams and springs. Two riparian streams which are jurisdictional features along these segments are marked on Base Maps 31 and 32 at the end of Volume I of the EIR/S. Other streams along Segments X and Y are not jurisdictional features, but procedures to protect these resources would be in effect through the implementation of Mitigation Measures G-1, G-7, G-8, G-11, and H-3 through H-6.

Springs occur near the corridor near Mileposts 159 and 161. Efforts will be taken to avoid these springs; no structures will be placed within active springs. Mitigation Measures H-5 through H-8 will ensure that any impacts would be reduced to a level of insignificance.

The Proposed Project would not affect streams or creeks in the vicinity of the project area. The proposed transmission line would span these areas and restrictions are applied during construction of the project. Watercourses and streams in the vicinity of the project area protected and a California Department of Fish and Game Stream Alteration permit would be required if any activities occur in these areas. All streams are protected by a 200-foot buffer as specified in the EIR/S, and biological monitors will be present when work occurs in these areas to ensure compliance with this restriction.

OC.13-3 Portions of Peavine Peak area that would be traversed by the Proposed Project or the alternative alignments do not support trees due to climatic limitations and competition from native shrubs, which are more tolerant of seasonal soil moisture deficits (Billings, 1950). This is demonstrated by the presence of isolated stands of ponderosa and jeffrey pine on soils that have been hydrothermally altered. These soils possess chemical characteristics that exclude the zonal Great Basin vegetation which would otherwise out-compete the trees. Ponderosa pine is the only species of tree that is located in the project study corridor in the vicinity of Peavine Peak. The Proposed Project would not impact any stands of ponderosa pine growing on hydrothermally altered andesite soils. No mitigation is proposed to replace trees on Peavine Peak because the Project would not remove any trees.

Impacts to big sagebrush scrub are not considered significant and no mitigation is proposed for impacts to this vegetation type. Impacts to low sagebrush scrub and sagebrush-bitterbrush scrub are considered significant. Mitigation for impacts to these plant communities include onsite restoration of affected areas and offsite compensation for residual impacts. Please refer to the EIR/S for more detail regarding the assessment of impact significance and mitigation measures for significant impacts to plant communities. Specific guidelines for mitigation implementation will be detailed in the Community Habitat and Restoration Plan under preparation.

OC.13-4 Three sites on Segment Y which have been provisionally recommended as potentially significant are prehistoric lithic scatters. These sites are provisionally recommended as significant based on their potential to yield information important in history or prehistory.

Specific site location is considered confidential and cannot be released to members of the public without prior approval of the lead Federal agency. These sites are approximately two miles east of the site of Poeville.

OC.13-5 The Project Applicant is proposing to construct the transmission line structures of certain steel which will oxidize to a natural rust color. With regard to screening the Proposed Project by planting shrubs and trees, the height of the proposed structures and the often rocky and steep terrain that the Proposed Route would cross would not be conducive to effective Project screening. However, portions of the Proposed Route do make use of intervening hills and ridges to help screen the Proposed Project from public view. Underground of the transmission line would mitigate the visual impacts of the project, but would leave residual scarring, until revegetation efforts are complete (see Section C.3 of Draft EIR/S). Response to comment GP.10-1 discusses the feasibility of undergrounding the Proposed Project.

OC.13-6 The kindness of the offer is acknowledged. However, the area has already been subjected to detailed reconnaissance and field surveys by members of the EIR/S preparation team and our overall workload and schedule requirements in preparing the Final EIR/S for approximately 280 miles of proposed and alternative transmission line corridors preclude us from such further field study activity in the subject area.

SET # OC.14 SECRET VALLEY RANCH PROPERTY OWNERS

OC.14-1 Comment noted; also, please see response to comment GP.143-3. Sections C.10.2.3.3 and C.11.2.2.4 of the Final EIR/S discuss the fire risk imposed by the Proposed Project and the availability of public fire fighting services, respectively.

OC.14-2 See response to comment GP.2-2.

SET # OC.15 FORM LETTER FROM RESIDENTS OF RENO

OC.15-1 Comment noted. Please see responses to comments GP.6-1 and GP.30-1. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

SET # OC.16 FORM LETTER OPPOSING INSTALLATION OF SUBSTATION AND POWERLINE IN LONG VALLEY

OC.16-1 Comment noted. Please see responses to comments GP.6-1 and GP.30-1. The land use and visual impacts of the Proposed Project on Long Valley and the Toiyabe National Forest are discussed in Sections C.8 and C.13 of the Final EIR/S, respectively.

Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

SET # OC.17 HORIZON HILLS GENERAL IMPROVEMENT DISTRICT

OC.17-1 The comment is noted and will be considered by the CPUC and BLM in their decisions on the Proposed Project. Please see response to comment GP.30-1. Numerous alternatives to routing in the subject area have been considered in the Draft EIR/S, including various transmission alternatives for bringing power into Reno from the east (see Section B.3.4.6), generation alternatives (Section B.3.4.3), system enhancement alternatives (Section B.3.4.4), and an alternative route that would terminate at North Valley Road Substation after an approach from the north (Eastside Route 2, Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative and Eastside Route 2 in the Final EIR/S. None of these alternatives were considered to offer substantial potential for impact reduction relative to the proposed route. The provided information has been considered in the EIR/S.

OC.17-2 See response to comment GP.25-1.

OC.17-3 The Proposed Project impacts to Peavine Peak are presented in Section C.8.2.2 of the Final EIR/S.

OC.17-4 See responses to comments GP.2-2 and GP.39-1.

OC.17-5 Power lines in the Horizon Hills area would not whistle in the wind. Please see the response to comment TR.24-1 for a detailed discussion of this concern.

OC.17-6 See response to comment OC.17-3.

OC.17-7 The Proposed Project would not include construction or structure placement in the riparian zones. A 200-foot buffer would be maintained in these areas. In addition, preconstruction surveys would be performed to identify raptor nests and other sensitive resources in the vicinity of the Proposed Project. If these resources are identified, construction would be prohibited until the breeding season is concluded. The buffer zone for nesting raptors includes 0.5 mile from active nests. See response to comment OC.17-3.

OC.17-8 See responses to comments GP.8-2 and GP.52-2. As discussed in Section C.10.1.2.3 of the Final EIR/S, the area of analysis with respect to EMFs has focused on long-term exposure. Persons recreating within proximity to the transmission line would be exposed to EMFs for limited time durations.

OC.17-9 The impact of corona noise is discussed in detail in response to comment GP.76-4. There would occur no significant noise impact at a distance of 2000 or more feet from the proposed transmission line.

OC.17-10 See response to comment GP.68-1.

OC.17-11 See response to comment GP.59-3.

OC.17-12 Comment noted. EIR/S Sections C.13.1.3.12 and C.13.2.2.4 (Segment X), describe the subject portion of Proposed Segment X (XØ7 and XØ9) and the anticipated visual impacts in the vicinity of Horizon Hills.

OC.17-13 See responses to comments GP.1-3, GP.14-11, and GP.52-3.

SET # OC.18 N.O.P.E.

OC.18-1 This issue was addressed by the CPUC in mid-1994 to limit the environmentally disturbing activities that the Applicant may carry out before receiving application approval. With respect to the helicopter issue, please refer to response to comment GP.41-15.

SET # OC.19 CITIZENS FOR PRESERVATION OF LONG VALLEY

OC.19-1 Please see responses to comments GP.14-17 and GP.52-3.

OC.19-2 See responses to comments GP.28-1 and GP.30-1. Your concerns regarding the historical significance of Long Valley is noted. Many of the valley systems intersected by the route are characterized by and thematically linked by ranching and open range grazing. As such, it is difficult to identify discrete, bordered sections or regions that qualify as the typically defined rural historic landscape. The pervasive nature of ranch and open grazing throughout the project area is so broad, that application of the concept "rural historic landscape" exceeds the intent of the guidelines. Taken in a broader context, Long Valley has been developed and modified up to the present. Modern elements include a four-lane highway, mobile homes, and commercial structures.

OC.19-3 See responses to comments GP.14-17 and GP.30-1. See revisions to Section B.3.4.2 regarding expansion of the North Valley Road Substation.

SET # OC.20 FORM LETTER REGARDING RECREATIONAL USE OF SIERRA COUNTY ROAD 570

OC.20-1 Long Valley Road (County Road 570), would be crossed by the proposed transmission line and would be used as a construction access route. It has an existing average daily traffic volume of approximately 100 vehicles per day and would likely carry higher volumes on active recreational weekends. Measures would be taken to ensure that this road would not be blocked for extended periods of time during construction unless an alternative detour route is established.

Section C.8.1.2 (under Sierra County Segment X) of the Final EIR/S has been amended to acknowledge recreational use of Long Valley Road. The analysis of impacts to recreational uses in Section C.8.2.2 of the Final EIR/S addresses all recreation areas included in the land use setting, including Sierra County Road 570. Sierra County Road 570 was not added to the list of recreation areas significantly impacted by the Proposed Project, because impacts to this recreation area were determined to be non-significant pursuant to the land use significance criteria.

SET # OC.21 BOY SCOUTS OF AMERICA, NEVADA AREA COUNCIL

OC.21-1 Please see response to comment OC.20-1.

SET # OC.22 U.S. HANG GLIDING ASSOCIATION, INC.

OC.22-1 If it is determined after construction of the transmission line that spherical markers (aviation balls) are needed on the lines to improve visibility and safety for the hang gliders, then a written request may be submitted to the Lead Agencies requesting that such objects be installed by the Applicant, subject to the review and approval by the Lead Agencies in consultation with the FAA (see revisions to Section C.12.2.2.1 in the Final EIR).

SET # OC.23 FORM LETTER FROM RECREATIONAL USERS OF TOIYABE NATIONAL FOREST AND DOG VALLEY

OC.23-1 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

OC.23-2 Section C.8 discusses the compatibility of the proposed and alternative Border Town Substation sites with adjacent land uses. Please see response to comment OC.20-1 regarding compatibility of Proposed Project with recreational uses of Sierra County Road 570.

OC.23-3 Please see response to comment OC.23-1.

SET # OC.24 FORM LETTER REGARDING BLM PARCEL NUMBER 021-090-02

OC.24-1 Please see response to comment OC.19-2 regarding the historical significance of Long Valley. See response to comment OC.20-1 regarding compatibility of the Proposed Project with recreational uses of Sierra County Road 570. See response to comment OC.23-2 regarding compatibility of the proposed Border Town Substation with adjacent land uses.

SET # OC.25 PETITION TO DENY ACCESS TO SIERRA PACIFIC POWER LINES ON PEAVINE RANCH

OC.25-1 Comment noted. Sections C.8.2 and C.13.2 of the Draft EIR/S discuss recreational and land use impacts, respectively, and the consistency of the Proposed Project with federal, state, and local land use and visual policies. Please see response to comment GP.28-1 for a summary of project impacts in the vicinity of Peavine Peak.

SET # OC.26 CITIZEN ALERT (M. LEE DAZEY)

OC.26-1 Comment noted. Please see responses to comments GP.1-3, GP.1-3B, GP.6-1, GP.10-11, GP.14-11, GP.30-1, and GP.52-3.

OC.26-2 See responses to comments GP.8-2 and GP.52-2.

OC.26-3 Sections C.10.1.3.4 and C.10.2.3.2 of the EIR/S provide a complete discussion of induced current impacts.

OC.26-4 See Section C.2.2.4 of the Final EIR/S for a complete discussion of cumulative project particulates during construction and operation.

OC.26-5 Comment noted. The presence of the right-of-way is not expected to impact tourism in the Reno area. Section C.8.2.2 of the Final EIR/S has been modified to include a discussion of the impacts of the Proposed Project on Rancho San Rafael Park.

SET # OC.27 IDAHO POWER COMPANY

OC.27-1 As discussed in Section B.3.4.6.2 of the Final EIR/S, to satisfy the Proposed Project objective of improved service reliability for the Reno/Lake Tahoe area, a new 120 kV or 345 kV transmission line from the Tracy Substation to Silver Lake Substation was considered in conjunction with the Midpoint-Valmy Alternatives. Since these Tracy-Silver Lake alternatives would need to traverse northern Sparks and Reno, they were eliminated from further consideration because they did not reduce or eliminate the environmental impacts of the Proposed Project (please see response to comment GP.30-1 for a summary of CEQA screening criteria).

OC.27-2 As discussed in Section B.3.4.6.2 of the Final EIR/S, the Midpoint-Valmy Alternatives, in combination with the Tracy-Silver Lake Alternatives, satisfied all project objects with the exception of future interconnection to LMUD (secondary objective). As discussed in response to comment OC.27-1, these alternatives were eliminated from further consideration because they did not reduce or eliminate the environmental impacts of the Proposed Project.

OC.27-3 See Section B.3.2 for a complete discussion of the CEQA alternative screening methodology that was applied to all alternatives considered in this Final EIR/S.

SET # OC.28 CITIZENS FOR PRESERVATION OF LONG VALLEY (JAN LOVERIN)

OC.28-1 As discussed in response to comment GP.14-2, present and historic land ownership is not a factor considered under CEQA. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

Numerous alternatives to routing in the subject area have been considered in the Final EIR/S, including various transmission alternatives for bringing power into Reno from the east (see Section B.3.4.6), generation alternatives (Section B.3.4.3), system enhancement alternatives (Section B.3.4.4), and an alternative route that would terminate at North Valley Road Substation after an approach from the north (Eastside Route 2, Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative, Eastside Route 2, and alternatives to the Border Town substation site in the Final EIR/S.

None of these alternatives were considered to be superior to the proposed route and substation site. The provided information has been considered in the EIR/S.

OC.28-2 Please see response to comment OC.28-1.

OC.28-3 See response to comment OC.28-1.

OC.28-4 See responses to comment OC.28-1.

OC.28-5 See response to comment OC.28-1. The EIR/S has no authority over SPPCo's selection of proposed or alternative project sites and, therefore, does not "allow" the Project Applicant to design the Proposed Project. The EIR/S is a purely informational document, providing an analysis of the environmental impacts of constructing and operating the Proposed Project. One of the obligations of an EIR/S is to assess the specific project as proposed by the Applicant, which this EIR/S does. For example, the Applicant's project description as submitted to the Lead Agencies includes maps that designate the locations of its proposed angle points, including Angle Point XØ1, which the EIR/S assesses as part of the Proposed Project. The EIR/S is to be used by federal, state, and local agencies in making decisions on the Proposed Project and its alternatives.

Section C.8.3.8.2 has been revised in the Final EIR/S to acknowledge the alternative Border Town Substation site's inconsistency with the Pine Valley Subdivision CC&Rs. Section C.8.2 discusses the compatibility of the proposed Border Town Substation and alternative sites with adjacent land uses. It should be noted that the CC&R's can be amended to allow construction of the substation with the approval of Sierra County by the affirmative vote of 75% of the owners of the parcels in the development who are entitled to vote. In addition, eminent domain powers are not affected in acquiring properties with CC&R restrictions.

OC.28-6 The Final EIR/S discussion regarding Sierra County policy conflicts has been expanded. See revised Section C.8.2.3.3.

OC.28-7 See response to comment OC.19-2.

OC.28-8 See response to comment GP.52-3. Section A.6.2 has been revised to clarify the need for the Proposed Project.

OC.28-9 See Sections A.6.8.2 and B.3.4.3 for a complete discussion of to what extent generation can satisfy the project objectives, including improved service reliability.

OC.28-10 There is no direct correlation between the simultaneous import capability of SPPCo's system and the power rating of supplies, including generation. For example, SPPCo's current simultaneous import capability rating is limited to 360 MW, but as presented in Table A-3 of the Draft EIR/S, SPPCo's supply system in 1992 totaled 1172 MW. As clarified in Sections A.6.2.4 and A.6.5 in the Final EIR/S, the reliability concern associated with SPPCo's system is twofold: 1) two-thirds of their supply is accessing the Reno area via the Tracy Substation and 2) projected failure of the 120 kV line from Tracy Substation to Spanish Springs Substation.

OC.28-11 See revisions to Section B.3.4.2 regarding expansion of the North Valley Road Substation. As discussed in Section B.3.4.2, two options to substation expansion were considered: 1) two-tiered approach and 2) direct expansion of existing pad. The commenters' suggestion to move the expansion area to the top of SPPCo's property was not considered because of the extensive visual impacts that would result.

OC.28-12 The referenced text regarding Border Town has been revised in the Final EIR/S.

See response to comment GP.14-3 and revised Part E.3.3 of the Final EIR/S regarding growth in the North Valleys area of Washoe County.

OC.28-13 See responses to comments OC.28-1 and OC.28-11.

OC.28-14,15,16 Eastside Routes 1 and 2 have been given further consideration in the Final EIR/S, including consideration of the subject comments.

OC.28-17,18,19 The subject alternative substation sites have been given further consideration in the Final EIR/S (with appropriate revisions pertaining to APN 082-083-09), including consideration of the subject comments (see Section B.3.4.2). With respect to the wildlife area considerations, in general the key impacts relate to both loss of habitat for wildlife (for which reason these areas were established in the first place) and degradation of the visitor experience (including recreational and scientific uses) due to the presence of the substation and transmission line facilities.

OC.28-20 See response to comment OC.28-11.

OC.28-21 See response to comment GP.135-14. The area of potential effect for the corridor was defined as 660 feet wide at the time of this analysis. The Border Town substation study encompassed a significantly larger area (Base Map 30, at the end of Volume I) than the 660-foot-wide corridor used along the linear portions of the route. Additionally, the BLM has subsequently formulated a position that "historic properties" (see response to comment GP.135-14) identified by the public, also be addressed in the EIR/S for an area up to one mile each side of the centerline.

OC.28-22 See response to comment OC.19-2. Historic properties as defined by the guidance set forth in the implementing regulations found at 36 CFR 800 for the National Register of Historic Places are cultural resources listed or formally determined eligible for inclusion on the National Register. An architectural evaluation of Long Valley is beyond the scope of the EIR/S.

OC.28-23 The ranch property is outside of the original study area (see response to comment OC.28-21). Although not a historic property as defined in response to comment OC.28-22, given the immediate proximity to the alternative Border Town substation study area, we conclude that from a cultural resources standpoint the proposed substation location would be a superior choice. This conforms with the findings of the EIR/S which identified the proposed Border Town substation location as the preferred alternative. Your comment is noted regarding the National Park Service Bulletins Nos. 30 and 36. Bulletin No. 30 contains specific language stating "large rural districts may be able to absorb new development and still maintain their overall integrity, provided large scale intrusions are concentrated in

a relatively few locations and cover a proportionately small percentage of the overall acreage." Such is the case with the Proposed Project and would thus have no effect on application of the concept by others.

OC.28-24 The project's consistency with local policies is addressed in Section C.8.2.3.3 of the Draft EIR/S. See response to comment OC.20-1 regarding compatibility of the Proposed Project with recreational uses of Sierra County Road 570. Section C.8.2.2 discusses the compatibility of the proposed Border Town Substation with adjacent land uses.

OC.28-25 See response to comment OC.20-1 regarding compatibility of Proposed Project with recreational uses of Sierra County Road 570. The comments on the use of the upper end of Long Valley for snowmobiling and cross-country skiing are noted.

OC.28-26 It is assumed that the comment is in reference to impacts of the project on nearby residences. See response to comment letter OC.32.

OC.28-27 See responses to comments OC.20-1 and OC.28-25.

OC.28-28 The comment on zoning is noted and the text has been corrected accordingly in the Final EIR/S. The discussion of noise sources and levels, however, is accurate. The discussion of the relative noise impact of the alternative Border Town site has been changed to take into account the presence of a residence near the alternative Border Town site.

OC.28-29 Table C.13-3 has been revised to correctly indicate a VRM Class III designation for Route Segment VØ5 to XØ9. Table C.13-9 has been revised to correctly indicate an Impact Class I designation for Route Segment VØ5 to XØ2 and an Impact Class III designation for Route Segment XØ2 to XØ9.

OC.28-30 Section C.13.2.3 defines a cumulative impact as occurring "if one or more of the cumulative projects (as identified in Table B-13) is constructed within the same viewshed as the Proposed Project." There are no cumulative projects identified in Table B-13 that would be constructed within the same field of view as the Proposed Border Town Substation. In that context, no cumulative impact would occur. Section C.13.2.3 further states that: "It is also possible that a cumulative impact could occur if a viewer's perception is that the general visual quality of an area is diminished by the proliferation of visible structures (or construction effects such as ground scars), even if the structures are not all within the same field of view." Again, there are no cumulative projects proposed in the vicinity of Border Town Substation (either within the same field of view or within different fields of view) that would, in conjunction with Border Town Substation, contribute to a cumulative visual impact. Therefore, within this second context, a cumulative visual impact would not result from Border Town Substation. See revisions to Section E.3.3 with regards to the addition of future projects to Border Town Substation.

The passage referenced in the second paragraph of the comment indicates that the potential cumulative impact resulting from the proximity of Route Segment W04-W05 with the proposed Ski Resort/Golf Course in the Long Valley Balls Canyon area, would be "adverse but not significant due to the relatively limited number of viewers and the anticipated rural-recreational appearance of the ski resort." It is principally the "rural-recreational appearance" of the proposed Ski Resort/Golf Course and the lack of

an industrial appearance or sense of urbanization that leads to a conclusion of impact non-significance. It should be noted that the application for the subject resort with Sierra County has been withdrawn.

With regard to visual sensitivity and site visitation, the 100 vehicles per day figure referenced in Table C.12-1 is an approximate figure. At 100 vehicles per day and a vehicle occupancy range averaging 1 to 1.2 of persons per vehicle, approximately 36,500 to 45,000 site visits per year could occur.

OC.28-31 Recent VRM ratings of the Border Town Substation site by the Bureau of Land Management, have resulted in the site being assigned a "C" Scenic Quality Rating, Foreground Visual Element from County Road 570, and High Sensitivity. The resulting VRM Class is a Class III and is consistent with the information presented in the EIR/S. The meadow to the west of the substation site was assigned a "B" Scenic Quality rating and reclassified a VRM Class II.

OC.28-32 See revisions to Section E.3.3 for a discussion of the growth-inducement impacts of the Proposed Project as they relate to future growth in the North Valleys area.

OC.28-33 Sections A.6.7.5 and E.3.3 have been revised to include a more thorough discussion of the future LMUD interconnections.

OC.28-34 As discussed in Section B.3.4.6.2 and summarized on Table A-8, the Frenchman Tap Alternative provides only partial improvement in import capacity. The other two primary objectives of the Proposed Project, improved reliability and access to the Pacific Northwest power market, are not even partially satisfied by this alternative. When considering the Frenchman Tap Alternative in conjunction with other alternatives (see Section B.3.4.6.2) the combined alternatives could not reasonably satisfy the project objectives (for CEQA screening criteria - see Section B.3.2).

OC.28-35 Numerous other alternatives to routing in the subject area were considered in the Draft EIR/S, including alternative alignments that would pass to the east of Petersen Mountain (Eastside Routes 1 and 2, Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative and Eastside Routes 1 and 2 in this Final EIR/S.

OC.28-36 See response to comment OC.28-1.

OC.28-37 See response to comment OC.28-1.

OC.28-38 See response to comment OC.28-1.

OC.28-39 The Applicant has proposed landscaping for the proposed Border Town Substation. Mitigation Measure V-10 has been added to the Final EIR/S requiring that the Applicant prepare a Landscaping Plan for the substation, subject to the review and approval of the Lead Agencies.

OC.28-40 See response to comment OC.28-39.

SET # OC.29 CALIFORNIA NATIVE PLANT SOCIETY

OC.29-1 The Applicant is required to follow Lead Agency guidelines.

OC.29-2 The Applicant shall be required to replace all existing barriers to overland travel following construction. However, as noted in the comment, areas such as the Alturas volcanic gravels are very open and do not have natural barriers. Except where the Proposed Project would create new access to a sensitive plant community or plant populations, the Applicant would not be required to erect barriers to prevent ORV access. Under CEQA and NEPA, mitigation can only be assessed for direct or indirect impacts of a project. The Applicant is not responsible for mitigating existing impacts unrelated to the construction or maintenance of the proposed facility.

Offsite compensation is only used to mitigate for permanent impacts and to compensate for the residual impacts that remain following onsite restoration for temporary impacts.

OC.29-3 The text has been changed in the Final EIR/S as suggested.

OC.29-4 To the extent possible, the project design was modified to minimize or avoid special status plant habitats. However, some impacts were unavoidable. The classification of these impacts as "temporary" is based on application of Mitigation Measure B-5, which provides for restoring the impacted special status plants. A detailed restoration plan shall be required prior to construction (see response to comment PA.23-1). Restored areas shall be monitored to determine their effectiveness and contingency measures will be applied if success criteria have not been met. Offsite compensation shall be used to supplement restoration.

OC.29-5 Synergisms may exist between types of impacts; however, for assessment of impacts and application of mitigation, it was necessary to separate them. The final analysis, though, considers all potential impacts together. Introduction of non-native plant species is covered under Mitigation Measure B-8.

OC.29-6 Please see response to comment OC.29-4.

OC.29-7 Interested parties, such as the Shasta Chapter of CNPS, should request the CPUC or the BLM for an opportunity to review project plans. As the Lead Agencies for this project, providing for such review will be at their discretion.

OC. 29-8 See response to comment 29-7.

SET # OC.30 SIERRA CLUB 11

OC.30-1 Please see responses to comments GP.1-3B and GP.14-38. Sections A.6.8 and B.3 include discussions of to what extent the various alternatives considered satisfied the project objectives (see response to comment GP.30-1). Alternatives were eliminated if they did not satisfy, in a reasonable manner, at least one project objective. Alternatives that satisfied at least one of the project objectives, which were Transmission Alternatives, were considered in Section B.3.4.6.2. As presented in Section

B.3.4.6.2 of the Final EIR/S, the potential transmission alternatives did not provide environmental advantage in comparison to the Proposed Project. Therefore, these alternatives were eliminated from further consideration (see Section B.3.2 - alternative screening methodology). Sections A.6.4 and A.6.6 of the EIR/S present the economic benefits of the Proposed Project, including improved wheeling services and spot market purchases from the Pacific Northwest power market. Section A.6.2.4 presents the existing and projected limitations of SPPCo's system. Sections A.6.4, A.6.5, and A.6.6 discuss how the limitations (objectives) are satisfied by the Alturas Project. Increased import capability does not only allow wheeling and spot purchases, but also improves reliability which is the unique solution of the Proposed Project.

OC.30-2 County statements of opposition to the Proposed Project were adopted immediately prior to, or after, release of the Draft EIR/S. Conflicts with community environmental plans and goals are addressed in revised Section C.8.2.3.3 of the Final EIR/S. Also, see response to comment GP.135-5.

Section E.3.3 has been revised to include a more thorough discussion of the growth inducement aspects of the project.

OC.30-3 The fact that expectations for unimpaired scenic quality would typically be greater in more remote areas of the proposed route does not mean that there would be a significant visual impact wherever the Proposed Project is located in a remote area.

The second paragraph on page C.8-6 of the Draft EIR/S notes that a portion of the Segment O corridor passes through two corners of the Skedaddle Wildlife Study Area. See response to comment GP.135-5 regarding consistency of the Proposed Project with federal, state, and local plans, regulations, provisions, and policies.

Section C.8.2.3.2 has been revised to include a consistency analysis of the Proposed Project with Senate Bill 2431. Since the Westen Regional Transmission Association (WRTA) does not have regulatory influence over the Proposed Project, an analysis of the WRTA goals/policies was not conducted.

OC.30-4 The Piñon Pine Power Plant is located on the east side of SPPCo's system at the Tracy generating station, placing more supply on the Valmy-Tracy-North Valley corridor. As a result, this generation project would not improve service reliability to the Reno/Lake Tahoe area (see Sections A.6.2.4, A.6.5, and B.3.4.3 of the Final EIR/S). Alternatives that were capable of satisfying at least one of the project objectives were considered further in Section B.3.4.6.2 of the Final EIR/S with respect to several factors, including environmental impacts, utility corridor requirements, and timing of alternative permitting and design. This latter factor was presented since current CEQA case law states that a feasible alternative "...is one which can be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors" (see Section B.3.2.2 of EIR/S). However, this latter factor was given only minimal consideration in the EIR/S since the responsibility of planning for permitting timelines is the Applicants.

OC.30-5 No alternative considered in this EIR/S was eliminated because it was not the "Proponent's Preferred Project". The CEQA alternative screening criteria was systematically applied to each alternative (see Section B.3.2 for screening criteria). First, alternatives were assessed for their ability

to satisfy the project objectives (see Table A-8 for a summary of system alternatives addressed; alternative segments and substations did not affect the ability of the Proposed Project to satisfy the objectives). Secondly, for those alternatives that satisfied the project objectives (Transmission Alternatives), an assessment of their potential to provide environmental advantage in comparison to the Proposed Project was conducted (see Section B.3.4.6.2). The system alternatives that did not satisfy the project objectives are described in Sections B.3.4.3 through B.3.4.6.1 of the Final EIR/S.

Section A.6.2 presents the existing and projected limitations of SPPCo's system. Under the No Project Alternative (Section B.4.3) the EIR/S acknowledges that the impacts of the Proposed Project would not occur; however, given the limitations discussed in Section A.6.2, SPPCo would need to augment their system (see response to comment GP.52-3). Exactly how and when this augmentation would occur without the Alturas Project is not known, so an analysis of specific projects could not be conducted. Based on the independent review of SPPCo's existing system, projected growth, and project objectives by the Aspen Team utility engineer, it was concluded that a major transmission line would be required.

OC.30-6 See responses to comments OC.30-5 for a discussion of alternative screening, including generation alternatives. Section A.6.8 provides a discussion of to what extent alternatives could achieve the objectives of the Proposed Project. Since the economic benefits of access to the Pacific Northwest power market is an objective of the project, the discussion of generation alternatives included a general comparison of generation costs to inexpensive hydroelectric power. Section B.3.4.3 of the Final EIR/S provides a complete discussion of why generation alternatives were eliminated from further consideration in accordance with CEQA, by specific generation alternative (e.g., Pinõn Pine Power Plant, Fort Churchill Combustion Turbine, etc.). As presented in Section B.3.4.3, generation alternatives were not eliminated on the basis of costs. The addition of generation just to improve reliability could cause a glut of resources which are not used much of the time.

Section A.6.9.1 has been expanded to provide an update of the SOR and how it could affect SPPCo's access to the Pacific Northwest power market.

OC.30-7 See responses to comments GP.1-3B and OC.30-6.

OC.30-8 See response to comment OC.30-6.

OC.30-9 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

OC.30-10 See response to comment OC.30-9.

OC.30-11 See response to comment GP.14-38. Section A.6.9.1 has been expanded to provide an update of the SOR and how it could affect SPPCo's access to the Pacific Northwest power market.

SET # OC.31 GREEN GULCH RANCH

OC.31-1 The Draft EIR/S and the Final EIR/S, which responds to all of the comments on the Draft EIR/S and contains clarifications identified as appropriate, have been prepared by the Lead Agencies with the assistance of an independent third-party contractor. Substantial effort has been put into the analysis presented, involving the efforts of an expert interdisciplinary team. Information supplied by the Applicant (primarily relating to definition and clarification of the Proposed Project) has been subjected to independent analysis and verification throughout the EIR/S process. However, the Lead Agencies welcome any critical comments and, particularly, suggestions for improvement, which have been incorporated into the Final EIR/S to the extent feasible.

OC.31-2 Numerous alternatives to routing in the subject area and the Border Town Substation are considered in the EIR/S, including various transmission alternatives for bringing power into Reno from the east (see Section B.3.4.6.2), generation alternatives (Section B.3.4.3), system enhancement alternatives (Section B.3.4.4), and an alternative route that would terminate at an expanded North Valley Road Substation (Section B.3.4.2) after an approach from the north (Eastside Route 2, Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative, Eastside Route 2, and alternatives to the Border Town substation site, with this clarification presented in the Final EIR/S, including additional information on the independent consideration of the North Valley Road site as an alternative to Border Town. Still, none of these alternatives are considered to offer substantial potential for impact reduction relative to the proposed route and substation site.

OC.31-3 Sections B.3 and B.4 of the EIR/S include an analysis of various alternatives to the Proposed Project, including alternatives that could replace the project as a whole, either individually or collectively. The analysis presented in these sections is an assessment of the extent to which the various alternatives could achieve the project objectives (see Section B.3.2 of the Final EIR/S for a description of the CEQA/NEPA alternative screening criteria).

For those alternatives determined to be capable of satisfying this first CEQA/NEPA screening test (i.e., satisfy project objectives), application of the other CEQA/NEPA screening test criteria was applied: reduce or eliminate the environmental impacts of the Proposed Project, and technical and regulatory feasibility. As presented in Sections B.3.4.3 through B.3.4.6, of the Final EIR/S, the only system alternatives capable of reasonably satisfying at least one project objective was Transmission Alternatives (also see Table A-8 for a summary). It was noted in Section B.3.4.6.2 of the Final EIR/S that because SPPCo had only conducted preliminary technical feasibility analyses on some of the subject alternatives, no site specific information was available. As presented in Section B.3.4.6.2, the Transmission Alternatives addressed in this section were eliminated from further consideration since they did not offer environmental advantage to that of the Proposed Project and as a result, were not carried forward for a project level of detail analysis as required under NEPA.

OC.31-4 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

OC.31-5 The referenced pages have been revised in the Final EIR/S for clarity. Please consider, however, that "required" is used in the context of what has been *proposed* for the project. Use of this word in no way implies that no other option can be considered.

See revisions to Section B.3.4.2 in the Final EIR/S regarding expansion of the North Valley Road Substation.

OC.31-6 Refer to the response to comment OC.28-28.

OC.31-7 Table B-1 presents a mileage summary of the Proposed Project alignment by county and state. As presented in Table B-1, 138 miles of the Proposed Project alignment would be located in California. Figures B.2-1 and B.2-2c, and Base Maps 23 and 26 (at the end of Volume I of the Final EIR/S) illustrate the project alignment entering the State of Nevada near Honey Lake and reentering California in the vicinity of Long Valley.

The Draft EIR/S inadvertently failed to mention the short proposed segment east of the Fort Sage Mountains (in Nevada) in the brief overview proposed route description referenced in the comment. An alternative route that would terminate at North Valley Road Substation after an approach from the north, east of the Fort Sage and Dogskin Mountains (in Nevada) was considered in the Draft EIR/S (Eastside Route 2, Section B.3.4.1). Further consideration has been given to Eastside Route 2, with clarification of the analysis presented in this Final EIR/S.

OC.31-8 Section C.8.2 of the EIR/S addresses land use impacts of the Border Town Substation site. Section C.8.2.2 includes a discussion regarding the compatibility of the proposed Border Town Substation with adjacent land uses.

See the revised Policy Consistency Analysis (Section C.8.2.3.3) for an analysis of the consistency of the Proposed Project with the Sierra County General Plan, zoning ordinances, and goals and objectives for Long Valley. Please note that the CPUC asserts that the County permit requirements for the Proposed Project are pre-empted by the CPUC.

OC.31-9 Comment noted. The environmental setting for the Border Town Substation is presented in C.13.1.3.12, not C.13.1.3.15. The environmental impacts of the Border Town Substation is presented in C.13.2.2.3, Segment X, not C.13.2.6.16. These corrections have been incorporated into the Final EIR/S. In addition, Section E.3.3 has been revised to elaborate on the growth-inducement impacts of the Proposed Project.

OC.31-10 The term "adverse" is not synonymous with "significant"; significant impacts are those adverse impacts that are substantial or potentially substantial enough to meet or exceed significance criteria. Adverse effects, however, may be minor or insubstantial, and therefore not significant.

OC.31-11 It is believed that this Final EIR/S, incorporating comments such as these as appropriate, meets the requirements of CEQA and NEPA.

SET # OC.32 RESIDENTS OF BORDER TOWN

OC.32-0 Section C.8.3.7, Table C.8-1, and Part D of the Final EIR/S have been revised to include the Border Town residents along Alternative Segment WCFG. Based on the visual and land use impacts that the Proposed Project would impose on these subject residents, Proposed Segment W has been deemed to be environmentally superior to Alternative Segment WCFG.

OC.32-1 Please see response to comment GP.25-1.

OC.32-2 See response to comment GP.8-2 and GP.52-2. The use of H-frame structures is still common and acceptable industry practice.

OC.32-3 The commenter is correct in identifying the substantial visual impact to be experienced by the westward facing residents at Border Town. The Draft EIR/S visual section contained an error in Angle Point notation: WNØ5-WNØ8 should be WNØ6-WNØ10. Appropriate sections in the Executive Summary, Section C.13, and Part D have been revised accordingly in the Final EIR/S.

OC.32-4 The suggested alternatives have been considered in the Final EIR/S, with documentation presented in revised Sections C.x.3.7 and Part D.

OC.32-5 Comment noted. See responses to comment GP.25-1 regarding property owner notification. Sections C.7.2.2, C.8.2.2, and C.13.2.2 of the Final EIR/S discuss the impacts of the Proposed Project on ground water, land use, and visual resources, respectively. Response to comment GP.6-1 summarizes the construction and operation impacts of the Proposed Project. Response to comment GP.2-2 addresses property value impacts. A discussion of the electric and magnetic field impacts of the Proposed Project is included in responses to comments GP.8-2 and GP.52-2. Response to comment OC.32-24 addresses the safety implications of a transmission line located within proximity to propane tanks. As discussed in Section C.9.2.3 of the EIR/S, corona noise levels during wet weather would be insignificant (Class III). Section C.10.2.3.2 concludes that the Proposed Project could create radio and television interference during foul weather for residences located closer than 1,000 feet from the line.

OC.32-6 See responses to comments GP.8-2 and GP.52-2. There are no known efforts of electric and magnetic fields on ground or surface water.

OC.32-7 See responses to comments GP.2-2 and A.1-6 and revised Mitigation Measure S-1. The WCFG proposed alignment is more likely to have an adverse impact on property value than the Proposed Project. Combining the proposed corridor alignment and the Alternative Border Town Substation site (SPPCo Property) would result in the least potential property value impact for the cited parcels.

OC.32-8 See response to comment OC.32-3.

OC.32-9 Comment noted. See response to comment OC.32-5.

OC.32-10 Comment noted. See response to comment OC.32-5.

OC.32-11 See response to comment GP.25-1.

OC.32-12 Two route alternatives within the subject area have been considered in the EIR/S (the Proposed Segment W and Alternative Segment WCFG). In addition, the alternatives suggested by the Border Town residents have been considered in the Final EIR/S (see response to comment OC.32-4).

Furthermore, as discussed in response to comment GP.30-1, numerous alternatives to routing in the subject area were considered in the Draft EIR/S, including various transmission alternatives for bringing power into the Reno area from the east (see Section B.3.4.6.2), generation alternatives (Section B.3.4.3), system enhancement alternatives (Section B.3.4.4), and an alternative route that would terminate at North Valley Road Substation after an approach from the north (Eastside Route 2, see Section B.3.4.2). Further consideration has been given to the Nevada Route Alternative, Eastside Route 2, and alternatives to the Border Town substation site in the Final EIR/S. None of these alternatives are considered to be superior to Segments W, WCFG, and the Border Town residents alternatives, with the proposed Border Town Substation site.

OC.32-13 See response to comment GP.52-3

OC.32-14 See response to comment GP.52-3. Section B.3.4.6 of the EIR/S discusses an alternative to the project utilizing lower voltages.

OC.32-15 Sections A.6.3.3 (Proposed Project Design) and B.3.4.2 (North Valley Road Substation Expansion Alternative) discuss the need for and optimum location of the proposed phase shifter.

OC.32-16 See responses to comments GP.8-2 and GP.52-2.

OC.32-17 Section C.10.2.2.7 of the EIR/S addresses the impacts of conductive objects near transmission lines and proposes mitigation measures.

OC.32-18 There are no known effects of EMF on ground water.

OC.32-19 See response to comment OC.32-3.

OC.32-20 See response to comment OC.32-7.

OC.32-21 Comment noted. See response to comment OC.32-5.

OC.32-22 Comment noted. See response to comment OC.32-5.

OC.32-23 Comment noted. See response to comment OC.32-5.

OC.32-24 Comment noted. See response to comment OC.32-5. The possible electric induction effects due to the proximity of the power lines to propane facilities was addressed in Section C.10.2.3.3 of the EIR and Mitigation Measure P-1 was proposed. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the

Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

SET # OC.33 SPORTS HUT

OC.33-1 Offsite mitigation proposed in the document is based on the assumption that the selected area would be enhanced by managing it for specific habitat objectives. The enhanced habitat would therefore "yield" additional habitat value which would compensate for the lost habitat value. Restoration of affected areas would also reduce long-term habitat loss. No cumulative loss is anticipated since offsite compensation will involve raising the baseline habitat value of the selected area and would not require conversion of habitat.

SET # OC.34 SAVE LONG VALLEY COALITION

OC.34-1 See responses to comments GP.6-1 and OC.20-1.

H.3 RESPONSES TO COMMENTS FROM ELECTED OFFICIALS (EO)

SET # EO.1 U.S. CONGRESSMEN WALLY HERGER AND JOHN DOLITTLE

EO.1-1 Comment noted.

H.4 RESPONSES TO COMMENTS FROM PUBLIC AGENCIES (PA)

SET # PA.1 U.S. DEPARTMENT OF AGRICULTURE, NATURAL RESOURCES CONSERVATION SERVICE

PA.1-1 The Evans Creek Watershed Project has been added to the cumulative project list and cumulative impact analysis in each issue area (Sections C.x.2.3) in the Final EIR/S.

SET # PA.2 COUNTY OF MODOC, ROAD DEPARTMENT AND PUBLIC WORKS DEPT.

PA.2-1 Modoc County Road 138 has been added to Table C.12-1 in the Final EIR/S as suggested.

PA.2-2 The Applicant shall obtain encroachment permits well in advance of construction from Modoc County for any location at which the transmission line would cross a County road, any other location that construction activities would occur within or require the use of County road ROW, or any location where a new access road would intersect with a County road.

PA.2-3 The potential impacts of physical damage to public roadways that would be used for construction access by heavy trucks and equipment is considered to be significant, but mitigable (Class II) impacts. Although the Applicant has indicated that damaged roadways would be restored, Mitigation

Measure T-1 has been modified in the Final EIR/S to require the restoration of roadways disturbed by construction and maintenance activities.

PA.2-4 The referenced text has been revised in the Final EIR/S as suggested.

PA.2-5 See response to comment PA.2-3. The recommended road maintenance program, when prepared for County Road 73, shall be specifically written to require the applicant to be responsible for preventive maintenance, such as watering and blading, and for ultimately repairing damage to the road, including the effects of washboarding.

SET # PA.3 STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION

PA.3-1 We have no records of a greater sandhill crane nest at MP-54.8, although a pair of cranes was observed several miles north of that location during field surveys conducted in 1994 in the vicinity of the town of Madeline. The Tuscarora pipeline is parallel to the Alturas transmission line at this point and, according to CDFG Region I, there are no crane nesting records or construction restrictions in this area. The CDFG Region I office was contacted on this issue and Bob Williams confirmed that there are no records of this species in the vicinity of MP-54 in their files (Williams, 1995). However, greater sandhill cranes were observed during 1994 field surveys in the vicinity of the town of Madeline, approximately 12 miles north of MP-54.8.

PA.3-2 The Proposed Project area south of Hallelujah Junction does not cross the deer migration corridor identified by the CDFG. Please see new Table C.3-6a in the Final EIR/S for a complete listing of all big game habitats and related construction constraints by milepost.

SET # PA.4 STATE OF CALIFORNIA, ENVIRONMENTAL PROTECTION AGENCY, LAHONTAN REGION WATER QUALITY CONTROL BOARD

PA.4-1 Please see Table C.3-5 in the Final EIR/S, which lists the locations and characteristics of all of the jurisdictional wetlands delineated in the project area. Routine wetland delineations were conducted for all potential jurisdictional wetlands in the project study area. However, it should be noted that a "comprehensive delineation" is a specific level of investigation that is beyond the scope of this EIR/S. The U.S. Army Corps of Engineers 1987 Wetland Delineation Manual specifies that routine delineations are appropriate for delineation of wetlands except when the project area contains complex wetland-upland boundaries that cannot be readily discerned using the routine method. The routine delineation method is appropriate for this project based on the relative simplicity of wetland-upland boundaries and the level of detail required for assessment of wetland impacts in a project area of this size.

But, more detailed investigations may result from the Section 404 permitting process. A Soil Conservation and Erosion Control Community Habitat and Restoration Plan for impacts to wetlands and other plant communities is under preparation and will be submitted for review and approval prior to construction (see response to comment PA.23-1).

PA.4-2 Mitigation Measure G-11, as well as several biological mitigation measures in Section C.3.2.2.2, will ensure that any impacts to 100-year flood plains will be reduced to levels of insignificance.

PA.4-3 The referenced text has been changed in the Final EIR/S as suggested to more accurately state the agency responsibilities. Also, the State Water Resources Control Board (SWRCB) has been included, along with the Regional Water Quality Control Board, in the list of responsible agencies for Mitigation Measure H-6 in Table C.7-3 and in the Mitigation Monitoring Program in Part F.

PA.4-4 Specific details of cooperative restoration measures between the Tuscarora Pipeline and the Alturas Transmission Line Project have not yet been developed because all routes and facility locations have not been finalized. However, these agreements and specific measures will be in place prior to beginning construction and will be included as part of the Soil Conservation and Erosion Control Plan required by Mitigation Measure G-11 (Section C.6.2.2.2 of the EIR/S).

Wherever possible, SPPCo would use the transportation corridors and staging areas used during construction of the Tuscarora Pipeline Project. SPPCo would be responsible for mitigating any impacts due to overland travel on the Tuscarora ROW, based on specifications identified in the Tuscarora FEIR/EIS.

Stipulation has been made in Mitigation Measure G-11 that cooperative measures between the Tuscarora Pipeline and the Alturas Transmission Line Project would be included as part of the Soil Conservation and Erosion Control Plan.

PA.4-5 Appendix E.3 contains the objectives and general guidelines that will be included in the Community and Habitat Restoration Plan. The appendix describes the purpose of habitat restoration, the types of habitats requiring restoration, how revegetation will occur, the implementation schedule, inspection schedule and procedures, maintenance procedures, criteria to be used in assessing restoration success, and contingency plans in case of failure. The Applicant is preparing a detailed Community and Habitat Restoration Plan, the specific details of which shall be negotiated between the responsible agencies. A final Plan shall be submitted to the agencies for approval prior to construction.

SET # PA.5 SIERRA COUNTY, DEPARTMENT OF PLANNING AND BUILDING INSPECTION

PA.5-1 Please see responses to comments OC.28-17, 18, and 19.

PA.5-2 See response to comment GP.30-1.

PA.5-3 See responses to comments GP.1-3 and GP.14-11 for a complete discussion of the Nevada Alternative. Response to comment OC.28-14 addresses alternatives considered on the east side of the Petersen Range.

PA.5-4 Comment noted. See response to comment PA.5-3.

PA.5-5 Comment noted. See responses to comments OC.28-17, -18, and -19 for a complete discussion of Border Town Substation alternatives. Section B.2.2.3 of the Draft EIR/S describes the proposed Border Town Substation. See revised Section E.3.3 of Final EIR/S for a complete discussion of growth inducement impacts.

PA.5-6 Comment noted. See response to comment GP.30-1.

PA.5-7 See expanded policy consistency analysis, Section C.8.2.3, of the EIR/S. The EIR/S does recognize county land use plans in Sections C.8.1 and C.8.2. However, the CPUC asserts that local jurisdictions in California do not have permit authority over the Proposed Project as they are pre-empted by the CPUC. Also, see response to comment GP.135-5 regarding consistency of the Proposed Project with federal, state, and local plans, regulations, provisions, and policies.

PA.5-8 Visual impacts are thoroughly addressed in Section C.13.2 of the EIR/S. Impacts to land uses are addressed in Section C.8.2 of the EIR/S. Land use impacts were found to be significant for the Proposed Project. Also, see response to comment PA.5-7.

PA.5-9 See responses to comments GP.1-3, GP.14-11, GP.30-1 and OC.31-3. It was concluded that the potential land use impacts of the Nevada Alternative were more severe than the Proposed Project because of the much greater population that would be affected.

PA.5-10 The EIR/S presents the results of the scoping and alternatives identification, screening, and assessment processes as they were applied in the evaluation of Sierra Pacific Power Company's (SPPCo's) applications to the CPUC and BLM for the proposed Alturas Transmission Line Project. Based on the major objectives of the project, a wide variety of alternatives that could potentially fulfill those objectives were identified and considered in the alternatives screening process, as described in Section B.3.2 of the EIR/S, without the limitations of the boundaries of a specific study area. For example, various transmission, generation, and technology alternatives were considered that would not necessarily involve the general area between Alturas and Reno, including Long Valley. The identification and screening process involved consideration of SPPCo's application and Preliminary Environmental Assessment (which was deemed complete by the Lead Agencies before the scoping process for the EIR/S was initiated), numerous comments from public agencies and the general public, and scoping comments and suggestions brought forward from a wide variety of resource specialists within the Lead Agencies and the EIR/S preparation team. Key screening criteria included technical feasibility and potential environmental impacts and opportunity to avoid impact across all of the environmental issue areas considered in the EIR/S (air, biological resources, cultural resources, etc.).

Numerous alternatives to routing in the Long Valley area and the Border Town Substation were considered in the EIR/S, including various transmission alternatives for bringing power into Reno from the east (see Section B.3.4.6.2), generation alternatives (Section B.3.4.3), system enhancement alternatives (Section B.3.4.4), and an alternative route that would terminate at an expanded North Valley

Road Substation (Section B.3.4.2) after an approach from the north (Eastside Route 2, Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative, Eastside Route 2, and alternatives to the Border Town Substation site, with this clarification presented in the Final EIR/S, including additional information on the independent consideration of the North Valley Road site as an alternative to Border Town. Still, none of these alternatives are considered to offer substantial potential for impact reduction relative to the proposed route and substation site.

PA.5-11 As presented in Section B.3.4.6.2 in the Final EIR/S, the 120 kV and 345 kV Tracy-Silver Lake Substation Alternatives were considered collectively with the Midpoint-Valmy Alternatives, since the combined alternatives could reasonably satisfy the Proposed Project objectives. Since these Tracy-Silver Lake Alternatives would need to traverse northern Sparks and Reno, they were eliminated from further consideration because they did not reduce or eliminate the environmental impacts of the Proposed Project (see Section B.3.2 for a description of CEQA/NEPA alternative screening methodology).

PA.5-12 In Section B.3.4.6.2 of the Final EIR/S the reader is referred to the discussion of the environmental impacts of the east-west segment of the Nevada Route Alternative since the impacts of the Tracy-Silver Lake Alternatives would be similar; both traversing the urban environment of northern Sparks and Reno.

PA.5-13 Response to comment PA.5-10 provides a discussion of alternatives considered. See revisions to Section B.3.4.2 regarding an expanded assessment of alternative Border Town Substation sites, including expansion of the North Valley Road Substation. It is noted that many of the alternative alignments considered would route the project away from Long Valley, necessitating a substation in another location. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications. See responses to comments OC.28-1 and OC.28-5 for a discussion of CC&R restrictions.

PA.5-14 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

PA.5-15 See responses to comments GP.30-1, OC.30-5, PA.5-10, and PA.5-13. Section B.3.2 of the Draft EIR/s describes the CEQA alternative screening methodology applied. The "two-prong" approach is repeated at the introduction of Section B.3.4. Tables A-8 and B-12 present matrices comparing alternatives to the project objectives. Sections B.3.4.3, B.3.4.4, B.3.3.4.5, and B.3.4.6 discuss to what extent various transmission, generation, system enhancement, and alternative technology alternatives satisfy the project objectives. Section B.3.4.6.2 of the Final EIR/S discuss the environmental impacts of the Transmission Alternatives identified as being able to satisfy the project objectives.

SET # PA.6 CITY OF SPARKS, PLANNING DEPARTMENT

PA.6-1 Comment noted. Section B.3.4.6.2 of the Final EIR/S has been expanded to included the additional information provided by the commenter.

PA.6-2 Comment noted.

PA.6-3 Comment noted. Section B.3.4.6.2 of the Final EIR/S has been expanded to included the additional information provided by the commenter.

SET # PA.7 U.S. DEPARTMENT OF AGRICULTURE, FOREST SERVICE, MODOC NATIONAL FOREST

PA.7-1 The discussion of the USFS Alturas Alignment has been expanded in Section B.3.4.1 of the Final EIR/S to include a more thorough analysis of the environmental impacts of the suggested alternative. A comparison of the USFS Alturas Alignment to Proposed Segment A and Alternative Segment B is also provided, by issue area. Section E.3.3 of the Final EIR/S has been expanded to include a discussion of the utility corridor ramifications of the Proposed Project.

PA.7-2 Please see responses to comments GP.30-1 and GP.41-33.

PA.7-3 See responses to comments GP.41-7 and PA.7-1.

PA.7-4 Given the orientation of the Devils Garden Site, the substation bus work would have to make a 90-degree turn, thus requiring more space; with the Mill Site, the substation bus could proceed north to south.

PA.7-5 Comment is noted. The Final EIR/S has been revised to note that the Modoc National Forest also has fire protection responsibility along the corridor.

PA.7-6 The screening analysis of the Tuscarora Natural Gas Pipeline includes a discussion of the system safety issues associated with a transmission line and pipeline in a joint utility corridor. As noted, these system safety issues could be mitigated through the use of thicker pipe coatings, installation of shielding and corrosion protection systems, or placing ground shields underneath structures. The elimination of this alternative was based primarily on visual impacts. Also, see response to comment A.1-20.

PA.7-7 The Devils Garden wild horse herd uses portions of the Devils Garden area in the vicinity of the Alturas substation and the northern terminus of Segment A. Also, Table C.3-14 has been revised to include prairie falcons.

PA.7-8 None of the special status plant species observed on Segment A were found on the National Forest. Lilliput lupine (*Lupinus uncialis*) was first recorded in California in 1993, but is now known to occur from a number of locations in Modoc County.

PA.7-9 George Studinski of the Modoc National Forest indicated that he observed a pair of golden eagles nesting in the vicinity of Segment A. The location given is adjacent to the Devils Garden Road. This location is more than 0.25 mile from the proposed transmission line. Preconstruction surveys specified in Mitigation Measure B-14 and additional restrictions identified in Mitigation Measure B-15 have been established to protect breeding raptors and other wildlife resources in the project vicinity. Compliance with these conditions will be monitored by qualified biologists. See also the last two paragraphs of response to comment GP.75-1.

PA.7-10 The comment regarding the preliminary nature of the recommendations provided in the inventory report is noted. The Class III inventory report is being finalized pursuant to agency directives received following their meeting in July 1995. It is anticipated that the report will be submitted to the California and Nevada SHPOs in December 1995.

The comment regarding the southern extent of the Modoc ethnographic territory is noted. This modification to the baseline conditions does not change the impacts analysis.

The evaluation status of sites falling within Modoc NF lands has been revised to "unevaluated" to conform with Modoc NF policy. These sites will be recommended for subsequent treatment (subsurface testing, obsidian sourcing, and hydration analyses) in the Historic Properties Treatment Plan assuming SHPO concurrence with the findings in the inventory report.

PA.7-11 Please see Appendix E.5 for a complete discussion of habitat loss related to access routes. Appendix E.5 also contains a revised comparison of the total impacts associated with Proposed Segment A and Alternative Segment B based on the findings of the access road surveys conducted in Spring 1995.

PA.7-12 Mule deer winter habitat loss in the ROW and associated with access roads in Segment A would occur at structure locations and in areas where blading of access roads is required. This loss would represent approximately 10.2 acres. Please see revisions to Table C.3-12 where this acreage amount formerly read 1.02 acres of habitat loss. Please see Appendix E.5 of this document for a complete discussion of habitat loss related to access routes.

PA.7-13 The avoidance period for golden eagle and prairie falcon provided in the Final EIR/S were specified by the California Department of Fish and Game.

PA.7-14 Table C.8-2 has been revised in the Final EIR/S to include the Modoc National Forest grazing allotment.

PA.7-15 The referenced text has been changed in the Final EIR/S.

PA.7-16 The text regarding impacts on grazing was misplaced. Please see revisions in the Final EIR/S. Also, see revised text in Section C.8.2.3.1 regarding project consistency with the Modoc National Forest Land & Resource Management Plan.

Also, see response to comment GP.135-5.

PA.7-17 Table C.13-9 has been revised to include the U.S. Forest Service. No checks have been marked in the USFS column because the Proposed Project is consistent with the established Visual Quality Objectives of Partial Retention and Modification as described in Section C.13.1.2.2.

Mitigation Measure V-5 has been revised to include the requirement for 70-foot structures between Milepost MP-1 and Angle Point HSØ1.

PA.7-18 Although there are existing structures in the vicinity of the Mill Site Alternative Substation Site, existing views are still expansive and relatively unobstructed as demonstrated in the photograph presented as Figure C.13-22A. Construction of the substation at the alternative site would obstruct views to the south and west as viewed from Hwy 299 and would conflict with the existing pastoral nature of the existing landscape. Although the site is currently zoned for commercial and industrial development, the substation would be a prominent middle ground feature and a significant visual impact would occur (see photosimulation presented as Figure C.13-22B).

PA.7-19 Table D.2-1 has been reviewed and revised in the Final EIR/S to be consistent with the impact analyses presented in the document.

PA.7-20 See revised Section C.8.3.1 of the Final EIR/S which clarifies the Alternative Segment B impacts with regards to the *informal* golf course. Since Alternative Segment B would not cross a *formally* designated golf course driving range, it would not have a greater impact on recreational uses than the Proposed Project.

PA.7-21 Correction noted.

PA.7-22 Comment noted. Table B-4 identifies the general location of proposed access routes and indicates if access improvements are temporary or permanent. The revised base maps, provided in the back of Volume I of the Final EIR/S, illustrate the exact alignment of proposed access routes. Appendices E.5 and I.1 of the Final EIR/S include impact analyses of biological and cultural resources, respectively, along the proposed access routes.

The number and location of crane hillside landings presented in Table B-5 is an estimate only as provided by SPPCo, and is contingent upon final structure spotting during preconstruction flagging (see footnote to Table B-4).

PA.7-23 The alternative routing requested in this comment has been added as Mitigation Measure B-22 in EIR/S; (see Section C.3.2.2.3).

PA.7-24 The appeal process is part of the decision process and will be explained as part of the BLM's Record of Decision (the decision document on the project), and the USFS Record of Decision for portions of the transmission line crossing National Forest System Lands.

PA.7-25 Comment noted. Part F of the Final EIR/S has been revised to include USFS involvement in implementing the Mitigation Monitoring, Compliance, and Reporting Plan on National Forest System Lands.

SET # PA.8 COUNTY OF LASSEN, BOARD OF SUPERVISORS

PA.8-1,2 Comments noted. Further consideration has been given to the subject alternatives comparisons; the results are documented in a revised Part D of the Final EIR/S. As concluded in Part D, Proposed Segment L is deemed environmentally superior to Alternative Segment ESVA because of the significant biological and cultural resources along the ESVA alignment. In addition, Proposed Segment T is deemed environmentally superior to Alternative Segments S and U, although Segments S and U are preferred by BLM.

PA.8-3 Section 2.2.1 of the Executive Summary identifies the alternative route alignments considered in the EIR/S for the Proposed Project. For each alternative, the text states the rationale as to why that alternative was considered. In the case of Alternative Segment M, there was evidence to believe this alternative would have fewer cultural resource impacts than Proposed Segment N. However, field surveys subsequently revealed, as discussed in Section 4.3.2, that Alternative Segment M would in fact have two potentially significant cultural resource impacts whereas Proposed Segment N would have none.

PA.8-4 The Draft EIR/S identified Wendel Road (County Road 320) as a scenic corridor based on information contained in the Lassen County General Plan Energy Element. We now understand that information provided by the County to the Consultant preparing the Energy Element was out of date, leading to the incorrect identification of Wendel Road as a County Designated Scenic Corridor in the Energy Element. Therefore, the Final EIR/S has been revised to delete references to Wendel Road as a County-designated Scenic Corridor.

The significance designation is primarily based on the Proposed Project's visual prominence as a foreground and middleground feature and the resulting visual contrast and degradation of scenic quality. Further, Proposed Project Segments N and O are still considered inconsistent with the Lassen County Wendel Area Plan, Environmental Natural Resources Policy No. 5-C, which promotes the retention of scenic values. Therefore, the significance designation would not change.

This portion of the route has relatively little visual access, therefore, helicopter construction would not minimize the visual impact.

PA.8-5 The staging areas are expected to generate a maximum of 62 automobile trips per day for the workers' vehicles, 23 crew trucks or vans shuttling workers between the staging area and the work

site, and 20 to 30 truck trips per day for hauling construction equipment and materials (volumes represent round trips). The impacts would be adverse, but not significant from the perspective of traffic operations and congestion; however, there may be some physical impacts to the roadway associated with the use of heavy trucks. Although the weight of the trucks cannot be determined at this time, it is possible that there may be some truck-related roadway damage even though the truck weights would be below the legal limit for use on public highways. See response to comment PA.2-3 for additional clarification regarding the applicant's requirement to restore all roadways to their original condition if damage occurs. The costs of the repairs cannot be determined because the extent of the potential damage cannot be predicted; however, the applicant would be responsible for the repair/restoration costs.

As discussed in Section B.2.3.5, the Lassen County staging areas for the proposed Alturas Transmission Line Project are also proposed for use by Tuscarora Pipeline Company for their pipeline construction activities. The environmental impact analysis of these staging areas was included in the Tuscarora Pipeline EIR/S. Since Tuscarora Pipeline construction is to commence prior to the Alturas Transmission Line, these staging areas were chosen because they would be existing, disturbed sites. The staging areas would be utilized for equipment and vehicle storage, and structure sub-assemblies. No permanent structures would be erected at the staging area sites. Restoration of the staging areas to pre-project conditions will be completed in accordance with the restoration plans for the Tuscarora Pipeline and Proposed Project.

PA.8-6 Please see response to comment PA.8-14.

PA.8-7 The subject text has been clarified in the Final EIR/S.

PA.8-8 The subject text has been clarified in the Final EIR/S.

PA.8-9 Revisions have been made in the Final EIR/S based on the comments pertaining to the Lassen County Plans. The comment regarding Lassen County review and approval of mitigation measures for resource impacts is noted.

PA.8-10 The referenced text has been clarified in the Final EIR/S.

PA.8-11 Please see response to comment GP.61-1. See response to comment GP.132-4 regarding impacts to property values.

PA.8-12 The referenced text has been corrected in the Final EIR/S.

PA.8-13 The impact of helicopter noise near staging areas is discussed in response to comment PA.8-14.

PA.8-14 Use of helicopters for transporting towers and stringing wires in rough terrain is described in Part B, Project Description. A third use for helicopters, is presented in Table B-7 (Line Maintenance) in Section B.2.4.2 (Maintenance of Project Facilities) which states: "Two patrols per year: one ground

patrol (vehicle and foot) and one air patrol." The air patrol would use a helicopter (D. Stikkers, SPPCo, pers. comm., 6/21/95). The once a year fly-by would produce noise at a level and duration similar to that from a medivac helicopter. Noise level data are summarized in Appendix G. The discussion of noise impacts from helicopters during construction and operations has been expanded in Section C.9.2.3 of the Final EIR/S.

PA.8-15 The CPUC, along with the BLM, is responsible for coordinating and implementing a mitigation monitoring program. Local agencies participation in the mitigation monitoring program is encouraged, however, where this participation exceeds existing county permit programs, the counties must arrange reimbursement agreements with the Applicant, if necessary. Please note that affected cities do retain jurisdiction over all non-discretionary or ministerial permits and the Applicant is still required to obtain all relevant local permits or approvals.

SET # PA.9 WASHOE COUNTY, DEPARTMENT OF COMPREHENSIVE PLANNING

PA.9-1 Please see responses to comments GP.10-1 and PA.1-1.

PA.9-2 Comment noted. The biological resources of Peavine Peak traversed by the Proposed Project study corridor are discussed in Section C.3 of the EIR and illustrated on the base maps included at the end of Volume I. See response to comment GP.25-2 for a discussion of visual impacts.

PA.9-3 Section C.8.2.2 of the Final EIR/S has been revised to include a discussion of the Proposed Project land use impacts on Rancho San Rafael Park.

PA.9-4 Section C.8.2.2 of the Final EIR/S has been revised to include a discussion of the Proposed Project land use impacts on the Peavine Peak area.

PA.9-5 The CPUC does not have the authority to require utility companies to underground their existing electric power lines as mitigation for the Proposed Project. However, the Commission Advisory and Compliance Division is currently evaluating whether requiring undergrounding of other lines is an appropriate mitigation measure. See response to comment GP.10-1.

SET # PA.10 STATE OF NEVADA, COMMISSION ON ECONOMIC DEVELOPMENT

PA.10-1 Comment noted.

SET # PA.11 STATE OF NEVADA, DEPARTMENT OF TRANSPORTATION

PA.11-1 The Applicant shall be required to obtain an occupancy permit for any work conducted within the State's ROW. This is not considered as a mitigation measure because it would be required regardless of whether this EIR/S were prepared or if a significant impact were identified.

PA.11-2 The Applicant shall be required to prepare a construction staging plan for review and approval by the Nevada Department of Transportation prior to any construction within the State's ROW. This is not considered as a mitigation measure because it would be required regardless of whether this EIR/S were prepared or if a significant impact were identified.

PA.11-3 The Applicant shall be required to prepare a traffic control plan for review and approval by the Nevada Department of Transportation prior to any construction within the State's ROW. This is not considered as a mitigation measure because it would be required regardless of whether this EIR/S were prepared or if a significant impact were identified.

SET # PA.12 STATE OF NEVADA, DIVISION OF WATER RESOURCES

PA.12-1 For the Proposed Project alignment within the State of Nevada, it is not likely that project construction activities will be below ground water level. However, if any such cases become present, a waiver will be requested from the Nevada State Engineer as stated in Section C.7.1.3 of the EIR/S.

SET # PA.13 U.S. DEPARTMENT OF THE INTERIOR, FISH AND WILDLIFE SERVICE

PA.13-1 Please see response to comment PA.23-5.

PA.13-2 See response to comment PA.23-5.

PA.13-3 Please refer to the response to comment PA.23-34 for locations and area of wetlands affected by the Proposed Project. The wetland types cited in the comment are found in the project vicinity, but montane meadow, silver sagebrush basins, and riparian scrub are the only wetland types that would be potentially affected by the Proposed Project. General mitigation for impacts to wetlands is described in Mitigation Measures B-1 and B-4. Specific guidelines for mitigation implementation will be detailed in the Soil Conservation and Erosion Control Plan to be prepared and submitted for responsible agency review prior to construction.

PA.13-4 The text of the Final EIR/S has been changed as suggested regarding the status of bald eagle.

The USFWS has received and reviewed the Appendix E.1 Biological Assessment of the Draft EIR/S. A letter will be issued which states concurrence or no concurrence with no effect statements in the assessment. Mr. Pete Lickwar at the Ecological Services Division will coordinate this effort.

PA.13-5 Stream buffer zones would be no less than 200 feet from edge of channel. See revisions to Mitigation Measure B-6.

PA.13-6 Loss of any individual birds which are protected under the Migratory Bird Treaty Act, the Bald Eagle Protection Act, or the State or Federal Endangered Species Act would be a significant impact.

The Migratory Bird Treaty Act protects such species as red-tailed hawk and Swainson's hawk, as well as waterfowl species.

PA.13-7 The habitat yield ratios represent the average ratio of existing habitat value of the affected habitat to potential gain in offsite habitat value that could be achieved through enhancement. For example, if the affected parcel of land has a relative habitat value of 3 and the land to be acquired has the potential to be enhanced from a habitat value of 3 to a habitat value of 4, then the yield ratio would be 3:1 because each parcel acquired is contributing only 1/3 of the value of the parcel impacted. The habitat yield ratio takes into account the existing habitat condition of the affected land relative to the land being acquired as compensation. Since the actual areas that would be acquired as mitigation are not known at this time, the habitat yield ratio represents the estimated potential for enhancement based on regional observations of plant communities and special status species habitats. More precise yield ratios may be specified in the final Community and Habitat Restoration Plan to be approved by the responsible agencies (see response to comment PA.23-1).

A conservative habitat yield ratio of 5 was selected for permanent overland access corridors to help account for the additional unquantified indirect impacts to adjacent resources that would occur during construction and over the life of the project along these access routes.

Consultation with BLM led to acceptance of 15 years as the appropriate period of impact for the general area of the Proposed Project. This is the value being applied to similar projects in the vicinity.

PA.13-8 Success criteria for five years will be described in the Community and Habitat Restoration Plan to be submitted for review and approval to the responsible agencies prior to construction (see response to comment PA.4-5). These criteria will cover aspects such as percent cover, height of plant, density, and composition of the plant community. If the criteria are met after the five-year period, mitigation is determined to be effective. Achievement of the success criteria is considered indicative of a very high potential for successful, long-term recovery.

Five years is a widely used period for monitoring restoration of natural plant communities in California. The actual period required for complete recovery may be longer or shorter, but there is insufficient data to support development of community-specific monitoring periods. The existing mitigation measures give the responsible agencies the discretion to determine when monitoring is no longer required or to extend the monitoring period if necessary.

PA.13-9 USFWS has been added to the list of agencies who will receive copies of the Soil Conservation and Erosion Control Plan.

PA.13-10 Please see Mitigation Measure B-14 which includes preconstruction surveys for current-year nesting raptors. Preconstruction wildlife surveys would include the following species.

Nest Surveys
Greater sandhill crane
Swainson's hawk
Red-tailed hawk
Golden eagle
Prairie falcon
Peregrine falcon
Loggerhead shrike
Burrowing owl
Bank swallow
Yellow warbler

Other surveys
American badger burrow surveys
Sage grouse active lek surveys
Pygmy rabbit burrow surveys.

Survey methods would be based upon the protocol established for baseline surveys. The baseline survey methodology was established in coordination with CDFG, USFS, and BLM biologists. Surveys would be conducted during initiation of the local nesting season for birds and raptors which generally occurs between February and May. However, some late season nesting raptors such as Swainson's hawk would require surveys as late as June. Exact survey dates for each species are specified in protocol used for baseline surveys. Any changes to the survey periods would be subject to approval by appropriate agencies. In addition, agencies with local jurisdiction, including the USFS and BLM, may specify survey periods for species which occur on their lands. All preconstruction surveys and methods would be included in the Community and Habitat Restoration Plan, which would be submitted to the agencies 60 days prior to construction.

PA.13-11 Diverters will be placed on the overhead ground wires. The 15-foot spacing of the diverters is recommended in the literature (Olendorff et al., 1986). Based on studies that indicate greater effectiveness of yellow-colored markers (Beaulaurier, 1981; see Appendix E.2 of the EIR/S), it is recommended that the bird flight diverters be colored yellow. Other studies related to collision-prevention markers are reviewed in Appendix E.2 of the EIR/S.

PA.13-12 Monitoring frequency for productivity of offsite compensation lands for greater sandhill cranes, and mortality surveys for bird flight diverters will be described in detail in the Mitigation Monitoring, Compliance, and Reporting Plan to be submitted to resource agencies in sufficient time to provide for the necessary preconstruction field surveys and monitor training and for mobilization to the field.

PA.13-13 Additional details on the project impacts to wetland habitats are presented in response to comment PA.23-34.

PA.13-14 Part F of the EIR/S presents an outline for the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP). Specific compliance criteria will be developed as each mitigation plan is prepared. Part F in the Final EIR/S has been revised to clarify the roles of the Lead Agencies in the implementation of the MMCRP. In addition, the mitigation measures presented in Part C and summarized in Part F have been modified in the Final EIR/S to clarify their intent and criteria for successful implementation.

The USFWS has been included to receive copies of the mitigation plans. See response to comment PA.23-1.

SET # PA.14 U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION IX

PA.14-1 Please see response to comment GP.141-17.

PA.14-2 See response to comment GP.141-17.

PA.14-3 Due to the overhead nature of the proposed transmission line there are no long term effects upon mule deer migration as a result of the Proposed Project. Indirect impacts to big game during construction are addressed in Mitigation Measure B-13. Please see new Table C.3-5a for a complete list of big game habitats crossed (by milepost) and the construction restrictions applied in these areas. Biological monitors will be monitoring for compliance with restrictions.

PA.14-4 Comment noted. All significant impacts to jurisdictional wetlands shall be mitigated as specified in Mitigation Measures B-1 and B-4. Additional measures to protect riparian wetlands have been stipulated in Mitigation Measure B-6 in the EIR/S.

PA.14-5 Perch guards are metal spikes attached at the tops of structure poles. These spikes are not sharp and do not injure the birds; however, the birds will find it difficult to land with the spikes protruding from the only landing surface. The Applicant has had success using this method to dissuade birds from perching on structure poles in other locations.

PA.14-6 Your comment is noted and Mitigation Measure C-4 has been augmented to include incidental discovery situations.

PA.14-7 The proposed route and locations of various alternatives are generally in areas of very low population density, and routing and siting considerations generally result in the minimization of impacts to human populations. As proposed, the Alturas Transmission Line Project would be sited at least 300 feet from all sensitive receptors (residences, schools, churches, etc.), except for two locations (a residence on Segment L and an apartment complex on Segment X). Table C.8-1 lists all sensitive receptors within 2000 feet of the project centerline. As illustrated by this table, the population density within 2000 feet of the Proposed Project is sparse. For these reasons, the quantification and analysis of any potentially disproportionate impacts on minority and low-income communities is very difficult - the numbers involved are just not as analytically meaningful as in a more densely populated area. However, a discussion of this subject area is presented in Section C.14 of the Final EIR/S.

PA.14-8 Comment noted. As noted in Section B.2.2.1, to minimize project impacts avoidance of resources is proposed. In the event avoidance is not possible, the mitigation measure presented in this Final EIR/S shall be implemented.

PA.14-9 As discussed in Section C.10.2.3.3, prior to project approval, the Project Applicant will be required to submit a complete SF 299, Section 19 Hazardous Materials list, and prepare and submit for approval a Blasting Plan, Spill Prevention Plan, and a Fire Suppression and Prevention Plan. In addition, as noted in Section C.10.2.3.3, the Applicant is prohibited by law from treating or disposing of any hazardous material outside of an approved treatment or disposal site. To further enhance the potential for waste minimization and energy conservation, Mitigation Measure P-8 has been recommended in the Final EIR/S.

PA.14-10 See response to comments PA.23-5.

PA.14-11 See Table A-8 of the EIR/S.

SET # PA.15 WASHOE COUNTY SCHOOL DISTRICT

PA.15-1 Please see response to comment OC.20-1. Section C.8 discusses the compatibility of the proposed Border Town Substation with adjacent land uses.

SET # PA.16 MODOC COUNTY PLANNING DEPARTMENT

PA.16-1 No reference to percentage of federal and private lands was found on page ES-44 as noted in the comment. The first sentence of paragraph one on page ES-31 of the Draft EIR/S addresses the land crossed by the proposed **and** alternative transmission line routes, whereas the first sentence of paragraph two on page C.8-1 addresses only the land crossed by the proposed transmission line route.

PA.16-2 As discussed in Section B.2.4.1, with the proper maintenance, SPPCo expects that the operational life of the Proposed Project would be indefinite with proper design, quality materials, an aggressive maintenance program, and the dry climate. If the project were to be abandoned, impacts due to abandonment would be comparable to the impacts identified in the EIR/S for construction.

PA.16-3 Comment noted. See Section C.13 of the Final EIR/S regarding visual impacts of the proposed and alternative project routes and Part D for more details on the advantages and disadvantages of the various alternatives. The CPUC and BLM will consider the County's comments on the advantages and disadvantages of Proposed Segment A and Alternative Segment B in their decisions on the Proposed Project.

PA.16-4 Please see response to comment GP.61-1.

PA.16-5 A contingency plan for any blasting impacts will be included in the Blasting Plan required by Mitigation Measures G-8 and H-8. Generally, the preferred mitigation will be to remedy the situation, but a contingency plan shall provide for compensation to property owners and federal permittees, if appropriate.

PA.16-6 The significance of disturbance to recreational uses during project operation is based on many factors, including visual impacts. Furthermore, this impact is characterized as the degradation of the quality of the experience of recreational users as a result of changes in the character of the environment and potential interference with recreational activities.

PA.16-7 See revised land use text in the Final EIR/S regarding golf course ownership. This comment suggests that the presence of the transmission line on the undeveloped property south of the Arrowhead Golf Course, zoned residential and presently used as an informal golf driving range, would result in the preclusion of residential use of the property. Since the property could still be used for residential development, but may be less attractive for that use due to the presence of the transmission line, the issue is decrease in residential value of the property, not preclusion of residential use.

See response to comment GP.132-4 (second paragraph) regarding impacts to residential property values. Section C.8.2.2 has been modified in the Final EIR/S to clarify the discussion of impacts on the golf driving range along Alternative Segment B.

PA.16-8 The noted clarification has been incorporated into the Final EIR/S.

PA.16-9 Comment noted.

PA.16-10 The specific compensation lands (and their locations) ultimately to be required will only be determined upon implementation of the Mitigation Monitoring, Compliance, and Reporting Plan, based on the mitigation measures prescribed in the Final EIR/S, subject to adjustment depending on the success of habitat protection and restoration measures. It is anticipated that roughly 1,000 - 2,000 acres of land may be transferred project-wide. Because of the weak economy and high proportion of Modoc County lands that is in public ownership, the cumulative impact of further public acquisition is a concern in terms of impact on employment and tax base. It is not known whether the land potentially to be proposed for acquisition for habitat and wetland mitigation in Modoc County is in production for hay or livestock uses. For example, if the 259 acres estimated for Modoc County were in production of hay or grass, the land would be valued at $1,000 to $1,500 an acre, would support approximately one half of one job, and would yield annual property taxes of approximately $2,500 to $3,900. While not individually significant, the cumulative impact of multiple projects needs to be considered in light of Modoc County's employment and fiscal base. The California Department of Fish and Game (CDFG) is aware of the no net loss policy established by the Modoc County Land Use Commission and is willing to work closely with the Commission to find mutually acceptable parcels and conditions of acquisition. In general, land acquired by the CDFG is accompanied by an endowment which is used to pay the taxes associated with ownership in lieu of fees. Moreover, lands held by the State are not subject to Proposition 13. In addition, State-acquired lands which provide habitat for wildlife may help increase tourism in the Modoc area as hunting, birding, and fishing will be enhanced overall. This would result in increased local revenues.

PA.16-11 Between Angle Points AØ1 and CØ1, a limited amount of upgrading and widening of existing four-wheel drive roads and two-track roads would occur above Daggert Canyon and between Angle Points AØ6 and CØ1. In addition, a short stretch of new single lane access road would be

constructed across the Devils Garden Plateau. A short stretch of permanent access road would be constructed at the railroad crossing between Angle Points AØ4 and AØ5. These roads would be minimally visible, if at all, from the nearby travel corridors and would not warrant the additional cost of construction by helicopter.

Tree trimming and removal would also occur between Angle Points AØ1 and AØ3, AØ3 and AØ4 on the Devils Garden Plateau south rim face, and AØ6 and CØ1. Mitigation Measure V-5 addresses the requirement to maintain sufficient juniper densities along Crowder Flat Road to accomplish effective screening of the Proposed Project. Tree clearing on the Devils Garden Plateau south rim face would be required regardless of whether helicopter installation is used or not. Therefore, construction by helicopter would not minimize the visual impact.

Between Angle Points AØ6 and CØ1, the visual effects of tree trimming or clearing would be limited to occasional views of the route from County Roads 54 and 60 and back-country dirt roads (including County Road 62). The relatively limited visual access afforded this portion of the route would not warrant the increased cost of construction by helicopter.

With regard to the lowering of structure heights to reduce skylining, it is important to note that lower structure heights will result in greater numbers of structures which could negatively impact other resources, thereby offsetting any lessening of the visual impact. However, Mitigation Measure V-5 has been revised to limit structure heights to 70 feet between Milepost MP-1 and Angle Point HSØ1 (see response to comment PA.7-17) and Mitigation Measure V-8 requires the reduction of structure heights as much as possible to lessen the potential for skylining where the route crosses upper Daggert Canyon and Devils Garden Plateau. Mitigation Measure B-21 of the Final EIR/S recommends a more northerly route across the head of Rock Creek along Segment A per the recommendation of the Modoc National Forest.

The comment regarding "further study of an alternate route that spans less of the valley" is noted. Many alternatives were considered prior to the preparation of this EIR/S, but they were eliminated from further consideration because they did not offer the potential for avoiding or minimizing the environmental impacts described with the Proposed Project or alternatives that were analyzed in the DEIR/S (see Section B.3).

PA.16-12 Section E.3.3, Potential Growth-Inducing Effects, has been revised to include a discussion of the extension of fiber optic service to the Alturas area. Any future inter-connection to fiber optic service would be subject to negotiating between citizens, utilities, and SPPCo.

PA.16-13 Points 1 and 3 are covered under Mitigation Measure B-8. The results of all botanical surveys are provided in the EIR/S and in Appendix E, Sections E.1, E.5, E.6, and E.7.

PA.16-14 Comment noted. See Mitigation Measure A-1.

PA.16-15 Comment noted. The applicant should meet with representatives of affected counties to determine if it is feasible to utilize approaches that will result in the greatest allocation of sales and use tax dollars to the affected counties.

PA.16-16 It is acknowledged that moving the Proposed Project up to 2,000 feet north where the route crosses upper Daggert Canyon would likely lessen or eliminate a portion of the skylining effect that would be created by the Proposed Project as illustrated in the photosimulation provided as Figure C.13-2B (see Mitigation Measure B-22 in the Final EIR/S).

With regard to lowering structure heights, see response to comment PA.16-11, paragraph 3.

See response to comment GP.10-1, regarding the undergrounding of transmission lines. According to this analysis, underground construction of transmission lines is commonly used for lower voltage distribution lines in urban areas. High voltage underground transmission lines have markedly different technological requirements than lower voltage underground distribution lines. Underground high voltage lines require extensive cooling systems to dissipate the heat generated by the transmission of bulk electricity. Cooling systems are complex and very expensive, often employing potentially environmentally hazardous materials as coolant. The extremely high costs of large cooling systems and other special design requirements prohibits the application of underground transmission systems for long-distance electric transmission. Furthermore, during construction, the environmental impacts of an underground transmission line would be similar to those impacts of major pipeline construction. Finally, the failure of underground systems could result in the release of hazardous materials. Because of the technical complications and costs, and the potential adverse effects of undergrounding, underground construction of the Proposed Project was not considered a viable alternative and was eliminated from further consideration. See response to comment GP.10-1.

PA.16-17 See response to comment PA.16-12.

PA.16-18 Section C.8.1.4 presents the federal, state, and local plans, regulations, provisions, and policies applicable to the Proposed Project. Section C.8.2.3 addresses the consistency of the Proposed Project with these plans, regulations, provisions, and policies, including those of Modoc County. Section C.8.2.3.3 addresses consistency of the Proposed Project with the Modoc County General Plan, including the Energy Element, and finds that the Proposed Project is inconsistent with some of the policies in these plans. It is noted that, in Resolution 95-06 adopted by the Modoc County Planning Commission, Modoc County has determined that the Proposed Project does not comply with the Modoc County General Plan.

Response to comment GP.41-7 provides a complete discussion of Proposed Segment A alternatives. Mitigation Measure B-22 would minimize the visual impacts of Proposed Segment A by moving the Proposed Project up to 2,000 feet further north above Daggert Canyon.

"Critical habitat" is a legal term defined by USFWS under 50 CFR Section 402. There are no such critical habitat designations within the project ROW. Any impacts to wildlife and wildlife habitat have been mitigated to less than significant level.

PA.16-19 The CPUC and BLM will consider the County's comments on the disadvantages of Proposed Segment A and Alternative Segment B in their decisions on the Proposed Project. Also, see response to comment PA.16-18.

SET # PA.17 U.S. DEPARTMENT OF ENERGY, BONNEVILLE POWER ADMINISTRATION

PA.17-1 The proposed text changes, as presented by the commenter, have been incorporated into the Alturas Transmission Line Project Final EIR/S.

PA.17-2 Please see response to comment PA.17-1.

PA.17-3 See response to comment PA.17-1.

PA.17-4 See response to comment PA.17-1.

PA.17-5 See response to comment PA.17-1.

PA.17-6 See response to comment PA.17-1.

PA.17-7 See response to comment PA.17-1.

PA.17-8 See response to comment PA.17-1.

PA.17-9 See response to comment PA.17-1.

PA.17-10 See response to comment PA.17-1.

PA.17-11 See response to comment PA.17-1.

PA.17-12 See response to comment PA.17-1.

PA.17-13 See response to comment PA.17-1.

PA.17-14 See response to comment PA.17-1.

PA.17-15 See response to comment PA.17-1.

PA.17-16 See response to comment PA.17-1.

PA.17-17 See response to comment PA.17-1.

PA.17-18 See response to comment PA.17-1.

PA.17-19 See response to comment PA.17-1.

PA.17-20 See response to comment PA.17-1.

PA.17-21 Figure B.2-3B has been added to the Finalizing Addendum for the Alturas Transmission Line Project EIR/S to illustrate the double circuit, 230 kV H-frame structure.

PA.17-22 The proposed substation in the Alturas area has been termed the "Alturas Substation" in this EIR/S to more clearly define the locality of the substation, thus simplifying the text for the reader. SPPCo is not obligated to name the subject substation the "Alturas Substation" because of the use of that name in the EIR/S.

PA.17-23 See response to comment PA.17-22.

PA.17-24 See response to comment PA.17-22.

PA.17-25 Comment noted. The Alturas Substation is located southwest of the Warner Substation. See response to comment PA.17-1.

PA.17-26 See response to comment PA.17-1. The third sentence of the commenter's addition has been deleted since it has been determined that collocation is possible.

PA.17-27 See response to comment PA.17-1.

PA.17-28 See response to comment PA.17-1.

PA.17-29 See response to comment PA.17-1.

PA.17-30 See response to comment PA.17-1.

PA.17-31 See response to comment PA.17-1.

PA.17-32 See response to comment PA.17-1.

PA.17-33 See response to comment PA.17-1.

PA.17-34 See response to comment PA.17-22.

PA.17.35 See response to comment PA.17-22.

SET # PA.18 DEPARTMENT OF THE ARMY, SIERRA ARMY DEPOT

PA.18-1 At locations where the proposed transmission line crosses access roads to the Sierra Army Depot's (SIAD), there may be temporary blockages (intermittent closures for a period of one to three days) during construction. As required by Mitigation Measure T-2, the Applicant would be required to maintain access through or around the blocked location at all times either by keeping a lane open, by providing a detour that is acceptable to SIAD, or by scheduling the closures to occur at times when the access road is not needed (if possible). The Applicant would be responsible for physically maintaining the access road or alternate route during construction and for restoring all damaged roadways to their original condition (see response to comment PA.2-3). The costs of maintaining the access road or an alternate route would be the responsibility of the applicant (SPPCo).

SET # PA.19 WASHOE COUNTY, DEPARTMENT OF PARKS AND RECREATION

PA.19-1 Information regarding Rancho San Rafael Park has been added to Section C.8 of the Final EIR/S. The location of the park is also illustrated on the base maps at the end of Volume I.

SET # PA.20 U.S. DEPARTMENT OF AGRICULTURE, FOREST SERVICE, HUMBOLDT-TOIYABE NATIONAL FORESTS

PA.20-1 Further consideration, including consideration of the stated concerns regarding visual and open space qualities on Segments X and Y, has been given to the Eastside Route 2 alternative and is documented in revisions to Section B.1.4.1 in the Final EIR/S.

PA.20-2 Comment noted. The discussion of Border Town Substation alternatives has been expanded in Section B.3.4.2 of the Final EIR/S. Also see response to comment PA.5-13. See response to comment OC.20-1 for a discussion of accessing the Toiyabe National Forest for recreational purposes.

PA.20-3 Please see response to comment GP.10-1. To maintain the capacity of the 345 kV line, several parallel 120 kV lines would need to be constructed. Section B.3.4.5 of the Final EIR/S discusses the environmental impacts associated with constructing and operating an underground transmission line. Whether one 345 kV line or several 120 kV lines are installed in an underground system, the environmental impacts would be comparable.

PA.20-4 See responses to comments GP.1-3 and GP.14-11.

PA.20-5 See response to comment GP.10-1. Section C.8.2.2 has been revised to include a discussion of the land use impacts of the Proposed Project on Rancho San Rafael Park.

PA.20-6 USFS has been added as a reviewer in Mitigation Measure B-6.

PA.20-7 Table C.3-12 has been revised in the Final EIR/S.

PA.20-8 Section C.8.2.2 has been revised to include a discussion of the land use impacts of the Proposed Project on the Peavine Peak area.

PA.20-9 Comment noted and incorporated as appropriate in the Final EIR/S.

PA.20-10 See revisions to Section B.3.4.5 of the Final EIR/S for a discussion of the fire risks associated with an underground transmission line. For a discussion of the Proposed Project's potential conflict with fire suppression activities, see response to comment GP.109-8.

PA.20-11 Comment noted. The Toiyabe National Forest has been added in the Final EIR/S to the discussion of agencies with fire protection responsibility along the Proposed Project alignment.

PA.20-12 See response to comment PA.20-11.

PA.20-13 The Key Observation Points for the visual analysis in this EIR/S were identified by the permitting agencies and the public during the scoping period for this document. Alternative Route Segment X11-X12 would appear as a more prominent foreground feature paralleling, immediately adjacent to the unpaved road that runs left to right in the photograph presented as Figure C.13-19B. The structures would be similar in scale to the structure depicted in Figure C.13-14B.

PA.20-14 See response to comment PA.20-3.

PA.20-15 See response to comment PA.20-3.

PA.20-16 Comment noted. Please see revisions to Section B.3.4.6.2 of the Final EIR/S.

PA.20-17 The primary reason the Nevada Alternative and other transmission alternatives addressed in Section B.3.4.6.2 of the Final EIR/S were eliminated from further consideration is because of the much greater population that would be affected by constructing a major transmission line through northern Sparks and Reno, resulting in additional property owner constraints and potentially significant impacts to land use, visual resources, air quality, and EMF (see response to comment GP.21-4 and revisions to Section B.3.4.6.2).

PA.20-18 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

PA.20-19 Section A.6 has been revised to clarify the need for the Proposed Project based on existing or future system limitations (also see response to comment GP.52-3). Numerous alternatives to routing in the subject Peavine Peak area (and across Toiyabe National Forest) are considered in the EIR/S, including various transmission alternatives for bringing power in from the east (see Section B.3.4.6.2), generation alternatives (Section B.3.4.3), system enhancement alternatives (Section B.3.4.4), alternative transmission technologies (Section B.3.4.6), and an alternative route that would terminate at North Valley

Road Substation after an approach from the north (Eastside Route 2, Section B.3.4.1). Further consideration has been given to the Nevada Alternative, Eastside Route 2, and other alternatives in this Final EIR/S document. Also, see response to comment PA.5-13.

PA.20-20 See responses to comments GP.1-3, GP.10-1, GP.14-11, GP.14-17, GP.52-3, and PA.20-3.

SET # PA.21 CALIFORNIA ENERGY COMMISSION

PA.21-1 All construction activities will occur within the 660-foot corridor with the exception of the construction of three new construction access routes and the upgrade of portions of existing 4-wheel drive roads, as presented in Table B-4 and illustrated on the Base Maps included at the end of Volume I of the Final EIR/S. An impact analysis of the biological and cultural resources located along the construction access route improvements outside of the 660-foot corridor are presented in Appendices E.5 and I.1, respectively, of the Final EIR/S. Also, see response to comment PA.23-5.

PA.21-2 The draft Programmatic Agreement and the draft Mitigation Monitoring Plan can be requested from the BLM when available. Contact Mr. Peter Humm, Project Manager, Susanville BLM District Office, Eagle Lake Resource Area, 705 Hall Street, Susanville, CA 96130.

PA.21-3 See response to comment GP.141-12. As presented in Section C.11.2.2.4, the projected increase in temporary workers is so minimal that an additional mitigation measure is not warranted.

PA.21-4 The commenter is correct that both Proposed Segment N and Alternative Segment M would result in significant, unavoidable visual impact. In that context, the distinction between the two segments is somewhat relative. However, Alternative Segment M will be located closer to Wendel Road and for a longer distance than Proposed Segment N. As stated in Section C.13.3.5.2: "The closer the transmission line is to Wendel Road, the stronger the visual contrast will be with the natural and rugged-appearing ridges of the Skedaddles." The text further states that: "The more prominent the transmission line becomes in views from Wendel Road, the more diminished the scenic quality of those views." It is because of Segment M's closer proximity to Wendel Road and greater impact on views to the Skedaddles from Wendel Road that Proposed Segment N was ranked ahead of Alternative Segment M.

PA.21-5 The referenced text has been revised as suggested in the Final EIR/S.

PA.21-6 With regards to higher expectations of scenic quality in remote areas, see response to comment GP.126-1. The significance criteria presented on page C.13-26 are consistent with the methodology as described in response to comment GP.126-1.

PA.21-7 The text has been corrected in the Final EIR/S.

PA.21-8 Table D.5-1 presents a comparison of the Proposed Project with the Alternative Routes. For additional discussion of Proposed Segment N and Alternative Segment M, see response to comment PA.21-4.

PA.21-9 Figure C.13-D does not provide sufficient detail to distinguish Segment W from Segment X at Border Town. Route Map 30 of 33 shows greater detail. Proposed Route Segment X begins at Angle Point VØ5 and passes through the Border Town Substation Study Area to the Proposed Substation site and on to Angle Point XØ1.

PA.21-10 It is the dominance of Alternative Segment X-East as a foreground feature, as referenced, that results in its inconsistency with the applicable BLM VRM Class III Management prescription. As presented in Section C.13.1.2.1, VRM Class III management prescriptions state that: "Management activities may attract attention but should not dominate the view of the casual observer." Alternative Segment X-East (Angle Points X11-X12) would parallel, and be located immediately adjacent to, the unpaved road that runs left to right in the photograph presented as Figure C.13-19B. The structures would be similar in scale to the structure depicted in Figure C.13-14B.

PA.21-11 The Soil Conservation and Erosion Control Plan to be prepared prior to construction shall address the use of mulch or erosion-control matting in detail. Mulches will be used for cases other than steep slopes. For example, see Point 7 under: "Guide Stipulations of BLM Manual Handbook" in Section C.6.2.2.2 of the EIR/S concerning vertisol soils. However, the use of mulches in all revegetated areas may not be appropriate.

PA.21-12 As discussed in Section C.10.2.3.2 of the EIR/S, the Applicant would be required to submit a complete SF 299, Section 19 Hazardous Materials list prior to project approval, thus identifying the quantity of hazardous materials to be used, including methods of storage and handling.

PA.21-13 to PA.21-15 All three comments raise similar issues relative to paleontological resources and mitigations, therefore the responses are combined under this discussion.

Conversations were held with the paleontologists suggested noted by the commenter, as well as other paleontologists, and these conversations did lead to new information. For example, review of "A Catalogue of Late Quaternary Vertebrates from California; Part Two, Mammals" (Jefferson, 1991) confirms, as stated in the Draft EIR/S (Section C.6.1.5), that vertebrate fossils have been found in the deposits near Honey Lake Valley. Camel remains are reported near Amedee, presumably on the east side of the valley. Discussion with other paleontologists familiar with the area reveal that fossils have also been found in Long Valley. This indicates that indeed there may be an unappreciated resource for vertebrate fossils in the region, and the text of the Final EIR/S has been modified to reflect this.

We take exception, however, to the comment about the significance criteria described in Section C.6.2.1.3 not reflecting the criteria set out by professional paleontologists. Review of the criteria by the Society of Vertebrate Paleontologist (SVP) and the memo by a former acting director of the BLM indicates that the important elements of the proposed SVP criteria are indeed reflected in the Draft EIR/S;

although the criteria in the Draft EIR/S are more general. The only important differences are that the Draft EIR/S does not include statements about 1) evolutionary trends, or 2) that ***all*** vertebrate fossils are of significant scientific value. The first item is appropriate, but the second item seems to be a gross overstatement. The memorandum that presents this statement that **all** vertebrate fossils are significant is poorly documented; little is known about where it came from and under what context or circumstances it was offered. The memo is about 17 years old and since that time the BLM has not adopted such criteria. To elaborate on the distinction of vertebrate fossil finds, Section C.6.2.1.3 of the Final EIR/S has been modified.

We have reviewed the final draft of the SVP guidelines, and according to the criteria contained therein, it would appear that the paleontological potential of the Proposed Project would fall into Category II (Undetermined Potential) or Category III (Low Potential). For low-potential areas, the SVP guidelines do not recommend protection or salvage operations. The assignment of low potential is based the SVP criterion that fossils from the area are poorly represented by institutional collections, and because reconnaissance of the corridor did not indicate any evidence for fossils or materials likely to contain fossils. The majority of the route crosses volcanic rocks which have virtually no potential for fossils; much of the remainder of the route crosses coarse-grained alluvial fans, colluvium, and eolian deposits, deposits that rarely contain abundant fossils. The portion of the Proposed Project that actually crosses lake beds or shoreline deposits that are most likely to contain fossils is quite small, primarily in the Mud Flat and Madeline Plains areas, but also includes some small parts of Honey Lake.

Considering the above discussion, Mitigation Measure G-15 provides for a construction monitoring plan to guard against the destruction of any important fossil resources. The measure, which is generally consistent with the plan suggested by the SVP, has been revised in the Final EIR/S to provide more details to the Paleontologic Data Inventory and Sampling Plan.

PA.21-16 Please see responses to comments GP.1-3 and GP.14-11. Section C.8.2.3.2 has been expanded to include a policy consistency analysis of the Proposed Project with California Senate Bill 2431 (Garamendi Act). The discussion of growth-inducing impacts in Section E.3.3 has also been augmented to address Senate Bill 2431.

PA.21-17 See response to comment PA.21-16. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

PA.21-18 See response to comment PA.21-16 and revisions to Sections A.6.3.3 and B.3.4.2 of the Final EIR/S.

SET # PA.22 WASHOE COUNTY COMMISSION

PA.22-1 Recent information on San Rafael Park has been added to the land use analysis.

PA.22-2 Please see response to comment GP.25-2.

PA.22-3 See responses to comments GP.8-2 and GP.52-2.

PA.22-4 See response to comment GP.1-3 and GP.14-11. Numerous alternatives to routing in the subject area are considered in the EIR/S, including various transmission alternatives for bringing power in from the east, including use of the referenced LADWP corridor (see Section B.3.4.6.2); generation alternatives (Section B.3.4.3); system enhancement alternatives (Section B.3.4.4); alternative transmission technologies (Section B.3.4.5); and an alternative route that would terminate at North Valley Road Substation after an approach from the north (Eastside Route 2, Section B.3.4.1). Further consideration has been given to the Nevada Route Alternative employing the LADWP corridor, Eastside Route 2, and other alternatives in this Final EIR/S document.

PA.22-5 The detailed maps of the Proposed Route and alternative alignments are based on topographic maps prepared by the U.S. Geological Survey (USGS). The base maps are only as current as the last update by the USGS, and may not reflect all of the features now present. However, the EIR/S analysis considers all existing features. Please refer to the "Environmental Baseline and Regulatory Setting" sections in each issue area for current information.

PA.22-6 See response to comment GP.25-1.

PA.22-7 See response to comment GP.132-4 (second paragraph) regarding property values. Section C.8.2.2 has been revised to include a discussion of the Proposed Project land use impacts on Peavine Peak.

PA.22-8 See revisions to Section A.6 clarifying the need for the Proposed Project. Also see responses to comments GP.1-38 and PA.5-13.

SET # PA.23 CALIFORNIA DEPARTMENT OF FISH AND GAME

PA.23-1 The Applicant is preparing the subject mitigation plans at the direction of the Lead Agencies per the mitigation requirements specified in the EIR/S. Copies of draft submittals will be provided to CDFG, USFWS, and other appropriate agencies, and incorporation of the comments of these agencies will be required as appropriate by the Lead Agencies. The final plans will be in place in sufficient time to provide for the necessary preconstruction field surveys and monitor training and for mobilization to the field.

PA.23-2 The area of impact to plant communities and special status species habitats has been estimated based on review of the available information. The final area of offsite mitigation will be assessed based on the actual area of impact determined upon completion of project construction; this will be a requirement of the Community and Habitat Restoration Plan.

PA.23-3 The references and literature citations have been corrected.

PA.23-4 Segment N has been labeled on Figure ES-2c.

PA.23-5 The following table summarizes the estimated areas (in acres) of permanent, temporary, and non-bladed overland travel impacts for the Proposed Project. These figures do not necessarily correlate with impacts to specific vegetation/wildlife species or habitats as land may be disturbed without impacts to biological resources. Assumptions are shown in parentheses and explained in the footnotes. This table has been added to Section B.2.3.2, Project Description - Transmission Line Construction, of the Final EIR/S.

Impact	Permanent (acres)	Temporary (acres)	Non-bladed Overland Travel (acres)
Alturas Substation	10.5	7.5	0
Structure setup (730 X 0.41 acre)[a]	0	299.3	0
Structure footings (730 X 0.0013 acre)[b]	0.9	0	0
Wire setup (100 X 0.17 acre)[c]	0	17.2	0
Communication facilities (2 X 0.03 acre)[d]	0.06	0.02	0
Border Town Substation[e]	11.8	0.02	0
Border Town Staging Area	0.0	8.8	0
Permanent New Roads (29,300 ft X 15 ft)[f]	10.1	0	0
Upgrade existing roads (45,100 ft X 5 ft)[g]	0	5.2	0
Intermittent blading (274,900 ft X 15 ft)[h]	0	94.7	0
Non-bladed overland travel access[i]	0	0	113.4
TOTALS	**33.4**	**432.7**	**113.4**

[a] Based on an estimated total of 730 structures requiring an estimated average of 18,000 square feet for setup at each location. The estimated number of each structure type that would be constructed and the associated area of disturbance required for their construction are summarized below:

Structure Type	No. of Structures[1]	Est. Area of Disturbance (ft^2)
Single Pole	10	15,000
3 Pole Guyed	89	22,000
Double Pole 230kV	18	15,000
H-frame	613	17,500
Avg. Est. Area of Disturbance (weighted by no. of structures)		18,000

[b] Based on a maximum pole radius of 1.75 feet plus an estimated 1.25 feet of additional permanent impact around the base of the pole for a total radius of 3 feet (28 square feet) multiplied by two poles.

[c] Based on the estimated footprint of 7,500 square feet as described in Part B (Project Description) of the EIR/S.

[d] Based on description of the proposed construction of two communication sites outside of the substation facilities that will occupy approximately 1,200 square feet (0.03 acre) and involve the temporary disturbance of an estimated 400 square feet around the perimeter of these sites as described in Section B.2.2.4 of Project Description (Part B) of the EIR/S.

[e] Based on the total area specified by the Applicant.

[f] Based on the total length of new roads and permanent overland travel routes proposed for construction outside and inside the 660-foot study corridor as described by the Applicant (July 10, 1995). Area of impact is calculated by multiplying the length of the proposed access roads by the average width of the disturbed area (10 foot wide vehicle lane plus 5 additional feet of width for side-cast material) and converted to acres (1 acre/43,560 square feet).

[g] Based on the total length of existing roads proposed for upgrades outside and inside the 660-foot study corridor as described by the Applicant (July 10, 1995). Area of impact is calculated by multiplying the length of the proposed access roads by the average width of the disturbed area (5 additional feet of width for side-cast material) and converted to acres (1 acre/43,560 square feet).

[h] Based on the maximum potential length of intermittent blading proposed to allow overland travel inside the 660-foot study corridor as described by the Applicant (July 10, 1995). Area of impact is calculated by multiplying the length of the proposed access roads by the average width of the disturbed area (10 foot wide vehicle lane plus 5 additional feet of width for side-cast material) and converted to acres (1 acre/43,560 square feet). Actual intermittent blading impacts will be considerably less because it will only be done as necessary.

[i] Based on the summary of all overland travel presented in Table C.3-10.

The Applicant estimates that 35% of the 730 structures would be constructed on slopes greater than 5% and would potentially require crane landings for erection of the structures. The crane landings would disturb an average of 10,000 square feet immediately adjacent to the structure and are included within the estimated structure disturbance area in the table above. Additional surface disturbance associated with vehicle access to the structure site is already included in the estimates for overland travel.

Section B.2.3.2 states that approximately 100 sites would be designated for wire setup within the project ROW and each of these sites will require approximately 7500 square feet. The total area affected by wire setup would be approximately 17.2 acres (100 X 7500/43560). The total area that would be affected by structure erection would be approximately 299.3 acres (730 X 18,000/43560). The 53 acres that the Draft EIR/S states would be disturbed, but not removed, does not refer to the area of surface removal caused by structure erection or wire setup, but to the impacted area affected by non-bladed overland travel routes and other indirect impacts.

The term "surface removal" is used to indicate permanent or temporary impacts which would entirely displace an existing biological resource. All permanent impacts are treated as "surface removal" but some temporary impacts are less severe and are described as "surface disturbance."

Temporary impacts at the Alturas Substation and Border Town Substation sites were estimated based on the size of the substation footprint relative to the size of the substation property to be acquired by the Applicant. It was assumed that temporary impacts would be restricted to the perimeter of the permanent substation footprint, plus landscaping, and would approximately equal the difference in area between the substation property and the substation footprint.

Table C.3-9 has been revised and updated as Table C.3-10 in the Final EIR/S.

PA.23-6 The area of habitat that will be removed by construction of new access roads is summarized in Table C.3-2 of the Final EIR/S.

Impacts associated with the construction of roads that would be used for permanent overland access (emergency or routine maintenance) have been addressed under the mitigation for permanent impacts (Mitigation Measures B-1, B-2, and B-3) and the mitigation for increased access (Mitigation Measure B-6). The area of habitat that will be removed by construction of permanent overland access routes is included in the total for surface removal under the discussion of permanent impacts. The area of habitat that will be removed by construction of new access roads is summarized in Table C.3-11 of the Final EIR/S.

Please refer to Mitigation Measure B-6 which addresses potential impacts associated with increased accessibility of the project corridor. As specified in this mitigation measure, "existing barriers to overland travel shall be replaced following construction and new barriers shall be placed at access points to non-bladed overland travel routes." Specific applications of this mitigation measure relevant to the Hallelujah Junction Wildlife Area will be addressed in the Mitigation Monitoring, Compliance, and Reporting Plan which will be submitted for responsible agency review prior to the start of construction (see the revised Part F in the Final EIR/S).

PA.23-7 Please see the revised Executive Summary text regarding sage grouse leks and brood habitat in the Madeline Plains Alternative Alignments.

PA.23-8 Pygmy rabbits were not observed during surveys of Segments J and I. In addition, there were no observations of this species documented in the vicinity of these two segments during surveys conducted for the Tuscarora Pipeline Project. However, BioSystems has documented sightings of pygmy rabbits and their burrows in the vicinity of Segment E (Milepost-38) in the Madeline Plains, within 0.1 mile of the proposed transmission line ROW, but outside the area of disturbance of the transmission line. Access roads, staging areas, and other activity areas will occur within the Tuscarora ROW in these locations. Potential impacts to pygmy rabbits in this area will be mitigated by Tuscarora prior to construction (see page 5-72 of the Tuscarora Final document). Additional pygmy rabbit habitat has been documented in the vicinity of Segment K north of Ravendale adjacent to the Tuscarora ROW, and potential impacts will be mitigated by Tuscarora (BioSystems, 1994).

PA.23-9 The East Secret Valley Alternative was not listed as the environmentally superior alternative. On page ES-13, the Draft EIR/S states that "a decision regarding environmental superiority is deferred pending spring ESVA biological surveys (May, 1995)." This survey is now complete and the results are provided in Appendix E.6 of the Final EIR/S.

Subsequent EIRs are required if substantial changes occur with respect to environmental circumstances under which the project has been undertaken, or if new information of substantial importance is identified which was not known or could not have been known during preparation of the previous EIRs including the following:

- The project will have one or more significant effects not discussed previously
- Significant effects previously examined will be substantially more severe than shown in the EIR
- Mitigation measures or alternatives previously believed to be infeasible would in fact be feasible and would substantially reduce one or more significant impacts; or

- Mitigation measures or alternatives which were not considered in the EIR would substantially lessen one or more significant impacts.

Wildlife

All of the wildlife resources identified in the Draft EIR/S as likely to occur in the ESVA study area were actually observed in the subsequent 1995 surveys of the ESVA study area. There were no additional impact categories or significant impacts identified which were not already disclosed in the Draft EIR/S for other Proposed Project segments. In addition, the type and magnitude of impacts would not be substantially more severe than what has already been disclosed in the Draft EIR/S for the Proposed Project. Thus, no new mitigation measures have been proposed which would substantially reduce one or more significant impacts to biological resources. Therefore, none of the four conditions listed above has been triggered.

Wildlife field surveys of the East Secret Valley Alignment were conducted in March, April, May, and June of 1995. The results of these survey efforts are summarized in Appendix E.6 of the Final EIR/S. Impacts include loss of big game habitat, disturbance to big game habitats, loss of Swainson's hawk foraging habitat, loss of sage grouse brood/winter habitat, and the presence of two active sage grouse leks within 0.5 mile of the ROW and one Swainson's hawk nest within 0.5 mile of the ROW.

Special Status Plants, Plant Communities, and Wetlands

ESVA surveys for rare plants, plant communities, and wetlands were conducted from May 10 to May 15, 1995 and from May 29 to June 3, 1995. These surveys identified seven special status plant species, nine plant communities, and one potential jurisdictional wetland type in the ESVA study area (see Appendix E.6). Three of the special status plant species, six of the plant communities, and the one wetland type would be significantly affected by the proposed alternative. An estimated 7.97 acres of special status plant habitat and 43.79 acres of plant communities would be temporarily removed during construction of the alternative alignment. The ESVA would permanently remove an estimated 6.86 acres of special status plant habitat, 40.02 acres of plant communities, and 0.03 acre of montane meadow wetlands. Overland travel would temporarily disturb 1.70 acres of plant communities.

The seven special status plant species observed in the ESVA study area do not include any State or Federal listed endangered plant species. Two of the seven plant species are on the California Native Plant Society's (CNPS) List 4 and do not meet the definition of a rare plant under the CEQA guidelines. One of the plant species is a CNPS List 1B species but is proposed for revision as a List A species. One of the species is on the CNPS List 2 which are species that are rare in California but are more common elsewhere. Two of the seven species have no current CNPS List Status, and one is a List 3 species that is proposed to be down-graded to List A. Hard-podded freckled milkvetch *(Astragalus lentigenosus* var. *chartaceus).* was not found elsewhere in the study area of the Proposed Project. Existing mitigation measures sufficiently address significant impacts to hard-podded freckled milkvetch. The addition of hard-podded freckled milkvetch to the impact analyses for an alternative to the Proposed Project does not substantially change the project impacts already addressed in the Draft EIR/S.

All of the special status plants observed in the ESVA study have been identified as likely to occur in the Draft EIR/S. In addition, all of the ESVA impacts would be fully mitigated by the mitigation measures already described in the Draft EIR/S. Impacts of the Proposed Project discussed in the Draft EIR/S would not change as a result of the ESVA. The findings of the surveys for special status plants, plant communities, and wetlands do not require the issuance of a Supplemental EIR because none of the conditions listed above has been met.

PA.23-10 The Impact Summary Tables have been revised in the Final EIR/S, to include impacts to bats and pygmy rabbits.

PA.23-11 Based on the plan view shown in Figure B.2-8, a conservative estimate of the substation's acreage, including a 3-foot border outside the fence perimeter and proposed landscaping, is 11.8 acres (see response to comment PA.23-5).

PA.23-12 The requested details are provided in the referenced section of the Final EIR/S. The referenced informal resource sensitivity rating system attempted to provide sensitivity rating values of 1 to 3 for GIS-mapped biological and cultural resources, geology/soils/paleontology, hydrology, land use, and visual resources along the corridors subjected to detailed field studies for use in route refinement within the corridors by the Applicant.

PA.23-13 Please see response to comment PA.23-5.

PA.23-14 The locations and lengths of the proposed access roads are summarized in revised Table C.3-12 of the Final EIR/S, and in Appendix E.5. Appendix E.5 summarizes the number of proposed access routes, their length, and estimates of the areas that would be impacted by surface removal or disturbance as a result of access road construction or upgrades. These areas shall be mitigated as described in Mitigation Measures B-1, B-2, and B-3.

PA.23-15 Five of the seven staging areas used by the Alturas Transmission Line Project are the same staging areas that will be used by the Tuscarora Pipeline Project and are no included in this EIR/S since they have already been addressed in the EIR/EIS for the Tuscarora Pipeline Project. The two additional staging areas are located at Border Town and Reno. The Reno substation would be constructed at a site already developed for equipment storage as part of the Sierra Pacific maintenance yard. The Boarder Town staging area would occupy approximately 8 acres adjacent to the proposed Border Town Substation site (see response to comment PA.23-5). The Border Town staging area would result in a temporary impact to low sagebrush scrub that would be mitigated by onsite restoration and offsite compensation as described in Mitigation Measure B-1.

PA.23-16 As noted in the comment, Table B-5 lists the estimated number of hillside crane landings. The Applicant estimates that 35% of the 730 structures would be constructed on slopes greater than 5% and would potentially require crane landings for erection of the structures. The crane landings would disturb an average of 10,000 square feet immediately adjacent to the structure. Additional surface disturbance associated with vehicle access to the structure site is already included in the estimates for

overland travel. The total estimated area of impact associated with the structure landings is included in the areas of temporary impacts addressed in Mitigation Measures B-1, B-2, and B-3. For additional details regarding the assessment of impacts associated with structures, please refer to response to comment PA.23-5.

PA.23-17 See responses to comment PA.23-16 and PA.23-5. Structure pads and most access roads will be recontoured and restored as specified in the Community and Habitat Restoration Plan.

PA.23-18 A sockline is the initial line used to start the conductor stringing process. It is either rope or a small, steel cable.

PA.23-19 Fertilizers shall be used only as specified in the Soil Conservation and Erosion Control Plan under preparation by the Applicant. This plan shall be submitted for regulatory agency review as described in response to comment PA.23-1.

PA.23-20 Comment noted.

PA.23-21 These alternatives were assessed across all environmental issue areas for their ability to reasonably achieve project objectives and reduce environmental impacts of the Proposed Project. Based on the screening analysis discussed in Section B-3 of the EIR/S, the referenced alternatives were eliminated from further (detailed) consideration. However, the East Side of Peterson Mountain Range Routes have been given further consideration, which is documented in a revised Section B.3.4.1; however, the decision to eliminate these routes from further (detailed) consideration is unchanged.

PA.23-22 The subject alternative route has been subjected to further consideration, which is documented in a revised Section B.3.4.1 of the Final EIR/S.

PA.23-23 The No Project Alternative considers the environmental impacts that might occur if the Proposed Project does not go forward. As stated in the referenced Section of the Draft EIR/S, no adverse environmental impacts from construction and operation of the Proposed Project would occur under this alternative. However, it is valid under the No Project Alternative to consider potential impacts that may arise as a consequence of No Proposed Project not going forward. In this case, it is highly likely that within a few years a project similar to the Proposed Project will need to be installed to meet the increasing demand for power in the region (see Section A.6, Purpose and Need for the Project).

PA.23-24 The significance criteria in the EIR/S have been developed based on CEQA (e.g., PRC 21083), the CEQA Guidelines provisions regarding mandatory findings of significance (Section 15065), Appendix G of the CEQA Guidelines, and NEPA regulations (e.g., 40 CFR 1508.27). Further discussion related to this issue is provided in responses to comments PA.23-68, and PA.23-69.

PA.23-25 The names have been spelled correctly in the Final EIR/S.

PA.23-26 The corrections have been made in the Final EIR/S.

PA.23-27 Townsend's big-eared bat has been removed from Table C.3-2 in the Final EIR/S.

PA.23-28 "Lark sparrow" has been changed to "horned lark" in Table C.3-2 of the Final EIR/S.

PA.23-29 Please see revisions to Table C.3-2 in the Final EIR/S.

PA.23-30 See response to comment PA.23-1.

PA.23-31 Low to medium elevation springs in the vicinity of the Proposed Project were sampled during 1990 in an effort to complete aquatic surveys of the entire Great Basin of California (Hershler, 1990). Springs in Long Valley, Duck Flat, and Smoke Creek Desert were found to contain hydrobiid snails from the genus *Pyrgulopsis*. These snails are currently proposed for listing as a Candidate species under the Federal Endangered Species Act. They were found on stones and within watercress plants in one spring in Long Valley in the vicinity of Hallelujah Junction in Lassen County. This location is approximately 2.5 miles from the Proposed Project area and would not be impacted by the project. Other locations with documented occurrences of *Pyrgulopsis* in the vicinity of the proposed or alternative alignments include:

- Tule Patch Springs, Lassen County
- Unnamed spring, northeast Secret Valley
- Five Springs, Lassen County.

The ESVA would cross directly over Five Springs and within 0.25 mile of the unnamed spring in the northeast end of ESVA (ESMP 9). The Tule Patch Springs site is located approximately 2 miles from the proposed ROW (MP-63).

In coordination with CDFG aquatic biologist Paul Chappel, all springs located within 0.25 mile of the proposed and alternative ROW were surveyed for the presence of *Pyrgulopsis*. These surveys confirmed the continued presence of the snails in Five Springs and the unnamed East Secret Valley spring. No additional locations of this species were identified.

Mitigation for potential impacts to this species is described under Mitigation Measure B-14. Mitigation includes use of directed blasting techniques, water quality sampling before and after blasting, and, if blasting is required in locations within 100 feet of a spring which supports this species, chemical techniques will be used rather than blasting. The Mitigation Monitoring, Compliance, and Reporting Plan will include detailed descriptions of blasting techniques and areas where blasting would be required. This plan will be submitted for regulatory agency review as described in response to comment GP.23-1.

The fingernail clam, *Pisidium ultramontanum,* is roughly distributed along the same habitat in the Great Basin as the hydrobiid snails. Impacts and mitigation measures for the clams would be the same as those for the snail.

PA.23-32 During wildlife surveys of the entire Proposed Project study area, any reptile, amphibian, and fish species observed were documented. There are no special status reptiles known to occur in the

project area. There have been sightings of the northwestern pond turtle recently in the Modoc region (please see response to comment PA.23-61). Amphibian and fish species which occur in open water habitat represented by perennial drainages will not be impacted because the transmission line will span these habitat areas. This is discussed in Section B.2.3.2, Transmission Line Construction. There will be no vehicular travel in these areas during construction or operation of the transmission line. A 200-foot buffer zone would be maintained around stream channels with adjacent or in-channel wetlands as defined by the USACE. This buffer zone is described in revised Mitigation Measure B-6. Riparian habitats which would be spanned by the Proposed Project are listed below:

Proposed Alignments
Stones Canyon (MP-26)
Crooks Canyon (MP-20.3)
Dry Creek (MP-31)
Secret Creek (existing road) (MP-72.5)
Stream Crossing north of Tule Patch rest area (MP-62)
Creek west of Tule Patch Spring rest area (MP-63)
Cherry Creek (MP-76)
Unnamed creek (MP-70)
Unnamed creek (300' north of MP-73)

Alternative Alignments
Long Valley Creek (MP-151)
W5-X1 Montane Meadow (MP-151)
X7 Southeast unnamed stream (MP-156).

PA.23-33 Please see response to comment PA.23-1.

PA.23-34 Please see revised Section C.3.1.2.1 of the Final EIR/S for a discussion of wetlands found along the Proposed Project study area.

PA.23-35 The seven special status plants that occur on Alturas volcanic gravel barrens are:

- prostrate buckwheat — *Eriogonum prociduum*
- lilliput lupine — *Lupinus uncialis*
- doublet — *Dimeresia howellii*
- Suksdorf's milkvetch — *Astragalus pulsiferae var. suksdorfii*
- Ash Creek ivesia — *Ivesia paniculata*
- troubled milkvetch — *Astragalus anxius*
- volcanic daisy — *Erigeron elegantulus.*

White ash deposits are characterized by occurrences of green prince's plume (*Stanleya viridiflora*) and occasionally by spiny milkworth (*Polygala subspinosa*).

Volcanic vertisols (fluffy clay soils) are associated with Holmgren's skullcap (*Scutellaria holmgreniorum*) and occasionally with clay-loving buckwheat (*Eriogonum collinum*) or ornate dalea (*Dalea ornata*).

Stabilized and partially-stabilized sand dunes east of Honey Lake support lance leaf scurf pea (*Psoralidium lanceolatum*) and Geyer's milkvetch (*Astragalus geyeri var. geyeri*).

PA.23-36 Unique plant community types are described in Section C.3.1.2.4 of the EIR/S and mitigation for these plant communities is summarized in Section C.3.2.2.2.

PA.23-37 The Biscar Wildlife Area located approximately 1.5 miles west of Segment L includes sage grouse nesting and brood rearing habitat. Please see the revised Impact Summary Table, Class II, in the Executive Summary Section, and the Mitigation Monitoring Table C.3-19 (Mitigation Measure B-22) for locations where perch guards would be installed to prevent increased predation on sage grouse.

Although there are no records of recent use of the Biscar Wildlife Area by greater sandhill cranes, one nest was documented in the early 1980s (Littlefield, 1988.) Segment L traverses habitat unlikely to be used by the cranes and would not create a barrier between habitat use areas. Potential nesting and foraging habitat for this species occurs in the wetland and immediately adjacent upland habitats in the Biscar Wildlife Area.

PA.23-38 The text has been revised in the Final EIR/S as suggested.

PA.23-39 The text has been revised in the Final EIR/S as suggested.

PA.23-40 The information provided in this comment has been used to create two new tables - C.3-6a and C.3-21a - in the Final EIR/S. These tables detail big game habitats crossed by the Proposed and Alternative Segments, respectively, and to be avoided during the time periods listed.

PA.23-41 A pair of greater sandhill cranes was observed in meadow habitat adjacent to Segment L by Woodward-Clyde Consultants (WCC) biologists on two occasions during early season surveys in Spring 1995. In addition, a pair attempted to nest in this location in 1994; however, the nest was abandoned. This habitat would be surveyed during preconstruction surveys and, as stated in the EIR, greater sandhill crane pairs observed nesting would be documented and monitoring requirements would apply. The reference table has been corrected in the Final EIR/S as suggested (see Table C.3-6).

PA.23-42 Comment noted. Please see Table C.3-6 in the Final EIR/S.

PA.23-43 The table headings have been changed in the Final EIR/S to include winter habitats. The values shown reflect the area within the ROW which currently supports sage grouse winter and brood habitat. Total area covered by leks was not measured due to the variability of this resource. Winter habitat and brood habitat are critical for this species' survival and were included in the analysis and the table for this reason. The lek is valuable during the breeding season, however year-round use of the habitat must be considered when assessing impacts to this species.

PA.23-44 See revised Table C.3-6 in the Final EIR/S.

PA.23-45 The referenced paragraph has been revised in the Final EIR/S.

PA.23-46 The text has been revised in the Final EIR/S as suggested.

PA.23-47 See revisions in the Final EIR/S.

PA.23-48 Holmgren's skullcap is listed in the 5th edition of the CNPS Inventory of Rare and Endangered Vascular Plants as a List 3 species (Skinner and Pavlik, 1994). However, as noted in Table C.3-8, this species has been proposed, though no final decision has been made, for inclusion on List 4 based on results of surveys for the Tuscarora Pipeline and this project. Table C.3-3 and the referenced text have been revised in the Final EIR/S to now show Holmgren's skullcap as CNPS List 3 but proposed for List 4.

PA.23-49 Table C.3-6 and Table C.3-7 have been changed in the Final EIR/S (as tables C.3-7 and C.3-8) to reflect this observation.

PA.23-50 Table C.3-6 has been changed in the Final EIR/S (as Table C.3-7) to show that *Pedicularis centranthera* is associated with sagebrush scrub on alluvial clay soils derived from white ash deposits.

PA.23-51 Habitat for Pine Creek evening primrose (*Camissonia boothii var. alyssoides*) includes rocky slopes and gravelly soils where spiny milkwort occurs; however, Raven's lomatium (*Lomatium ravenii*) has only been observed by WCC on clay soils associated with vernally flooded plains, as on the Madeline Plains. The habitat designation in Table C.3-6 and Table C.3-7 has been changed in the Final EIR/S (as Tables C.3-7 and C.3-8) to reflect these observations of Pine Creek evening primrose.

PA.23-52 The text has been changed in the Final EIR/S as suggested.

PA.23-53 The text has been changed in the Final EIR/S as suggested.

PA.23-54 The statement referring to bitterns has been removed in the Final EIR/S.

PA.23-55 The referenced text has been revised in the Final EIR/S.

PA.23-56 The referenced text has been revised in the Final EIR/S.

PA.23-57 Madeline Plains and the Honey Lake Valley provide winter habitat for bald eagles. In this region of the Proposed Project area the eagles also prey upon water fowl or rodents.

PA.23-58 Please refer to Appendix E.1 where this issue is discussed in detail.

PA.23-59 The text has been changed in the Final EIR/S as suggested.

PA.23-60 Short-eared owls build their own nests on the ground, usually in open grassland areas. They are known to nest in the same vicinity as northern harriers nest with no hostility. Short-eared owls are active mainly diurnally, however, there were no observations of this species in the project area.

PA.23-61 A western pond turtle was sighted by Cliff Harvey of the CDFG Honey Lake Wildlife Area in June of 1994 (Harvey, 1995). Pond turtles are not known to occur in this region of California and it is not known by what manner of migration or introduction that this species has arrived. However, there have been sightings recently in Modoc County, at the Modoc National Wildlife Refuge, and it is possible that the turtles migrated up the Pit River.

PA.23-62 Surveys for special status bats were conducted by Dr. Denny Constantine, mammalogist and former curator of mammals for the L.A. Museum of Natural History, during the week of August 20, 1994. The surveys included aerial surveys, surveys on foot, and night mist netting. In addition, Dr. Constantine used special electronic equipment to identify bat species by sound. (The Petersen 980 bat detector was used to convert the ultrasonic calls of bats into the audible range. It is the only bat detector which readily detects the low frequency calls of *E. maculatum* and *E. perotis californicus*.) Survey efforts were primarily focused on the area north of the Madeline Plains to Alturas with the exception of the mine shafts identified in the vicinity of Reno, Nevada. Surveys were concentrated on potential habitat within the ROW and as far away as 1 mile either side of the center line.

PA.23-63 The Tuscarora Final EIR documents a pygmy rabbit sighting near Wendel on July 18, 1994. The sighting occurred in the vicinity of Segment N, MP 91.8, approximately 1 mile west of the transmission line ROW in big sage habitat. Table C.3-19, under Mitigation Measure B-12, has been revised to include Proposed Segment N and Alternative Segment M as susceptible to pygmy rabbit habitat loss.

PA.23-64 Comment noted.

PA.23-65 Comment noted.

PA.23-66 To clarify, the pyroclastic rocks that occur in the project area southwest of Alturas are gravel-sized.

PA.23-67 Please consider the text changed as suggested.

PA.23-68 Please see the referenced section in the Final EIR/S for revisions which clearly list the significance criteria taken from CEQA guidelines and the Public Resources Code.

Reduction in numbers of special status plants was considered a significant impact in this EIR/S per Section 15065 of the CEQA Guidelines; a bullet has been added to explicitly state this threshold of significance. All impacts that are defined in the CEQA Guidelines as mandatorily significant have been treated as significant in this EIR/S.

PA.23-69 Please see the Final EIR/S for revisions to the referenced section.

PA.23-70 The Final EIR/S has been revised to show that twin arnica (*Arnica sororia*) would be affected by the Proposed Project. However, Table E.1-3 was incorrectly interpreted in regard to volcanic

daisy (*Erigeron elegantulus*), prostrate buckwheat (*Eriogonum prociduum*), lilliput lupine (*Lupinus uncialis*), and green prince's plume (*Stanleya viridiflora*). The boundaries of the known populations for each of these species have been designated as exclusion zones by the Applicant for design of the structure locations. Populations designated as exclusion zones are marked in Table E.1-3 by an "X". Access routes, wire set-up areas, and structure set-up areas in the vicinity of these populations would be flagged prior to construction. All construction activities shall be restricted to flagged areas. If a species population is inadvertently impacted, the mitigation measures recommended in this EIR/S shall be implemented. This is feasible due to the small areas of these populations and their locations near the margins of the study area.

PA.23-71 The discussion of impact duration in Section C.3.2.2.1 has been changed in the Final EIR/S to conform to the impact categories described in Table C.3-10 and elsewhere in the EIR/S (Table C.3-9 in the Draft EIR/S). For simplicity of the impact assessment, two categories of impact are addressed as follows:

- Temporary impacts: will occur only during construction and will persist for 1-50 years (period for successful restoration of most plant species)
- Permanent impacts: impacts will persist for >50 years (impacts related to permanent facilities or where full restoration is not anticipated in 50 years).

The Draft EIR/S has been changed to accommodate a 50-year recovery period because of the slow recovery of many perennial species in an arid climate such as the project area and to allow for the longer recovery period of tree species such as western juniper (*Juniperus occidentalis*) and yellow pine (*Pinus jeffreyi*). All permanent surface facilities such as substation sites, communication sites, structure footings, and permanent access roads will cause permanent impacts. Temporary impacts will result from staging areas, wire set-up areas, and other sites that will be affected only during construction. Non-bladed overland travel is separated from other causes of temporary impacts because it results in impacts with unique mitigation requirements.

PA.23-72 Table C.3-9 does not attempt to judge whether a habitat or special status species is susceptible to invasion by non-native or invasive plant species but whether this fate poses a substantial threat to the survival or integrity of the affected resource. Based on field observations of the study area it was apparent that some plant communities and special status species habitats have already been considerably altered by non-native plant species. The threat of new introductions of non-native plants was considered to be less than significant for these plant communities. Other habitats or special status species are found in areas not currently affected by significant populations of non-native species and were considered to be at substantial risk from the introduction of such species. Section C.3.2.2.2, Impact 7, accounts for the Proposed Project's potential to introduce non-native plant species along the route corridor, and provides Mitigation Measure B-8 to reduce potential impacts to a level of non-significance.

PA.23-73 Of the twenty special status species that were identified in the project study area, nine species will not be affected. These species are not included in Table C.3-9 because the existing project design would not result in any temporary or permanent impacts to their known populations. As specified

in Mitigation Measure B-3, an assessment of the project's impacts will be conducted before, during, and after construction is complete and mitigation will be assessed on the basis of these impacts. If mitigation options are required based upon preconstruction surveys, they will be detailed to CDFG for approval prior to construction. The ten species that will not be affected are listed on page C.3-52. The eleven species that will be affected by the Proposed Project are:

- Doublet (*Dimeresia howellii*)
- Suksdorf's milkvetch (*Astragalus pulsiferae* var. *suksdorfii*)
- Henderson's lomatium (*Lomatium hendersonii*)
- Cusick's stickseed (*Hackelia cusickii*)
- Raven's lomatium (*Lomatium ravenii*)
- Holmgren's skullcap (*Scutellaria holmgreniorum*)
- Pine Creek evening primrose (*Camissonia boothii* var. *alyssoides*)
- Spiny milkwort (*Polygala subspinosa*)
- Nelson's evening primrose (*Camissonia minor*)
- Lance-leaved scurf-pea (*Psoralidium lanceolatum*).
- Ptostrat buckwheat (*Eriogonum prociduum*)

Area of impact to these species habitats is summarized in the table below. Impacts are divided into the three categories defined in the EIR/S: permanent (P), temporary (T), and non-bladed overland travel (OT).

Impact Area of Plant Species Habitat

Common Name (Species)	P	T	OT
Doublet (*Dimeresia howellii*)	0	0	0.11
Suksdorf's milkvetch (*Astragalus pulsiferae* var. *suksdorfii*)	2.76	0.01	0
Henderson's lomatium (*Lomatium hendersonii*)	8.52	0.02	0
Cusick's stickseed (*Hackelia cusickii*)	2.10	0.01	0
Raven's lomatium (*Lomatium ravenii*)	5.11	0.02	3.19
Holmgren's skullcap (*Scutellaria holmgreniorum*)	3.17	0.01	0
Pine Creek evening primrose (*Camissonia boothii* var. *alyssoides*)	0.23	0	0.78
Spiny milkwort (*Polygala subspinosa*)	3.55	0.01	0
Nelson's evening primrose (*Camissonia minor*)	0.23	0	0.42
Lance-leaved scurf-pea (*Psoralidium lanceolatum*)	0.11	0	0.43
Prostrat buckwheat (*Eriogonum prociduum*)	0	0	0.14

Potential impacts were determined from estimates of the project footprint based on the existing project description. The responses to comments PA.23-75 and PA.23-76 outline the contingency measures, that have been added to Mitigation Measures B-3 and B-5, for inadvertent impacts to special status plant species.

The mitigation and monitoring requirements to ensure that the species and habitats marked for avoidance are not affected will be specified in the Mitigation Monitoring, Compliance, and Reporting Plan. The Applicant is currently preparing this plan and will submit it for review to the resource agencies prior to construction (see response to comment PA.23-1).

Mitigation options for inadvertent impacts to special status plant species shall include:

- Avoidance
- Restoration and monitoring
- Offsite compensation.

PA.23-74 The habitat restoration strategy, the monitoring strategy, and the contingency plans in the event of restoration failure will be thoroughly described in the Community Habitat and Restoration Plan and will include the elements mentioned in this comment (see Appendix E.3 which generally describes the components of this plan). The Applicant is preparing this plan, the specific details of which shall be negotiated between the responsible agencies, and will submit it to the agencies prior to construction.

The construction schedule shall be timed to allow preconstruction identification of special status plant populations designated for avoidance (see Table E.1-3). Surveys will be timed to coincide with the optimal period for identification of these populations. Preconstruction surveys will be completed and approved by BLM, CPUC, and CDFG prior to the start of construction.

PA.23-75 Please see revised Mitigation Measures B-3 and B-5, which include a contingency measure for inadvertent impacts to special status plant species.

PA.23-76 **Segment A:** Populations of lilliput lupine (*Lupinus uncialis*) and prostrate buckwheat (*Eriogonum prociduum*) occur in the study area for Segment A, but no direct or indirect impacts to these populations is anticipated. **Segment C:** Raven's lomatium (*Lomatium ravenii*) and Holmgren's skullcap (*Scutellaria holmgreniorum)* do not occur on Segment C. Populations of doublet (*Dimeresia howellii*) and twin arnica (*Arnica sororia*) occur in the study area for Segment C but will not be directly or indirectly affected by the Proposed Project. **Segment E:** Holmgren's skullcap (*Scutellaria holmgreniorum*) and Henderson's lomatium (*Lomatium hendersonii*) do not occur in the study area for Segment E. Populations of twin arnica and purple loco (*Astragalus agrestis*) occur on Segment E but will not be directly or indirectly affected by the Proposed Project. **Segment K:** Henderson's lomatium does not occur in the study area of Segment K, and populations of volcanic daisy (*Erigeron elegantulus*) and clay-loving buckwheat (*Eriogonum collinum*), which do occur within this segment, will not be directly or indirectly affected by the Proposed Project. **Segment L:** Cusick's stickseed (*Hackelia cusickii*) does not occur in the project study area for Segment L. Populations of falcate saltbush (*Atriplex gardneri* var. *falcata*), dwarf lousewort (*Pedicularis centranthera*), and green prince's plume (*Stanleya viridiflora*) which occur in Segment L will be avoided by placing structures outside of the limits of these populations and by placing overland travel exclusion zones around these populations. Falcate saltbush, dwarf lousewort, and green prince's plume have well-defined habitats that will be clearly marked prior to construction. **Segment O:** No known populations of nodding buckwheat (*Eriogonum nutans*) have been identified in the study area for the Herlong Lateral of the Tuscarora Project in the proximity of Segment Q, and this species has not yet been observed in the Alturas Transmission Line Project study area. Occurrences of Nelson's evening primrose (*Camissonia minor*) will be avoided during construction of Segment O. **Segments X and Y:** All known populations of altered andesite buckwheat (*Eriogonum robustum*) will be clearly marked prior to construction and avoided. The altered andesite habitat is easily

delineated from the surrounding plant communities and all overland travel, structures, and wire setup areas will be located outside of the habitat for this buckwheat species.

Mitigation Measures B-3 and B-5 have been revised to provide additional protection of falcate saltbush, dwarf lousewart, and green prince's plume.

Field surveys of the East Secret Valley Alternative were completed in June 1995 and the results are summarized in Appendix E.6 of this document.

PA.23-77 Please see the response to comment PA.23-75.

PA.23-78 Please see the response to comment PA.23-1.

PA.23-79 The methods and assumptions used to determine the area of plant communities and special status species habitat is described in Sections C.3.2.1.2 and C.3.2.2.1. Area of affected natural plant communities was calculated by comparing the project description in Part B of the EIR/S with field maps showing the linear extent of the communities in the study corridor. The area of affected special status species habitat was derived from the information presented in Table E-3 in Appendix E.1 and by comparing the size and location of the staging areas, substations, and communications facilities with the location of special status plant populations. See also response to comment PA.23-5.

PA.23-80 The suggested revision has been incorporated into the Final EIR/S.

PA.23-81 The Fifth Edition of the CNPS Inventory of Rare and Endangered Vascular Plants in California (Skinner and Pavlik, 1994) placed Holmgren's skullcap (*Scutellaria holmgreniorum*) on List 3 due to uncertainties caused by taxonomic changes published in the Jepson Manual (Hickman 1993). The taxonomic treatment published in the Jepson Manual placed Holmgren's skullcap with the more common taxon, *Scutellaria nana*. Based on this change, USFWS downgraded Holmgren's skullcap to Category 3(c) because the taxonomic change made this species "too widespread or not threatened at this time" (Skinner and Pavlik, 1994). Field surveys in the project area suggest that a distinct species does exist on volcanic vertisol soils as described in the Intermountain Flora (Cronquist, et al. 1984). Holmgren's skullcap has been proposed for placement on CNPS List 4 based on the recent field work. For this reason, Holmgren's skullcap has been included in this EIR/S as a special status plant species. However, to maintain consistency with the latest published designation, Holmgren's skullcap in the Final EIR/S is listed as CNPS List 3, proposed for List 4.

PA.23-82 The text has been changed as suggested.

PA.23-83 Comment noted.

PA.23-84 Consider text changed to indicate that contingency measures may be implemented at any time during the 5 year monitoring period, if they are necessary. Specific contingency measures will be specified in the Soil Conservation and Erosion Control Plan and will include onsite and offsite options.

PA.23-85 Existing access roads utilized during construction by the Applicant would remain open or closed at the discretion of the individual land owners or management agencies. However, Mitigation Measure B-6 has been changed as suggested in the Final EIR/S. Appendix E.5 details the project impacts due to the development of access roads, and identifies those roads which would remain open after project construction (permanent impacts) and those that would be restored to pre-project conditions (temporary impacts).

PA.23-86 See response to comment PA.23-79.

PA.23-87 The acreage calculation given in Mitigation Measure B-11 reflects only the amount of habitat which would be displaced due to structure construction. The primary impact of the project on sage grouse habitat is an increase in perching opportunities for raptors such as golden eagles. Perch deterrents specified in Mitigation Measure B-20 are required to off-set this impact. Potential impacts to sage grouse due to vehicular travel and human disturbance would be mitigated through Mitigation Measures B-14, B-16, and B-17, which include speed restrictions, restrictions on travel in lek locations and brood habitat during specific time periods, and biological monitoring.

PA.23-88 Exact locations of wildlife resources are not listed due to the potential for disturbance by humans. However, for the purposes of this environmental document, many of the resources are shown in the revised base maps provided at the end of Volume I, of the Final EIR/S. Exact coordinates of these resources may be obtained through the CDFG Region I office in Redding, California. All observations of wildlife are recorded and filed in their offices.

Preconstruction surveys will be required to establish current year nesting sites for greater sandhill cranes and raptors. In addition, burrowing owl burrows, badger burrows, and other specific habitat uses will be clearly identified for the current year. The mitigation for wildlife takes into consideration the fact that the species are mobile. *Potential* habitat for wildlife species has been identified in the EIR/S in order to establish an estimate of the impacts as a result of the Proposed Project. The mitigation measures will apply even if the specific habitat use changes on a yearly basis.

PA.23-89 Table C.3-13 has been changed in the Final EIR/S as suggested (now Table C.3-14).

PA.23-90 Table C.3-13 has been changed in the Final EIR/S as suggested (now Table C.3-14).

PA.23-91 Text discussing Wildlife Impact 7 and Mitigation Measure B-16 have been changed in the Final EIR/S to incorporate the suggestion.

PA.23-92 Mitigation Measure B-23, which addresses Wildlife Impact 13, specifically includes placement of perch deterrents in pygmy rabbit habitat. However, the paragraph discussion has been modified in the Final EIR/S to also include, specifically, potential impacts to pygmy rabbits.

PA.23-93 Segment N has been added to Mitigation Measure B-23 for sage grouse and pygmy rabbit present in some locations.

PA.23-94 The text has been changed in the Final EIR/S as suggested.

PA.23-95 The list of special status plant species affected by both the Tuscarora Pipeline and Alturas Transmission Line was derived from the Draft EIR/EIS published for the Tuscarora Pipeline Project. The list in Section C.3.2.3 has been amended to include the additional species noted, with the exception of egg lake monkey flower (*Mimulus pygmaeus*), which was not observed in the Alturas Transmission Line Project study corridor and will not be affected by this project.

Consider the following added to the list of species affected by both the Tuscarora and Alturas Transmission Line projects in the Final EIR/S:

- twin arnica (*Arnica sororia*)
- falcate saltbush (*Atriplex gardneri* var. *falcata*)
- Nelson's evening primrose (*Camissonia minor*)
- doublet (*Dimeresia howellii*)
- volcanic daisy (*Erigeron elegantulus*)
- clay-loving buckwheat (*Eriogonum collinum*)
- lilliput lupine (*Lupinus uncialis*)
- dwarf lousewort (*Pedicularis centranthera*)
- lance-leaved scurf-pea (*Psoralidium lanceolatum*)
- Holmgren's skullcap (*Scutellaria holmgreniorum*)
- green prince's plume (*Stanleya viridiflora*).

Table C.3-7 lists by segment the number of populations of each special status species observed within the project study area.

PA.23-96 Comment noted.

PA.23-97 Comment noted.

PA.23-98 Syd Kahre reported one sighting of a pair of sage grouse in the Hallelujah Junction Wildlife Area northwest of Border Town, two miles west of the proposed segment at MP-148 (Kahre, 1995). This incidental observation represents the only known grouse sighting in the vicinity. The habitat in the vicinity of the Proposed Project is not likely to support sage grouse populations. Therefore, Alternative Segments S, U, Z, WCFG, and X-East would not significantly impact sage grouse habitat.

PA.23-99 A more detailed biological survey of the ESVA was conducted in Spring 1995. This survey found the ESVA to have greater impacts to wildlife resources than the Proposed Segment L. Its longer length would impact more habitats and create more additional perches than Segment L. See Appendix E.6 of the Final EIR/S for potential impacts to mule deer, pronghorn, sage grouse, and American badger in the vicinity of the ESVA.

PA.23-100 Comment noted. However, the sage grouse habitat in this vicinity is degraded and the pygmy rabbit habitat does not extend to the transmission line ROW.

PA.23-101 Impacts to the Doyle Wildlife Area are discussed under Segment P in the EIR/S.

PA.23-102 A formal Mitigation Monitoring, Compliance, and Reporting Plan would be developed for the Proposed Project prior to the start of construction. The plan will describe the organization and operation of the monitoring program, monitoring tasks, and protocols for reporting and initiating corrective action. The final plan will be submitted to the responsible agencies for review and approval. See also response to comment PA.23-1.

PA.23-103 This suggestion is included under Mitigation Measure B-14 in Section C.3.2.2.3. The table referenced in the comment (not Table C.3-22 in the Final EIR/S) succintly summarizes the mitigation measures described in the document and does not itemize every detail.

PA.23-104 Mitigation Measure B-12 of the referenced table has been revised in the Final EIR/S (as Table C.3-22) to include Segments N and M as suggested.

PA.23-105 Comment noted. See Table C.3-22, Mitigation Measure B-23, in the Final EIR/S for specific locations for increased raptor and raven perching opportunities. These locations were identified during a winter raptor survey conducted in early 1995. See Appendix E.9 of the Final EIR/S for more details on the survey.

PA.23-106 See response to comment A.1-98.

PA.23-107 Wetlands are discussed in Section C.3.1.1.2 of the EIR/S. See also Section C.3.1.2.1 of the Final EIR/S for a discussion of wetlands found along the Proposed Project study area.

PA.23-108 See response to comment OC.32-3.

PA.23-109 The total wetland area crossed by Alternative Segment B is greater than that crossed by Proposed Segment A. This wetland area supports waterfowl, shorebirds, raptors, and greater sandhill cranes. The additional length of transmission line through this wetland habitat increases the potential for impacts to these species; therefore, the potential impacts associated with Segment B would be greater. The relevant sections of Final EIR/S Part D have been revised to clarify these points.

PA.23-110 Comment noted. The potential impacts associated with the ESVA are further discussed in Appendix E.6 of this document and the key findings are incorporated into Final EIR/S Part D as appropriate for comparison of alternatives.

PA.23-111 The possibility that the Proposed Project could encourage future development is addressed in Part E of the Final EIR/S. However, as with any future proposal, the growth-inducing impacts of the Balls Canyon Ski Resort project would also be the subject of a separate environmental impact analysis for that specific project, not the proposed Alturas Transmission Line Project. It should be noted that the application for the subject resort with Sierra County has been withdrawn.

PA.23-112 The outline and description of the Final Mitigation Monitoring, Compliance, and Reporting Plan that is provided in the Final EIR/S serves as a guide to the assembly and implementation of all of the individual plans required. Detailed plans will be prepared, assembled, and interpreted prior to construction. Also see responses to comments PA.23-1 and PA.23-102. Preconstruction plans will provide specific compliance criteria for each of the potentially affected resources as recommended.

PA.23-113 The CDFG would receive copies of all monitoring reports and would be notified immediately of any violations of the environmental specifications.

PA.23-114 Comment noted. Please refer to the revised text of the Mitigation Monitoring Program table in Part F of the Final EIR/S.

PA.23-115 The Final EIR/S includes Segment O under the list of segments to which Mitigation Measure B-10 will be applied.

Segment K and Segment O have been added to Table C.3-13 in the Final EIR/S. A small amount of overland travel will occur within migration habitat for this species along Segments K and O.

PA.23-116 Comment noted.

PA.23-117 Comment noted.

PA.23-118 Please see revisions to page E.1-45 in the Final EIR/S.

PA.23-119 Please see response to comment PA.23-31.

H.5 RESPONSES TO COMMENTS FROM PUBLIC HEARING TRANSCRIPTS (T)

TA	Alturas Public Hearing	(TA=transcript Alturas)	49
TS	Susanville Public Hearing	(TS=transcript Susanville)	30
TL	Loyalton Public Hearing	(TL=transcript Loyalton)	20
TR	Reno Public Hearing	(TR=transcript Reno)	65

SET # TA.1 MR. BARAGER

TA.1-1 As stated in the Draft EIR/S, the Proposed Project alignment runs within approximately 700 feet of the north end of the Wessinger private airstrip, which would render the airstrip unsafe to operate. While the impact of the project is significant from the perspective of the airstrip owner, it is not considered to be a significant impact in the EIR/S because private uncharted airstrips are not subject to the restrictions and guidelines of the FAA. If the project alignment were to be relocated to the west, as suggested in the comment, it would not alter the EIR/S finding of an adverse but not significant (Class III) impact. It would, however, allow the airstrip to continue to be used by the owner.

It is acknowledged that adjusting the Proposed Project such that Segment AØ6-CØ3 is located slightly further to the west may render the route less visible to properties located to the east of the route. However, it should be noted that such an adjustment may negatively impact other resources, thereby offsetting the possible lessening of visual impacts.

The proposed alternative has been considered for the Final EIR/S; the results are presented in Section B.3.4.1.

SET # TA.2 MS. FLOURNOY

TA.2-1 Please see responses to comments GP.8-2 and GP.52-2.

TA.2-2 Section C.10.1.4.8 of the Final EIR/S discusses the effects of magnetic fields on live stock.

TA.2-3 See response to comment GP.110-5. The Proposed Project would not require deep holes. The shallow, widely spaced holes that would be drilled for this project are not likely to impact springs and ground water.

TA.2-4 Powerline collisions are a potential impact of the Proposed Project. This issue is addressed in the Final EIR/S in Section C.3.2.2.3 and in Mitigation Measures B-20 and B-22. See also response to comment OC.11-5.

TA.2-5 See response to comment GP.2-2.

SET # TA.3 MS. CANTRALL

TA.3-1 Comment noted. Please see responses to comments GP.6-1, GP.10-1, and GP.30-1.

TA.3-2 See responses to comments GP.110-5 and TA.2-3. The shallow widely spaced nature of footings for this project are not likely to alter springs or ground water.

Seismic activity or earthquake fault displacement could alter ground water and springs, but this project will not cause those earthquakes or fault reactivation. Those are natural processes occurring deep (miles) within the earth's crust. The depth of penetration of the Proposed Project relative to these deep crustal forces would be analogous to a pin prick on an onion skin relative to the core of the onion.

SET # TA.4 JIMMIE R. FERGUSON

TA.4-1 Comment noted. Bald eagles and a variety of hawks winter in the Pit River area in the vicinity of the Proposed Project. This issue is addressed in the Final EIR/S in Section C.3.1.2.3 and in Appendix E.9 of this document.

TA.4-2 Surveys for special status bat species were conducted in August 1994 by Dr. Constantine. A population of Townsend's big-eared bats was discovered in the Infernal Caverns region. This issue is discussed in Section C.3.1.2.3 of the EIR/S.

SET # TA.5 MR. STAHL

TA.5-1 Please see Section C.3.1.1 of the Final EIR/S for a discussion of wildlife species observed in the vicinity of the Proposed Project, which includes the Likely Mountain area. Temporary indirect impacts to wildlife would occur as a result of construction of the proposed transmission line. These impacts are discussed in Section C.3.2.1.2, and mitigation measures for temporary indirect impacts are described in Section C.3.2.2.3.

TA.5-2 Potential impacts to greater sandhill cranes are discussed in the Final EIR/S in Section C.3.2.2.3, Appendix E.1, and Appendix E.10. See also response to comment GP.20-3.

TA.5-3 The potential visual impact of Proposed Segment C is described in Section C.13.2.2.4 of the EIR/S. Due to the visual sensitivity of this area to fishermen, hunters, and other recreationists, two Key Observation Points were established in the vicinity. Key Observation Point No. 5 was specifically established at a location where the Proposed Project would be highly visible in order to assess the visual impacts on "people seeking outdoor recreational activities." Key Observation Point No. 23 was established to assess the visual impact on recreationists in the Nelson Corral Reservoir area as described in Section C.13.3.2.2.

TA.5-4 See response to comment GP.20-7.

TA.5-5 See response to comment GP.20-2.

TA.5-6 The base maps included in the Final EIR/S (see end of Volume I) illustrate the Proposed Project alignment and 660-foot study corridor. The maps are based on topographic maps prepared by the U.S. Geological Survey (USGS). A scale of one inch to every two thousand feet was used. Based on this scale, in most cases, at least 2,000 feet of the area surrounding the project study area is presented. Please note, however, that only the resources within the study corridor are illustrated, unless otherwise provided on the USGS topographic maps.

TA.5-7 See response to comment PA.22-5.

TA.5-8 Section C.8.1.4.3 of the EIR/S includes discussions of the recreation areas and uses in Modoc and Lassen Counties. Project construction impacts on recreational uses are addressed in Section C.8.2.2.1. Project operations impacts on recreational uses are addressed in Section C.8.2.2.2.

TA.5-9 See responses to comments GP.1-3 and GP.14-11.

SET # TA.6 MR. KRAUEL

TA.6-1 Please see responses to comments GP.1-3, GP.14-11, GP.30-1, GP.41-7, and GP.41-18.

TA.6-2 See responses to comments GP.41-12, GP.41-14, and GP.41-23.

TA.6-3 See response to comment OC.2-1. Experience with other interpretive developments such as the BLM's petroglyph interpretive trail at Grimes Point, near Fallon, Nevada, have resulted in increased visitor use and reduced incidents of vandalism.

TA.6-4 See response to comment GP.41-3.

TA.6-5 See responses to comments GP.41-12 and GP.41-14.

TA.6-6 See responses to comments GP.14-11 and GP.52-3. As acknowledged in Section B.4.3 of the Draft EIR/S, under the No Project Alternative, the impacts of the project would not occur. However, as discussed in Sections A.6.2 and A.6.5 of the Final EIR/S, SPPCo is experiencing existing service constraints and anticipates future failure of a 120 kV line, resulting in line damage or an interruption of service. Under these conditions, when considering the No Project Alternative, the environmental consequences of not having the project in place must be addressed. Based on the independent review of the Aspen Team utility engineer, SPPCo would need to augment their system. Exactly how this would occur is not definite, but it was concluded that it was reasonable to expect that SPPCo would require a major transmission line by the year 2000-2002.

TA.6-7 While the Lead Agencies in preparing an EIR/S on a project of this scope and magnitude may wish to avoid making difficult conclusions from the analytical results, CEQA Guidelines [Section 15126(d)(2)] require that, if the environmentally superior alternative is the No Project Alternative, the EIR must identify an environmentally superior alternative among the other alternatives. NEPA regulations [40 CFR 1502.14(e)] requires identification of the Federal Lead Agency's preferred alternative or alternatives.

TA.6-8 Section E.3.3.1 has been revised in the Final EIR/S to include a discussion of the growth-inducing effects of expanded telecommunications within the Proposed Project region.

SET # TA.7 MR. LEE ANDERSON

TA.7-1 Please see response to comment GP.41-3.

TA.7-2 See responses to comments GP.1-3 and GP.14-11. Section E.3.3 has been revised to include a discussion of the growth-inducement impacts of the Proposed-Project as they relate to the establishment of an utility corridor.

TA.7-3 See response to comment TA.7-2.

TA.7-4 As presented in revised Section B.3.4.2.6 of the Final EIR/S, the recently approved Southwest Intertie Project (eastern Nevada) includes 2000 foot separation distances from existing, major transmission lines (new 500 kV line in an existing 345 kV corridor - approved by the U.S. Department of the Interior, BLM).

TA.7-5 As discussed in Section B.2.4.1, with the proper maintenance, SPPCo expects that the operational life of the Proposed Project would be indefinite with proper design, quality materials, an aggressive maintenance program, and the dry climate. If the project were to be abandoned, impacts due to abandonment would be comparable those impacts identified in the EIR/S for construction.

TA.7-6 There is no data to indicate that habitat in the project area would require centuries to recover. However, the mitigation recommended for loss of vegetation includes a combination of restoration and offsite mitigation (see Mitigation Measure B-1). The offsite mitigation is intended to compensate for the time during which the habitat is recovering from disturbance.

SET # TA.8 MR. ARMSTRONG

TA.8-1 Please see response to comment GP.9-1.

TA.8-2 Section E.3.3 has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project.

TA.8-3 Section A.6.9.1 has been expanded to provide an update on the current System Operation Review of the Columbia River system and how it would affect SPPCo's access to the Pacific Northwest power market.

TA.8-4 See response to comment GP.9-1.

TA.8-5 Potential impacts to avian species include collision with powerlines, electrocution, and indirect disturbance during construction. The first two (direct impacts) would be mitigated through substation design to minimize electrocution hazard, marking powerlines, and establishing offsite compensation habitat for residual losses of greater sandhill cranes. Mitigation for indirect impacts would include monitoring of construction activities by qualified biologists, timing of construction period to avoid disturbance to nesting birds of prey, avoidance buffer zones for wildlife resources, and preconstruction surveys to identify locations of occupied nests. Please see Mitigation Measures B-14 through B-23.

The species mentioned are protected under the Endangered Species Act of 1973. Under this Act, USFWS may authorize "incidental take" (i.e., an allowance for a specific take limit as an incidental result of a project) for protected species, such as the bald eagle and Swainson's hawk. Mitigation and monitoring plans must satisfy USFWS requirements in protecting sensitive species to the greatest extent possible before the agency will issue an incidental take permit (see response to comment PA.23-1 regarding preparation of the plans).

Regarding burying the transmission line, please see responses to comments GP.10-1 and TA.8-11.

TA.8-6 See responses to comments GP.41-24 and GP.135-13. The proposed powerline would not impede access to the Mt. Shasta.

TA.8-7 See responses to comments TA.2-2 and GP.2-2.

TA.8-8 See response to comment GP.68-1.

TA.8-9 See response to comment GP.135 which addresses these same concerns. In addition, it should be pointed out that there would be numerous faults of similar nature to those along the Proposed Project along any Nevada route. It would be difficult to find a route in Nevada that has much less of a seismic or fault displacement hazard.

The future studies required by the mitigations are to address site-specific design issues. The details of these investigations are much greater than what is required for an EIR/S. Conducting such studies should enhance public confidence that the project is being conducted with their health, safety and welfare in mind. There is enough information in the EIR/S to adequately evaluate impacts and to specify appropriate mitigation measures to minimize adverse environmental impacts. However, there are some design and engineering aspects that can only be ascertained by site-specific studies. These are generally esoteric technical details such as which of the faults could cause the most damage. It is already known that the project can be designed to withstand the largest fault displacements that are likely to occur on any of the faults in the region. The details of exactly how to do this have no bearing on whether the project is feasible.

The reference to structures in Mitigation Measure G-2 is to the support towers that elevate the power line above the ground. The power line itself is not considered to be a structure. Elevated power lines have great ductility and are perhaps the best way to cross faults because they can accommodate large lateral and vertical fault displacements. As discussed in response to comment GP.135-25, few faults along the Proposed Project are classified as active (see Table C.6-3) and these can be spanned quite easily.

TA.8-10 The information gathered for Section C.7, Hydrology, of the EIR/S is adequate to identify the probable impacts and to determine whether the project can be built without creating significant adverse impacts. Generally there are several ways to minimize the impacts. These are given in general terms in the EIR/S. The minute details will be worked out in the various detailed plans that are in fact required by guidelines, regulations, and laws. The intent of the ruling not allowing "future studies" is to prevent projects from being built without due process of CEQA and NEPA. This EIR/S is in full accordance with legal precedent.

TA.8-11 Placing the transmission line underground at the Pit River crossing would reduce impacts to avian species. However, the level of surface disturbance required to accomplish this would likely impact special status fish species such as the Pit Roach, and create impacts to wetlands and nesting habitat used by sandhill cranes and other ground-nesting species. It would also likely result in the temporary

loss and removal of jurisdictional wetlands and riparian plant communities. See also response to comment GP.10-1 concerning the issue of burying the transmission line underground.

TA.8-12 See responses to comments OC.2-1 and TA.6-3.

TA.8-13 See responses to comments GP.1-3, GP.14-11, and GP.30-1.

TA.8-14 See response to comment GP.9-1.

SET # TA.9 MS. CLARK

TA.9-1 Comment noted. The EIR/S (including the Draft EIR/S reviewed by the commenter) is being prepared by a third-party independent contractor at the sole direction of the Lead State and Federal Lead Agencies, the California Public Utilities Commission and the U.S. Bureau of Land Management, respectively. The California Department of Fish and Game (CDFG), as a Responsible Agency with additional permitting authority over the project, provides input and expertise, primarily in the areas of biological and water resources consultation, and carefully reviews key project documents and provides comments pertaining to its areas of expertise and its permitting and resource trustee authorities. The CDFG is not conducting, directing, or funding the preparation of this EIR/S, although some funding for its review efforts has been provided by the Applicant.

SET # TA.10 MR. DEES

TA.10-1 Comment noted.

SET # TA.11 MR. DUNN

TA.11-1 Please see response to comment GP.132-4.

TRANSCRIPT SUSANVILLE (TS)

SET # TS.1 MR. HILL

TS.1-1 The base maps at the end of Volume I of this EIR/S illustrate the alignment of the Tuscarora Pipeline when it is in close proximity to the Proposed Alturas Transmission Line Project. Section B.3.4.1 of the Final EIR/S discusses the use of the Tuscarora Pipeline alignment for the Proposed Project.

TS.1-2 Please see responses to comments GP.1-3 and GP.30-1.

TS.1-3 See response to comment GP.61-1.

SET # TS.2 MS. BOWEN

TS.2-1 Section C.8.2.2 has been revised in the Final EIR/S to include a discussion of the Proposed Project land use impacts on Rancho San Rafael Park. The Proposed Project would not have a significant impact on flooding and would not significantly interfere with the Evans Creek flood control project.

TS.2-2 Please see responses to comments GP.1-3 and GP.30-1. In order to drop the voltage of the 345 kV line, several parallel 120 kV or 230 kV lines would be required. A system of parallel lines would not reduce or eliminate the environmental impacts of the Proposed Project (CEQA criteria to be considered when addressing the feasibility of alternatives - see Section B.3.2 of the EIR/S). See revisions to Section B.3.4.6.2 in the Final EIR/S.

TS.2-3 See response to comment PA.22-5. The sensitive receptors, including residential, within 2,000 feet of the Proposed Project are summarized in Table C.8-1 of the Final EIR/S.

TS.2-4 See revised Section B.3.4.6.2 in the Final EIR/S.

TS.2-5 See response to comment GP.8-2.

TS.2-6 See responses to comments GP.52-3 and TS.2-2.

SET # TS.3 MR. CHORAK

TS.3-1 As discussed in Section A.6.2, SPPCo provides service to approximately 40,000 customers in northeastern California.

TS.3-2 See responses to comments GP.1-3 and GP.14-11.

TS.3-3 Some of the species listed in this comment, such as mule deer, pronghorn antelope, and bald eagle, are special status species and are addressed in Sections C.3.1.2.3 and C.3.2.2.3 of the EIR/S. Others, such as fox, coyote, cottontail rabbit, and crow, are considered in Mitigation Measure B-16. This mitigation measure was designed to protect wildlife species which occur in the project area, but are not special status species or considered rare, threatened, or endangered. CEQA only requires that specific studies be conducted to identify impacts to special status species. Therefore, specialized studies are not required for the other animals listed in this comment.

Impacts to wild horses in the vicinity of the proposed Alturas substation would be short-term and would occur during the construction period. During the construction period, restrictions on speed limits, firearms, and pets in the project area (included in Mitigation Measure B-16) will be enforced to minimize impacts to animals in the vicinity. Biological monitors will be present to verify enforement of these measures.

SET # TS.4 MR. BATTLES

TS.4-1 Comment noted.

SET # TS.5 MR. HERMAN

TS.5-1 Please see responses to comments GP.1-3 and GP.14-11. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

TS.5-2 See revisions to Sections A.6.2.4 and A.6.5 of the Final EIR/S.

TS.5-3 Sections A.6.4 and A.6.6 of the EIR/S present the economic benefits of the Proposed Project, including improved wheeling services and spot market purchases from the Pacific Northwest power market. A summary of SPPCo's existing and future (as requested) wheeling demand is presented in Section A.6.2 of the Final EIR/S.

TS.5-4 Additional consideration of alternative routes east of Peterson Mountain has been given and the results are presented in a revised Final EIR/S Section B.3.4.1.

TS.5-5 Additional consideration has also been given to the comparison between alternatives within Long Valley, particularly Proposed Segment T versus Alternative Segments S and U and the results are presented in a revised Part D of this Final EIR/S .

TS.5-6 See responses to comments GP.1-3, GP.14-11, and GP.30-1.

TS.5-7 See response to comment GP.14-63.

TS.5-8 Section A.6.9.1 has been expanded to provide an update on the current System Operation Review of the Columbia River system and how it would affect SPPCo's access to the Pacific Northwest power market.

SET # TS.6 MR. ELLIOTT

TS.6-1 Comment noted.

SET # TS.7 MS. HOUSTON

TS.7-1 Comment noted.

SET # TS.8 MS. EIDE

TS.8-1 Comment noted.

SET # TS.9 MR. BAXTER

TS.9-1 Comment noted.

TS.9-2 Comment noted. Section A.6.7.5 has been revised to reflect the Memorandum of Understanding executed between LMUD and SPPCo.

PUBLIC HEARING TRANSCRIPT LOYALTON (TL)

SET # TL.1 MR. SKEEN

TL.1-1 Comment noted.

SET # TL.2 MS. LOVERIN

TL.2-1 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

TL.2-2 Please see response to comment TL.2-1 regarding growth inducement. See response to comment GP.14-3 regarding growth in the North Valleys area of Washoe County. See response to comment OC.28-5 regarding the CC&Rs for the Border Town Substation site.

TL.2-3 See responses to comments OC.19-2, OC.28-21, OC.28-22, and OC.28-23.

TL.2-4 Please see responses to comments OC.28-17,18,19.

TL.2-5 Figures C.13-16A and B present photosimulations of the proposed Border Town Substation site.

TL.2-6 Comment noted. The sentence noted by the commenter has been corrected to note that the closest developed land uses to the proposed substation site include a tank farm and pallet construction yard.

SET # TL.3 MS. ELDRED

TL.3-1 Please see responses to comments GP.1-3, GP.14-11, and GP.30.1. Further consideration has been given to the Nevada Alternative employing the LADWP corridor (see Section B.3.4.6.2), Eastside Route 2 (Section B.3.4.1), and other alternatives in this Final EIR/S document. Section B.3.4.6.2 of the Final EIR/S addresses the Applicant's responsibility with respect to permitting timelines.

TL.3-2 See responses to comments OC.19-2, OC.28-21, OC.28-22, and OC.28-23.

TL.3-3 See response to comment TL.2-1.

SET # TL.4 MR. GUTMAN

TL.4-1 With respect to the comparison of alternatives, the methodology, information considered, and conclusions were presented in detail in Part D of the Draft EIR/S, with some minor revisions and clarifications to Part D provided in this Final EIR/S. In brief, the conclusions and findings of Part C (Environmental Analysis) and the Impact Summary Tables have been brought together in a comparison matrix in which the impacts, by environmental issue area and impact type, of all of the alternatives considered in detail are arrayed side-by-side. Based on these side-by-side comparisons, by issue area, the alternative that offers a clear or minor environmental advantage for that issue area was designated (or if no advantage was discernible this was so designated). Based on the array of these designations (presented in Table D.2-1) the environmentally superior alternative was designated, with the key factors in the designation highlighted in Section D.2.1. With respect to the No Project Alternative (considered on an issue-by-issue basis in Part C of the Draft EIR/S) and the various transmission alternatives considered in Section B.3.4.6.2 of the Final EIR/S, it was found that these alternatives did not offer potential advantages over the Proposed Project.

TL.4-2 Please see responses to comments GP.8-2 and GP.52-2. Section B.3.4.6.2 of the Final EIR/S has been revised to clarify that the EMF impacts to the residents of Sparks is because separation distances between the project and residences would be restricted, in comparison to the Proposed Project, because of existing urban development.

TL.4-2 See response to comment GP.21-4.

TL.4-3 As discussed in Section A.6.6, the availability of hydroelectric power provides SPPCo with an economic benefit, not a system need. Section A.6.9.1 has been expanded to provide an update on the current System Operation Review of the Columbia River system and how it would affect SPPCo's access to the Pacific Northwest power market. Sections A.6.2.4 and A.6.5 of the Final EIR/S discusses SPPCo's existing and projected wheeling operations.

SET # TL.5 MS. LEWIS

TL.5-1 Comment noted.

SET # TL.6 MS. ZEBRACK

TL.6-1 See response to comment OC.20-1.

SET # TL.7 MR. BEALS

TL.7-1 This Final EIR/S is our attempt to the best of our ability to address the concerns expressed and to produce a document that more completely meets the requirements of the decisionmakers

and the public. We have addressed and incorporated as appropriate the comments of Sierra County in this Final EIR/S; for responses to the written comments of Sierra County, please see the responses to comments set PA.5.

SET # TL.8 MR. HERMAN

TL.8-1 Please see response to comment TL.4-3.

TL.8-2 Additional consideration has been given to the comparison between alternatives within Long Valley, particularly Proposed Segment T versus Alternative Segments S and U, and the results are presented in a revised Part D of the Final EIR/S.

TL.8-3 See responses to comments GP.1-3 and GP.14-11.

TL.8-4 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

TRANSCRIPT RENO (TR)

SET # TR.1 MS. BOHN

TR.1-1 Section C.8.2.2 has been revised to address the Proposed Project land use impacts on the Peavine Peak area near the Horizon Hills development. Section C.8.2.2 of the Final EIR/S also addresses project construction and operations impacts, respectively, on residential uses. As concluded in the noted section, the significant visual impacts in residential areas would diminish the quality of residential uses and constitute a significant, non-mitigable impact of the Proposed Project (**Class I**).

TR.1-2 Please see response to comment GP.28-1.

SET # TR.2 MR. HOLZMEISTER

TR.2-1 Comment noted. Section A.6.4 has been expanded to include a discussion of future service to Truckee Donner Public Utility District.

SET # TR.3 MR. BRESLOW

TR.3-1 Comment noted. See revisions to Section B.3.4.6.2 of the Final EIR/S.

SET # TR.4 MARC NICOLET

TR.4-1 Comment noted. The beneficial impacts of the Proposed Project (**Class IV**) are summarized in the Impacts Summary Tables of the Executive Summary.

SET # TR.5 MS. THOMASON

TR.5-1 Please see response to comment GP. 28-1.

TR.5-2 The faults near Horizon Hills are existing features. The Proposed Project would not have any impact on them and the transmission line would be designed to accommodate faulting and earthquakes in accordance with standard geological and engineering practice for seismically active areas. See responses to comments GP.76-2, GP.09-7, and GP.122-2

TR.5-3 See response to comment TR.1-1.

SET # TR.6 MS. HART

TR.6-1 Please see response to comment GP.25-2.

TR.6-2 See response to comment PA.22-5. The comment regarding opposition to the Proposed Project is noted and will be considered by the CPUC and BLM in their decisions on the project.

SET # TR.7 MS. KIVI

TR.7-1 Comment noted. Please see response to comment GP.28-1.

SET # TR.8 MR. PARROTTO

TR.8-1 Please see response to comment GP.25-1.

TR.8-2 See response to comment GP.56-1.

SET # TR.9 MS. OROZCO

TR.9-1 Please see response to comment GP.25-1.

TR.9-2 Section A.6.4 has been expanded to include a discussion of future service to Truckee Donner Public Utility District. Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

TR.9-3 See response to comment GP.25-1.

TR.9-4 See response to comment GP.8-2.

TR.9-5 Many studies have been completed on EMF (see Section C.10.1.2.3), but there has not been a study of the effects of magnetic fields on children who have exposure while waiting for buses or for children who have a specific exposure for a short duration during the day.

SET # TR.10 MR. PYZEL

TR.10-1 Comment noted. Please see revisions to Section B.3.4.6.2 of the Final EIR/S.

SET # TR.11 MS. LORI BURKE

TR.11-1 Please see response to comment GP.25-1.

TR.11-2 Section C.5.1.1 of the Final EIR/S presents the utilities to be encountered by the Proposed Project. Section C.10.2.3.2 discusses the induced current potential of the Proposed Project.

SET # TR.12 MS. PIRKLE

TR.12-1 Comment noted.

SET # TR.13 MS. GILBERT

TR.13-1 Please see response to comment GP.25-1.

TR.13-2 See response to comment GP.25-1.

TR.13-3 See response to comment GP.25-2.

TR.13-4 See response to GP.8-2. There are no known effects of EMF on ground water.

TR.13-5 See responses to comments GP.41-24 and 135-13.

SET # TR.14 MS. DAZEY

TR.14-1 Please see response to comment GP.1-3B.

TR.14-2 See response to comment GP.52-3.

TR.14-3 The Piñon Pine Power Plant would be constructed approximately 15 miles away from the Proposed route of the Alturas Transmission Line. This distance between the two projects would limit the cumulative air quality effects from constructing both of these projects at the same time **(Class III)**. The cumulative impacts from the construction of the Tuscarora Gas Line and the Proposed Alturas Transmission Line were addressed in Section C.2.2.4.1 of the EIR/S.

TR.14-4 The screening analysis of the Tuscarora Natural Gas Pipeline Alignment Alternative includes a discussion of the system safety issues associated with a transmission line and pipeline in a joint utility corridor. As noted in Section B.3.4.1 of the Final EIR/S, these system safety issues can be mitigated through the use of thicker pipe coatings, installation of shielding and corrosion protection systems, or placing ground shields underneath structures. As discussed in Section C.10.2.3.3 of the EIR/S, SPPCo shall be required to incorporate California Public Utilities Commission General Order 95 and National Electric Safety Code requirements into the Project Construction, Operation, and Maintenance Plan.

TR.14-5 See responses to comments GP.8-2 and GP.52-2.

TR.14-6 Section C.8.2.2 has been revised in the Final EIR/S to include a discussion of the Proposed Project land use impacts on Rancho San Rafael Park. See responses to comments GP.8-2 and GP.52-2.

SET # TR.15 MR. SMYRES

TR.15-1 As discussed in Section B.3.4.6.2 of the Final EIR/S, there is an existing 345 kV line that traverses the northern Sparks and Reno area. This 345 kV line shares a corridor with an existing 120 kV line. See revisions to Section B.3.4.6.2 in the Final EIR/S for a discussion of the potential environmental impacts associated with replacing the Proposed Project with smaller lines in the urban areas.

TR.15-2 Please see revisions to Section C.8.2.2.

TR.15-3 See response to comment TR.14-6.

SET # TR.16 MR. WINGFIELD

TR.16-1 Please see responses to comments GP.8-2 and GP.52-2.

TR.16-2 See response to comment GP.10-1.

SET # TR.17 MR. MUCKENTHALER

TR.17-1 Please see response to comment GP.25-1.

TR.17-2 See responses to comments GP.1-3, GP.6-1, GP.8-2, GP.10-1, and GP.30-1.

SET # TR.18 MR. HERMAN

TR.18-1 Please see response to comment GP.25-1.

TR.18-2 See responses to comments GP.1-3, GP.6-1, GP.14-11, GP.30-1, and GP.109-15.

It should be recognized that the Applicant has proposed in its applications to come down from Alturas to Reno via Long Valley, largely on the basis of such factors as perceived cost-effectiveness, feasibility, and environmental constraints and permitting prospects. However, numerous alternatives to routing in the subject area are considered in the EIR/S, including various transmission alternatives for bringing power in from the east, including use of the referenced LADWP corridor (see Section B.3.4.6.2); generation alternatives (Section B.3.4.3); system enhancement alternatives (Section B.3.4.4); alternative transmission technologies (Section B.3.4.5); and an alternative route that would terminate at North Valley Road Substation after an approach from the north (Eastside Route 2, Section B.3.4.1). Further consideration has been given to the Nevada Alternative employing the LADWP corridor, Eastside Route 2, and other alternatives in this Final EIR/S document.

SET # TR.19 MR. ANDERSON

TR.19-1 Please see response to comment GP.25-1.

TR.19-2 See response to comment GP.28-1.

SET # TR.20 MR. ALBRIGHT

TR.20-1 Please see response to comment TR.14-6.

SET # TR.21 MS. MITCHELL

TR.21-1 Please see response to comment GP.52-3. As discussed in Section A.6.5, if growth in the Reno/Lake Tahoe is not realized as projected, the Alturas Transmission Line would not need to be in operation by the summer of 1997 (timeframe of expected failure of an existing SPPCo 120 kV line).

TR.21-2 Section E.3.3, Potential Growth-Inducing Effects, has been expanded to include a more thorough discussion of growth inducement impacts relating to the Proposed Project, including expansion of the Border Town Substation and future utility corridor ramifications.

TR.21-3 See responses to comments GP.14-17 and TR.21-1.

TR.21-4 See response to comment TR.14-6.

TR.21-5 See response to comment TR.14-6. The Proposed Project or EIR/S would not set a precedent for park planning or preserving urban open spaces. However, how federal, state, and local agencies decisions could set precedents for planning and decision-making on these issues.

See responses to comments GP.1-3, GP.14-1, and GP.30-1.

TR.21-6 Comment noted. Your concerns will be taken into consideration by the CPUC and BLM during their deliberation on the project.

TR.21-7 See response to comment TR.14-6.

TR.21-8 See response to comment TR.14-6.

TR.21-9 See response to comment TR.21-2.

SET # TR.22 MR. KIVI

TR.22-1 Section A.6.2.1 of the Draft EIR/S discusses the current demand on SPPCo's system, by sector. Sections A.6.8.3 and B.3.4.4 discuss the use of conservation to satisfy the objectives of the Proposed Project. Please see response to comment GP.1-3B.

TR.22-2 See response to comment TR.21-2.

TR.22-3 Section B.3.4.3 of the Final EIR/S discusses both the use of solar and geothermal energy as alternatives to the Proposed Project.

TR.22-4 See response to comment GP.28-1.

TR.22-5 See response to comment GP.25-1.

SET # TR.23 MR. OPENCRANTZ

TR.23-1 Comment noted. As proposed, SPPCo is planning on using corten steel for the structures (resultant rust-like finish) to minimize the visual impacts of the Proposed Project.

SET # TR.24 MS. TOLENO

TR.24-1 The commenter is concerned with wind noise in the Horizon Hills subdivision near Angle Point XØ8, east of Peavine Peak. This response can be generally applied to other residential areas along the proposed and alternative segments. Whistling requires creation of a narrow gap in dense materials through which air passes and sets the mass into vibration (for example the gap between a reed and the mouthpiece in a clarinet, or the larynx plus vocal chords in the human throat). Physically this cannot occur when wires are located in open space. Ringing can result when a wire is induced to vibrate at its natural frequency (referred to like a "harp" in one comment). This can physically happen to power lines strung between transmission poles or towers. Power companies apply commercially available vibration damping systems when this can occur. The remedy consists in stringing weights hung at appropriate intervals along the power lines. Following normal engineering practice, SPPCo would apply damping systems, if winds in any area would induce vibration of the power lines. As a result significant ringing would not occur.

TR.24-2 A considerable amount of effort will be expended to reduce the impacts of construction. Mitigation Measure G-11 outlines some of the measures to be undertaken. A comprehensive Soil Conservation and Erosion Control Plan would be developed to further reduce the adverse impacts. These plans would include having field environmental monitors to observe construction procedures and with the authority to enforce dust and erosion control.

TR.24-3 See response to comment GP.2-2.

TR.24-4 See response to comment GP.28-1.

TR.24-5 See response to comment PA.2-3.

H.6 RESPONSES TO COMMENTS FROM SIERRA PACIFIC POWER COMPANY (APPLICANT=A)

SET # A.1 SIERRA PACIFIC POWER COMPANY 180

A.1-1 Please see revisions to Section A.6.2.

A.1-2 See revisions to Section A.6.2.

A.1-3 See revisions to Section A.6.2.

A.1-4 See revisions to Section A.6.2.

A.1-5 Mitigation Measures L-8 and L-13 were based on a number of factors, only one of which is EMFs. The 300-foot setback was recommended to reduce the significant degradation of the quality of residential uses. However, since the CPUC and BLM cannot impose setbacks on future projects that are not under their jurisdiction, it will be up to the jurisdictions traversed by the Proposed Project to adopt Mitigation Measure L-13. Mitigation Measure L-13 is only a recommended measure for local jurisdictions. Also, please see response to comment GP.61-1.

A discussion of EMFs is included in the Land Use Section of the EIR/S because the presence of EMFs from the project facilities on or near residential property is one factor which would contribute to degradation of the quality of residential uses.

See response to comment GP.132-4 regarding impacts to property values.

A.1-6 Comment noted. Mitigation Measure S-1 has been modified in the Final EIR/S.

A.1.7 See revisions to Sections A.6.3.3 and B.3.4.2 of the Final EIR/S.

A.1-8 Portions of Section C.3.2.1.1, Significance Criteria, have been revised to clarify the significance criteria with respect to magnitude of impact. No mitigation measures are applied to non-significant impacts. See revised Mitigation Measures B-3 and B-5 in the Final EIR/S. Also see the revised Table C.3-10, which no longer includes plant communities and special status species that have non-significant (Class III) impacts (e.g., juniper woodland, big sagebrush scrub, *Hackelia cusickii,* etc.). The corresponding text has also been revised.

No tree removal mitigation has been proposed for biological impacts. Some juniper maintenance has been proposed for the Alturas Substation near Devils Garden, but only to the extent that it would mitigate for visual impacts (see Mitigation Measure V-5).

A.1-9 The more-detailed geologic and geotechnical studies called for in Mitigation Measures G-2 through G-7 and G-14 are standard requirements for any important facility in an environment with active and potentially active faults, significant seismicity, rugged terrain, and potentially adverse soil conditions. The required investigation should be conducted in accordance with good engineering practice and in accordance with applicable federal, state (California and Nevada), and local geological and engineering procedures and standards. The discussions in the Draft EIR/S provide a good starting point by providing approximate fault locations, seismicity, topographic maps, and information on expansive and corrosive soils.

There is no need for separate detailed reports for individual structures; a single comprehensive geological and geotechnical engineering report for the entire project would be adequate. Industry data on the strength of the loads that the proposed structures can withstand should be provided and compared to the acceleration and/or velocities generated by the maximum credible earthquakes on specific faults in proximity to the Proposed Project. The intent is to document the appropriate parameters to show that the project is adequately designed.

Efforts should be made to keep structures from straddling faults if possible. However, as you have correctly noted there are no specific laws that require this and if it proves to be an unacceptable hardship, some structures within fault zones might be acceptable. Generally, fault zones can be easily avoided by strategic selection of structure locations, because the faults are generally quite narrow compared to structure spacing. Therefore, only a few structures, if any, would need any special attention and it is these structures that would need specific attention in the subject report.

Likewise specific tests at each structure may not be needed to adequately account for expansive or corrosive soils. Most of the structures within the clayey deposits of the Madeline Plains, for example, would probably have similar foundation characteristics, so only a few representative engineering tests would be required to characterize the hazard and quantify the risks.

A.1-10 Comment noted. See response to comment A.1-9.

A.1-11 See response to comment A.1-9. The discussions in the EIR/S attempt to provide some guidelines within which to safely design and construct the Proposed Project. As indicated by the

Applicant in this comment, the California criteria for Earthquake Fault Zones (i.e., formerly Alquist-Priolo Special Studies Zones) are for buildings with human occupancy in excess of 2000 man-hours. As such, these criteria do not apply to transmission line structures.

A.1-12 The Applicant's suggested revision is basically correct and adequate. However, the mitigation measures will remain separate items as written in the EIR/S because as separate entries they provide for easier interpretation by the general public and other agencies not familiar with seismic design issues.

A.1-13 As discussed in response to comment A.1-9, separate stability investigations are not required at each individual structure or road. As stated in the referenced response, the mitigation measure is provided to help ensure that slope stability studies are done where appropriate. There are certain areas where undercutting adverse out-of-slope bedding could induce slope instability and other areas which have experienced natural failures. These could already be near the state of failure. The mitigation measure is meant to ensure that such areas are recognized and considered in the design and placement of structures and access roads.

A.1-14 See response to comment A.1-9. Mitigation measure G-14 is not meant to require 700 evaluations, one at each site. The main purpose of the measure is to call out the fact that expansive soils are known in the area and should be considered in project design. If such soils are not a problem to the integrity of the structures then this can be easily shown with simple calculations and only representative soil tests. These are fairly routine and standard geotechnical procedures.

A.1-15 The CPUC and BLM, as Lead Agencies, have permitting and monitoring responsibilities for the Proposed Project. As such, the review and approval of specific plans can be allocated to another responsible agency by the Lead Agencies, if they so deem appropriate.

A.1-16 CDFG has prepared a letter dated July 3, 1995 in response to the Project Applicant's comments on the analysis of project impacts on Wildlife Conservation Areas (WCAs) presented in the Draft EIR/S. The responses to comments below are extracted from this comment letter.

The letter does not explain how degradation factors were calculated for existing conditions on WCA land. The letter infers that wildlife habitat value, constraints to public use and enjoyment, and constraints to land and habitat management were considered in assigning degradation factors.

With regard to the comment that all of the WCA parcels do not have equal habitat or wildlife management value, CDFG indicates that the Project Applicant does not provide any support for this statement, and that habitat quality was not the only factor considered in calculating a degradation factor for a specific parcel.

To address the comment that significant wildlife values would remain in the ROW after the Proposed Project is constructed, CDFG indicates that the main CEQA issue is the impact of the project on all values and uses of the WCAs, not the remaining wildlife habitat values. Furthermore, CDFG explains

that the fact that wildlife habitat values will remain in the ROW after project construction does not lessen the need for mitigation for the degradation of wildlife habitat, land use changes that would affect public use and enjoyment of the areas, and CDFG's ability to safely and effectively manage their public trust lands.

With regard to the comment that compensation for impacts to the Doyle WCA would not be required because some parcels of this WCA will be exchanged with the BLM for other land, CDFG responds that if the Department owns the parcels at the start of project construction, mitigation for impacts to this land would be required. If the parcels are transferred to BLM before the start of project construction, compensation for impacts to the land would be negotiated between the BLM and the Project Applicant.

A.1-17 Please see revisions to Table B-2. Figure B.2-3B has been added to the Final EIR/S to illustrate the double circuit, 230 kV H-frame structure.

A.1-18 The suggested comment was not inserted, since the referenced paragraph does not contain seven sentences.

A.1-19 The noted revision has been incorporated into the Final EIR/S.

A.1-20 As discussed in Section B.3.4.5 of the Final EIR/S, the main advantage of relocating the majority of the Proposed Project alignment within or adjacent to the proposed Tuscarora Natural Gas Pipeline Project right-of-way would be the minimization of impacts relating to construction activities; however, the visual impacts would be significantly intensified since if the Proposed Project shared the Tuscarora Pipeline alignment for its entire length, the transmission line would parallel U.S. 395 for approximately 75 continuous miles. The intensification of visual impacts was a primary reason this alternative was eliminated from further consideration.

A.1-21 Please see revisions to Table C.3-2 in the Final EIR/S. The representative wildlife species and habitats shown in the table were chosen based on field observations and on CDFG's *California's Wildlife* publication (Zeiner, et al, 1990). Also see response to comment A.1-29 regarding the western yellow-billed cuckoo.

A.1-22 See revised Table C.3-2 in the Final EIR/S.

A.1-23 As stated in the EIR/S, other plant taxa were addressed as special status species "if they have been recently identified in California or appear to be highly restricted in their range or abundance." Due to the lack of previous studies in the project vicinity, the actual abundance or rarity of some CNPS List 3 and 4 species was not well documented. Other species were included if they were recent additions to the California flora. Rare plant survey guidelines adopted by the California Department of Fish and Game and the California Native Plant Society (CNPS) recommend that "botanical surveys that are conducted to determine the environmental effects of a proposed development should be directed to all rare, threatened, and endangered plants and rare plant communities" (Skinner and Pavlik, 1994). CNPS recommends that List 3 and 4 plants "be evaluated for consideration during preparation of environmental

documents relating to CEQA" because some of these plants may meet the definition of a rare plant as described in Section 15380 of the CEQA Guidelines, Section 1901 (Chapter 10) of the Native Plant Protection Act, or Secs. 2062 and 2067 of the California Endangered Species Act (Skinner and Pavlik, 1994).

A.1-24 More than 80 special status plant species are known from the general vicinity of the project area. Twenty special status plant species were found within the project study area for the proposed 165-mile transmission line. Thirteen of the twenty special status plant species observed in the project study area satisfy the definition of a rare, threatened, or endangered species as defined by Section 15380 of the CEQA Guidelines, Section 1901 (Chapter 10) of the Native Plant Protection Act, or Secs. 2062 and 2067 of the California Endangered Species Act. More than 140 populations of special status plants were documented in the study area. These numbers may or may not be comparable to other projects of similar length in California but it would be incorrect to state that there are "very few special status species" present. The project vicinity is relatively undeveloped but contains a number of habitats unique to the region and unique to California and Nevada.

A.1-25 Table C.3-3 reflects the most recent recommendations of CNPS made subsequent to the Fifth Edition of the CNPS Inventory of Rare and Endangered Vascular Plants (Skinner and Pavlik, 1994) and is correct (Lis, 1995). Table C.3-3 was developed based on data from Gary Schoolcraft who is a BLM botanist for the Susanville District, Richard Lis who is a CDFG botanist with Region I, Glenn Clifton who is a botanist with the Tuscarora Project, and James Morefield who is a botanist with the Nevada Natural Heritage Program.

The following species were listed in Table C.3-3 because existing information indicated that they satisfied the criteria for rare, threatened, or endangered species as expressed in Section 15380 of the CEQA Guidelines:

- *Alisma gramineum*
- *Astragalus agrestis* (now treated as CNPS List 2)
- *Astragalus lentiginosus* var. *chartaceus* (syn: *A. l.* var. *platyphyllidius*) (now treated as CNPS List 2)
- *Atriplex gardneri* var. *falcata* (now treated as CNPS List 2)
- *Carex atherodes*
- *Cleomella hillmanii* (now treated as CNPS List 2)
- *Downingia laeta*
- *Eriogonum collinum* (now treated as CNPS List 4, taxon was omitted accidentally from Jepson Manual)
- *Lomatium foeniculaceum* var. *macdougalii* (now treated as CNPS List 2)
- *Lupinus uncialis* (now treated as CNPS List 2)
- *Penstemon neotericus*
- *Polygonum polygaloides*
- *Psoralidium lanceolatum* (now treated as CNPS List 2)
- *Sphaeralcea grossulariifolia*
- *Stanleya viridiflora* (now treated as CNPS List 2)
- *Thelypodium milleflorum* (now treated as CNPS List 4)
- *Triteleia grandiflora* ssp. *howellii*
- *Tripterocalyx crux-maltae* (now treated as CNPS List 1B).

Current CNPS List status is included in parentheses (Lis, 1995).

Issues regarding the inclusion of CNPS List 3 and 4 species are addressed in the response to comment A.1-23 . The following species purported to be List 3 or 4 in the comment are now treated as CNPS List 1B or List 2:

- *Antennaria flagellaris* (CNPS List 2)
- *Scutellaria holmgreniorum* (CNPS List 1B).

The status of the following species are correct in Table C.3-3 based on changes made since the publishing of the Fifth Edition of the CNPS Inventory (Lis, 1995):

- *Arnica sororia* is now treated as a CNPS List 4 species
- *Astragalus pulsiferae* is now treated as a CNPS List 4 species
- *Ivesia baileyi* var. *baileyi* is correctly listed as a CNPS List 2 species
- *Mimulus pygmaeus* is now treated as a CNPS List 4 species.

Table C.3-3 in the Final EIR/S has been corrected to show that *Oryctes nevadensis* is on CNPS List 1B species. This table has been retained in Section C.3 because it is critical to the description of the project setting.

A.1-26 The text has been changed in the Final EIR/S as suggested.

A.1-27 Suggested changes have been reviewed and Table C.3-4 has been revised accordingly in the Final EIR/S.

A.1-28 The referenced sentence has been corrected. Impact 13 in Section C.3.2.2.3 acknowledges this benefit to raptors. However, the benefit is offset by the significant adverse impacts to prey species such as sage grouse, greater sandhill cranes, and pygmy rabbits.

A.1-29 Please note that the western yellow-billed cuckoo was included in the USFWS list of species to be included in the EIR/S. Therefore, although there are no existing records of this species occurring in the project area, the species must be addressed in the document to comply with NEPA.

A.1-30 The following sentence has been deleted from Section C.3.1.3 of the Final EIR/S: "The Corps' regulatory program has interpreted Section 404 to include all adverse impacts to waters of the United States."

A.1-31 The text describes the acreage conditions for nationwide permit (NWP) 26 which applies to discharges of fill into isolated waters and headwaters, which includes most of the wetlands found in the project area. Other nationwide permits that are applicable to this project include NWP's 18, 25, and 33. The text of the Final EIR/S has been revised to address the additional NWP's that are possibly applicable to the Proposed Project.

NWP 18 applies to minor discharges of less than 25 cubic yards and requires submission of a delineation and notification of the Corps in advance of the activity. NWP 25 applies to discharges of concrete and rock placed into forms used for transmission line footings and does not have an acreage limit or maximum discharge volume. NWP 33 applies to temporary structures and fill necessary for construction activities provided that any associated permanent facilities have already been authorized by a Corps permit. NWP 12 does not apply to this project since it applies only to utilities placed underground such as gas pipelines or underground electrical lines.

A.1-32 The referenced section has been clarified. Please refer to response to comment PA.23-71 and the corresponding revisions to the Final EIR/S.

A.1-33 See response to comment A.1-32.

A.1-34 See response to comment A.1-32.

A.1-35 Please see revisions to Table C.3-8.

A.1-36 Each of the ten species listed were observed and documented in the project study area during field surveys in 1994. However, the Proposed Project design as described in Part B of the Final EIR/S would not affect the known populations of these species. Please also refer to the response to comment PA.23- 73..

A.1-37 Please refer to response to comment PA.23-73.

A.1-38 Table C.3-9 merely shows the vegetation resources that could potentially be impacted by the Proposed Project. Each of these resources was evaluated for significance in Section C.3.2.2.2. Table C.3-10 has been revised to summarize *significant* vegetation impacts. Juniper woodland and big sagebrush scrub, along with some of the special status plants, have been removed from this table since impacts to these resources were classified adverse, but not significant (Class III).

A.1-39 The text has been changed as suggested.

A.1-40 See response to comment PA.23-71.

The text has been changed in the Final EIR/S to allow a more reasonable recovery period as recommended. A 50-year recovery period provides incentive for onsite restoration by raising the threshold used to categorize temporary versus permanent impacts. This does not change the area of permanent and temporary impacts documented in the EIR/S because permanent impacts were only identified for impacts caused by permanent facilities such as substations, structure footings, communications facilities, and new permanent access roads.

A.1-41 Specifics of how compensation moneys are distributed and used are outside of the scope of the EIR/S and shall be subject to negotiation between the Applicant and the agencies (i.e., BLM, CPUC, CDFG, USFWS, and other responsible agencies).

For impacts to special status wildlife species which occur on federally held lands and managed for the people of the U.S., mitigation shall be developed with the appropriate management agency, i.e., BLM.

A.1-42 Please refer to Section C.3.2.2.1. The 50-year period of compensation is an essential component of the compensation formula which reduces the total area of compensation proportional to the number of years the compensation is provided. Therefore, if offsite compensation is provided for only one year the area will be 50 times greater than if the compensation is provided for 50 years. One way to look at the formula is:

$$Ac = (Ai \times Y) \times (Pi/Tc)$$

where Ac is the acres of compensation, Ai is the acres of impact, Y is the habitat yield ratio, Pi is the duration of impact, and Tc is the duration of compensation. In this arrangement of the formula it is more evident that (Pi/Tc) is the ratio of the duration of the impact relative to the period of compensation. In most cases it was assumed that the duration of impact was roughly 15 years based on the average estimated recovery period for vegetation in the region. The period of compensation is based on the premise that the habitat value return on the acquired lands diminishes with time. The period of compensation was set at 50 years for the Proposed Project based on the estimated point at which most of the potential return on habitat value from the offsite compensation would be exhausted. This 50-year marker is a function of the period of time required for most impacts to plant communities and special status species habitats to fully recover and the threshold after which the enhanced value of the acquired parcels would cease to increase significantly.

A.1-43 Comment noted. The article by Wendy Brown (Brown et al., 1993) was submitted to the Wildlife Society in late 1993. It is still awaiting publication.

A.1-44 The referenced paragraph has been removed as suggested. However, please note that "collision" as used in this EIR/S and in most collision studies implies bird fatality as a result of the collision.

A.1-45 This sentence has been revised in the Final EIR/S.

A.1-46 This sentence has been deleted in the Final EIR/S.

A.1-47 A 10-year growth envelope for western juniper (*Juniperus occidentalis*) is approximately 3 feet in the project area and the species typically does not exceed 30 feet tall (Simonson, 1994). A 10-year growth envelope for yellow pine (*Pinus jeffreyi*) is approximately 4 feet in the project area and typically does not exceed 50 feet (Simonson 1994). A 10-year growth envelope for white fir (*Abies*

concolor) is approximately 5 feet in the project area and the species typically does not exceed 70 feet tall (Simonson 1994).

A.1-48 The Applicant's incentive to minimize impacts lies in the potential to reduce the amount of compensation required upon the completion of construction. It is not necessary to quantify the basal area of the impact (dbh) since compensation will be calculated based on the area of impact. Trees that will be removed to accommodate the 10-year growth envelope will generally be greater than 4 inches dbh and clearing would not be random so the value of a 4-inch dbh criteria is not recognized.

A.1-49 Low sagebrush scrub in the project study area is one of the least degraded plant communities. This plant community is associated with at least two special status plants, Henderson's lomatium (*Lomatium hendersonii*) and some populations of Holmgren's skullcap (*Scutellaria holmgreniorum*), and is important summer foraging habitat for pronghorn antelope and other wildlife species. The magnitude of impacts to this plant community relative to its distribution in the region and its potential sensitivity are the basis of the finding of significance.

A.1-50 Comment noted. When the word "will" is used in this section to describe project impacts, no inference is being made as to absolute magnitude of impacts. All acreage values given in the Final EIR/S should be considered rough estimates only. Actual values would be determined during the preconstruction surveys, and would be addressed in the Final Mitigation Monitoring, Compliance, and Reporting Plan (in preparation) to be approved by the responsible agencies.

A.1-51 Sagebrush/bitterbrush plant communities are relatively uncommon in the project study area, but are locally common near the southern margins of Honey Lake Valley and in Long Valley. This plant community is important winter forage habitat for pronghorn antelope and mule deer. Impacts to sagebrush/bitterbrush are considered significant due to its value as winter forage for wildlife, the difficulties in restoring this community, and the relative magnitude of the potential impacts.

A.1-52 Please refer to the response to comment A.1-38.

A.1-53 Chenopod scrub in northern California is limited to the Lassen and Modoc counties. Impacts to this plant community are considered significant based on the magnitude of the potential impacts and the uniqueness of this plant community in the region.

A.1-54 The Final EIR/S includes discussions of silver sagebrush scrub and lance-leaved scurf-pea (*Psoralidium lanceolatum*).

As stated in the response to comment PA.23-79, the affected acreage values were calculated by overlaying Proposed Project design components on field maps of the plant communities and special status plant populations. The Applicant provided estimates of the number of structures and distance of overland travel that would occur in areas with sensitive biological resources. An example of the data used to calculate impacts to special status plants is provided in Table E-3 of Appendix E.1.

Approximately 8.52 acres of habitat supporting *Lomatium hendersonii* will be impacted by the project during construction. Most of this impact would be caused by disturbance at structure locations.

A.1-55 Please refer to the revised Mitigation Measures B-3 and B-5 in the Final EIR/S.

The offsite compensation required for permanent loss of plant community habitat due to substations, communications facilities, and structure footings is 65.49 acres (Table C.3-10 in the Draft EIR/S). However, an additional area of 83.51 acres would be reqired for losses due to permanent new access roads. The 149 acres cited in the comment is the total area of offsite compensation for permanent loss of plant community habitat computed by taking the sum of 65.49 acres and 83.51 acres listed in columns 7 and 9 of Table C.3-10. No discrepancy between text and table exists.

However, juniper woodland, big sagebrush scrub, and four special status plants are not considered significantly impacted vegetation resources requiring offsite compensation. Table C.3-10 and the corresponding text have been revised accordingly in the Final EIR/S (as Table C.3-11). (Note: The Final EIR/S also contains a more refined delineation of plant communities impacted by the Proposed Project; Table C.3-11 includes these plant communities.)

A.1-56 The text has been changed as suggested.

A.1-57 Table C.3-11 has been changed to remove offsite compensation for Cusick's stickseed (*Hackelia cusickii*), Raven's lomatium (*Lomatium ravenii*), Pine Creek evening primrose (*Camissonia boothii* var. *alyssoides*), and Nelson's evening primrose (*Camissonia minor*) since impacts to these CNPS List 4 species are not considered to be significant according to the CEQA Guidelines. The corresponding values for offsite compensation in Mitigation Measures B-3 and B-5 have been changed.

A.1-58 The Federal status of Holmgren's skullcap (*Scutellaria holmgreniorum*) is related to the taxonomic revision of this taxon published in the Jepson Manual (Hickman, 1993). The Jepson Manual placed Holmgren's skullcap with a ubiquitous taxon: *Scutellaria nana*. This taxonomic change was not embraced by CNPS and recent field work has led to a reconsideration of the species' status. Holmgren's skullcap is currently being treated as a CNPS List 1B species by CDFG and CNPS (Lis, 1995). A finding of significance for impacts to this species is warranted based on its restricted distribution, specific habitat requirements, unknown sensitivity to disturbance, and the potential magnitude of the project's impacts.

A.1-59 See response to comment A.1-57 and the text for lance-leaved scurf-pea added to the Final EIR/S.

A.1-60 The text refers to the total offsite compensation area required for overland travel impacts (Column 8). Column 4 of Table C.3-10, which the commenter is referring to, shows the acres of onsite impact. The acres of impact for individual plant communities, presented on the previous page of the Draft EIR/S, are merely rounded values of the numbers given in Table C.3-10. However, please see revisions to the table (Table C.3-11) and text in the Final EIR/S.

A.1-61 See response to comment A.1-57 and the revised text for Impact 4 in the Final EIR/S. Doublet *(Dimeresia howelii)* and lance-leaved scurf-pea *(Psoralidium lanceolatum)* remain as special status species significantly impacted by overland travel disturbance.

A.1-62 The 4 acres given in the Draft EIR/S text was in reference to the total shown in column 8 of Table C.3-10, not the total in column 4 as suggested by the comment. However, the amount of compensation has been changed to reflect the revision of Table C.3-10 in response to comment A.1-57. Please note that this amount refers to column 8 of Table C.3-10 which shows compensation totals, not to column 4 which shows acreage impacted. The revised table is presented as Table C.3-11 in the Final EIR/S.

A.1-63 See revised Table C.3-11 in the Final EIR/S, updated based on the most recent information provided by the Applicant.

A.1-64 The sentence has been deleted from Mitigation Measure B-6.

A.1-65 The Applicant will not be responsible for controlling existing noxious weed populations. Mitigation Measure B-8 requires the Applicant to prevent the dispersal of non-native weeds beyond their existing distribution in the project area. Introduction of non-native species is a significant impact under CEQA as stated in Appendix I of the CEQA Guidelines.

A.1-66 It is unlikely that during repeat overland travel trips that each vehicle will proceed in the exact two-track path each time. A number of paths within a 15-foot wide corridor is more likely. However, all areas will be resurveyed after construction has concluded to assess actual impacts. Mitigation Measure B-3 and B-5 have been revised to include post-construction surveys of areas of impact.

A.1-67 Table C.3-6a has been added in the Final EIR/S to include a summary of the big game habitats present in each segment. In addition, Table C.3-13a has been included which shows summary totals of impacts to these habitats due to loss of habitat from structure locations (temporary and permanent), overland travel, and permanent access roads. Please refer to these tables.

The column in Table C.3-13 labeled "Indirect Impacts" includes habitats or resources which occur within the buffer distances established to protect special status species from indirect impacts. For example, raptor nests such as golden eagle nests which are known to occur within 0.5 mile of the proposed right-of-way are shown in this column. The buffer zone of 0.5 mile was established through coordination with CDFG biologists. Buffer zones which apply to the species which occur in the project area are shown in Table C.3-14.

Distributions of wildlife species were determined based on range maps available through the BLM and the California Department of Fish and Game. In some instances distribution maps were obtained from district biologists. In addition, field observations were documented and used to verify and augment the

distribution maps whenever possible. Habitat quality was considered and evaluated in the field. In some locations the Proposed Project area includes areas where habitat is degraded and the dominant cover is composed of non-native plant species. Calculation of offsite mitigation includes consideration of existing habitat quality and the quality of habitat to be aquired; habitat of equal or better quality will be aquired to compensate for loss of or disturbance to habitat as a result of the Proposed Project.

Acreage calculations shown in Table C.3-13 were established based on the various construction activities anticipated including blading, structure construction, and overland travel associated with both gaining access to the project area and line stringing. Also, the footnotes which follow the table indicate the types of activities considered in each impact category.

A.1-68 Mitigation for mule deer habitat as described in this section are intended to compensate for damage to habitat incurred during the construction period which will remain in evidence for a period of time until the area recovers from the disturbance. For example, although the deer will not be present in the winter range during the construction period, impacts to their habitat due to overland travel will be apparent during the winter period when the deer are in fact using the habitat.

A.1-69 Table C.3-12 has been revised in the Final EIR/S (as Table C.3-13) and corresponding text has been revised accordingly, if necessary.

A.1-70 Impacts described here would preclude use of the habitat during the kidding period. Until that habitat is available to the pronghorn for use in its pre-construction condition, mitigation is required. Please note that this is a condition applied by the CDFG. See also response to comment A.1-68.

A.1-71 See response to comment A.1-69.

A.1-72 See response to comment A.1-69.

A.1-73 Comment noted. Mitigation Measure B-14 in the Final EIR/S incorporates the comment's suggestion.

A.1-74 See response to comment A.1-69. Regarding seasonal use of habitat by sage grouse, even if construction is timed to avoid the grouse habitat during breeding or brood rearing, loss of this habitat type for later use as forage or cover is still considered a significant impact according to Section 15065 and Appendices G and H of the CEQA Guidelines.

A.1-75 The temporary loss of vegetation due to overland travel in big game winter, kidding, and migration habitats is considered a significant impact in the Final EIR/S because of the depleted nature of big game forage in these seasonal use areas. The winter, kidding, and migration periods are specific seasonal aspects of big game ecology during which access to forage is critical. In addition, these habitat types are specific and occur in limited quantities during critical life stages. Therefore, loss of these habitats is considered a significant impact.

A.1-76 Comment noted. Unoccupied nest sites would not require buffer zones. Preconstruction surveys (discussed in Mitigation Measures B-14) will be conducted to identify current-year occupied nests and to establish buffer zones.

A.1-77 See response to comment A.1-69.

A.1-78 The equation presented addresses only the impacts to this species. Benefits to the Swainson's hawk as a result of the Proposed Project will include addition of perches and nesting structures in areas which currently do not support trees. Within the proposed transmission line ROW this includes portions of Segments Q, P, O, L, K, J, and E. But while there are some benefits in providing additional perches in an otherwise open habitat, these benefits are not significant in the context of the overall project.

A.1-79 See response to comment A.1-73.

A.1-80 Attendance at leks is determined by environmental factors such as temperature and day length. Sage grouse have been observed at lek locations within the project area as late as May 21 (Hall, 1994.)

A.1-81 The restriction on overland travel in pygmy rabbit habitat has been removed based on conversations with CDFG biologists and Bob Williams. In addition Mitigation Measure B-12 has been modified. Use of existing roads will occur whenever possible. Focused surveys to identify den complexes within 300 feet of construction areas will be required.

A.1-82 The slower the vehicle speed, the more likely sensitive species in the vehicle's path will be seen and the less likely they would be hit. In many areas, vehicles will not be able to travel much faster due to existing road conditions. Therefore, a 15 MPH speed limit on unpaved access roads and off-road areas will be enforced, except in areas where fugitive dust conditions or sensitive wildlife (identified by biological monitors) are present. In sensitive wildlife areas and in areas where fugitive dust conditions are identified (dust hinders visibility, making wildlife more difficult to see and avoid), the speed limit will be 10 MPH.

A.1-83 The text has been changed as suggested.

A.1-84 Comment noted. The text has been modified as suggested. See also Appendix A.1, which includes an analysis of the access roads that will not be reclaimed.

A.1-85 Comment noted. Perching deterrents occupy hazardous locations at the substations forcing birds to perch at locations where they are safe from electrocution. This method is more beneficial than using wider clearances because raptors would not use the substations as perches and prey heavily upon adjacent wildlife. In addition, by deterring raptors from using substation structures as perches, the raptors are in effect motivated to perch at locations away from the potential dangers of substations and transmission lines overall. Therefore, perch deterrents will be used at the substations.

A.1-86 The referenced text has been deleted from the Final EIR/S.

A.1-87 The text has been changed accordingly.

A.1-88 Please refer to Appendix E.1 for discussion of the offsite mitigation for greater sandhill cranes. Even using the non-rounded numbers provided in the appendix, the acreage calculation comes to approximately 348. However, final offsite compensation acreage requirements will be determined based on actual impacts after construction.

A.1-89 Movement by sage grouse during the breeding period is based on habitat suitability. For instance, if appropriate nesting habitat occurs adjacent to the sage grouse lek, hens may nest within close proximity of the lek location. However, if suitable nesting habitat occurs several miles away from the lek, hens are known to travel to these areas even if they are a distance from the lek. The Final EIR/S states that the grouse may nest up to 8 miles away from the lek. This is based upon data collected by Clait Braun in Colorado. However, conversations with biologists at the Elko office of Nevada Division of Wildlife confirm the average nest is within 2 miles of the nearest lek. Due to the fact that this information was gathered in localities within the Proposed Project area, the information has been incorporated in the Proposed Project in the following manner:

Segments J, K, C, and ESVA would place transmission line structures in sage grouse habitat which currently does not support trees. Within these segments perch guards would be required wherever the transmission line occurs within 4 miles of a lek location. Segments E, M, N, and L occur in areas where structures or trees are currently present, or where the line of sight is broken by topography. These Segments would require perch guards where the transmission line would cross within 2 miles of a lek location.

A.1-90 Unique geologic formations are unusual rocks, hills, and canyons of scenic beauty and public interest such as the Red Rocks Scenic area. The suggested revision to Mitigation Measure G-1 does not appear to offer any significant benefits so the existing text will remain unchanged.

A.1-91 CEQA and NEPA require that impacts to mineral resources be evaluated and mitigated. As discussed in the EIR/S, an access road through a potential mineral deposit or construction of a facility that would prevent access to a mineral deposit would be a significant impact. Although every reasonable effort was made during the preparation of the EIR/S to identify all mineral resources, it is possible that some small claims may be unrecognized or may be filed prior to construction. State geologic agencies such as CDMG and NBMG are the appropriate agencies to assist the Lead Agencies in ensuring that NEPA and CEQA criteria are fulfilled.

A.1-92 There are several levels of emergency preparedness planning; Mitigation Measure G-10 is not referring to the general public aspects that would come under the auspices of FEMA or state emergency agencies. The purpose of the mitigation measure is to ensure that the Applicant is aware of and considers the ramifications of an ash fallout on the Proposed Project. Although exceedingly infrequent, ash fallouts are inevitable events that cannot be prevented. Such ash falls can become very

dense and sticky if accompanied by precipitation or if they occur during the winter. Ash buildups on power lines could impose loads that could destabilize power lines or cause arcing between power lines or transformers. It may not be safe or even physically possible for repair personnel to drive during ash falls. An ash fall could occur during operation of the project. A major ash fall could provoke a complex series of events that could impact the Proposed Project in many ways, perhaps some of them totally unforeseen. The mitigation measure is meant to ensure that the Applicant is aware of the various potential problems so that plans can be made in advance. These are complex and esoteric issues that are beyond the scope of an EIR/S and which can only be properly evaluated by engineers totally familiar with power supply systems. Perhaps informal conversations with the Applicant's counterpart in the Pacific Northwest who experienced the Mount Saint Helens eruption in 1980 would provide the needed information.

A.1-93 Mitigation Measure G-12 has been revised in the Final EIR/S as suggested.

A.1-94 Mitigation Measure G-13 has been changed in the Final EIR/S.

A.1-95 See responses to comments PA.21-13, PA.21-14, and PA.21-15. The California Energy Commission has requested that the paleontologic mitigation measures be considerably expanded to include a full-scale pre-construction analysis and construction monitoring by certified paleontologists. These types of plans have become relatively common for utility construction in California. Additional review of published documents and discussion with paleontologists in response to their comments has indicated that there may be an unappreciated potential for important vertebrate fossils. Based on our own experience in the region and on our corridor reconnaissance, we do not feel that the probability of encountering fossils is high enough to warrant a full-scale program like they suggest, but the available data do indicate the need for some degree of monitoring and this shall be developed in a Paleontologic Data Inventory and Sampling Plan.

A.1-96 The Mill site does comprise about 8 acres and, therefore, the text of the first sentence in Section C.6.3.9.1 will be modified by adding the number "8."

A.1-97 Long Valley Creek, just north of the Border Town Substation at about MP 150.5 to 150.8, is a montane meadow wetland, but not a perennial stream. Long Valley does not become a perennial stream until farther north where it merges with runoff from Ball Canyon near MP 140.

The comment about Alternative Alignment WCFG not crossing Long Valley Creek is correct. Section C.7.3.7 of the Final EIR/S has been revised accordingly.

A.1-98 The precise identification of springs and shallow aquifers is best done after structure locations are more final and the need for blasting better quantified. It may turn out that very little blasting is required and thus the effort of identifying every spring would be frivolous. Identification of springs and wells at risk shall be part of the Blasting Plan required by Mitigation Measures G-8 and H-8; that is the reason for including the requirement of consultation with qualified geologists and/or hydrologists and water resources agencies as part of the mitigation measure.

A.1-99 Table C.7-2 has been changed as indicated in the Final EIR/S.

The exact crossing location is important as to whether structures would be within the floodplain. The presently designated location of the corridor as shown on Map 26 of 33 is at a bend in the creek bed which is why the spanning distance (1,400 feet) is greater than the average distance between structures (1,200 feet). Moving the crossing location only a couple hundred feet decreases the width of floodplain to only 700-800 feet, and therefore the crossing could be made without a structure in the floodplain.

A.1-100 The text has been changed in the Final EIR/S as suggested.

A.1-101 Mitigation Measure H-4 has been modified in the Final EIR/S.

A.1-102 Mitigation Measure H-4 has been modified in the Final EIR/S.

A.1-103 The referenced text has been changed as suggested in the Final EIR/S.

A.1-104 The text has been changed in the Final EIR/S as noted in the comment.

A.1-105 BLM provided the information on the unnamed mountain bike trail crossed by Segment A. The fact that the mountain bike trail has not been officially designated by the BLM and does not have a name does not diminish its recreational value or importance.

A.1-106 Text has been deleted in the Final EIR/S as suggested.

A.1-107 Text has been changed in the Final EIR/S as suggested.

A.1-108 Text has been changed in the Final EIR/S as suggested.

A.1-109 Text has been changed in the Final EIR/S as indicated in the comment.

A.1-110 See revised Table C.8-1 in the Final EIR/S for changes in distances as indicated in the comment. The comment on occupancy of the trailer is noted.

A.1-111 See revised Table C.8-1, Sensitive Land Uses.

A.1-112 The suggested correction has been made in the Final EIR/S.

A.1-113 There were many environmental documents reviewed prior to, and during the course of, preparing this EIR/S by both the EIR consultants and agency staff; the list is too exhaustive to include in the references section.

A.1-114 Significance criteria do not necessarily have to be listed in CEQA in order to be used in environmental impact analysis. Significance criteria can be obtained from a variety of sources, including:

CEQA, established significance criteria of governmental agencies, significance criteria established by the public during scoping meetings, formal and informal policies of governmental agencies, known impact thresholds and those identified in governmental regulations, and experience of impact analysts. The land use significance criteria used for this EIR/S are based on substantial effects on the environment as determined by the professional judgement of the EIR consultants and agency staff. The comment regarding professional standards provides no basis for its assertions.

A.1-115 Mitigation Measure L-3 was developed specifically to address impacts to users of recreation areas. Mitigation Measures T-1 and T-2 are general measures that address impacts to traffic flow and safety of the traveling public.

A.1-116 The referenced text has been revised in the FInal EIR/S.

As the route for the Proposed Project has not yet been selected and could vary from the proposed and alternative routes, the Project Applicant cannot be certain whether fence sections would need to be removed to access construction areas. If removing sections of fencing will not be necessary to construct the Proposed Project across grazing allotments, then the Applicant would not be required to implement Mitigation Measure L-6.

A.1-117 As noted in the EIR/S (Section C.8.2.2.1), impacts on grazing are significant due to conflicts (i.e., disturbances) with the established use of land for grazing. One of the agricultural significance criteria is "conflict with the established agricultural use of an area". References to the impairment of the productivity of grazing land as the basis for impact significance has been deleted from the Final EIR/S.

The discussion of grazing impacts is appropriate for this project and is based on professional experience as well as consultation with agency experts. BLM staff have reviewed this mitigation measure and have not indicated in their review comments that the measure is unwarranted. Mitigation Measure L-5 has been revised accordingly.

Mitigation Measure L-7 has been revised in the Final EIR/S (now numbered L-8b) and Mitigation Measure L-8a has been added regarding a reimbursement stipulation in the Applicant's easement agreements with the farmers.

A.1-118 See response to comment A.1-116.

A.1-119 The referenced mitigation measure (L-5 in the Final EIR/S) was developed to reduce the significant loss of use of grazing land by grazing animals discussed in the first paragraph under "Construction Impacts on Grazing" in Section C.8.2.2.1.

A.1-120 See response to comment A.1-116.

A.1-121 Please see revisions to Table C.3-10 in the Final EIR/S. The representative wildlife species and habitats shown in the table were chosen based on field observation and on the California Department of Fish and Game sponsored *California Statewide Wildlife Habitat Relationships System Volume I* [amphibians], *Volume II* [birds], and *Volume III* [mammals] (Zeiner, Laudenslayer, Mayer and White, 1988).

A.1-122 See response to comment A.1-117.

A.1-123 The significant degradation of the quality of the recreational experience of users of recreation areas described in Section C.8.2.2.2 of the Final EIR/S would not result solely from the degree of visual contrast of the Proposed Project. More importantly, it would result from the fact that the mere presence of modern utility structures would have psychological effects on recreational users that would significantly affect their enjoyment of the natural, scenic, and historic resources of these areas. It is noted that the visual resources analysis is based on adapted BLM Visual Resource Management assessment criteria; the land use analysis considers other factors that contribute to an aggregate impact on land uses.

A.1-124 See response to comment A.1-123. The significance of degradation of the quality of the experience of recreational users in the area of the Infernal Caverns Battleground Memorial Monument identified in Section C.8.2.2.2 would not result solely from the degree of visual contrast of the Proposed Project. It would also result from the fact that the Infernal Caverns Battleground Memorial Monument is a significant cultural resource, and the presence of any modern structures of this type would significantly change the historical setting and experience of visitors to this area. Furthermore, the Infernal Caverns Battleground encompasses more than the battleground site, and includes the larger area of the soldiers' graves and Indian rock rings and hunting blinds; and Key Observation Point (KOP) 6 is only one location in the area of the Infernal Caverns Battleground from which the Proposed Project would be visible.

A.1-125 See response to comment A.1-5.

A.1-126 See Sections C.8.2.2.1 and C.8.2.2.2, under "Recreational Uses," of the Final EIR/S for the revised analysis of project construction impacts and operations impacts, respectively, on the Fort Sage OHV Area.

A.1-127 The text has been changed in the Final EIR/S as suggested.

A.1-128 With regard to the question of how the Proposed Project would limit the ability of CDFG to carry-out its mission for managing the public trust values of WCAs, CDFG explains that the Proposed Project would degrade the Department's ability to carry out specific activities that are normal and expected in a WCA. CDFG gives the following activities as examples: aerial patrol by warden pilots, aerial wildlife counts, placement of wildlife management structures, and placement of facilities for public use and enjoyment of the land and its wildlife (e.g., interpretive displays, wildlife viewing platforms, and parking lots). CDFG further explains that the visual degradation of the land as a result of the presence

of the transmission line facilities would conflict with the intended public use of viewing wildlife in a natural setting.

See response to comment A.1-16 regarding the need for mitigation for impacts to the Doyle WCA considering the future land exchange with BLM.

To address the comment regarding justification for the one-half mile wide corridor impact, CDFG provides the following explanation: 1) this figure represents a substantial visual impact zone of one-quarter mile in both directions from a transmission facility; 2) this zone of impact was developed by Mr. Steven Siegel of Sierra Pacific Power Company during a field trip with Mr. Jim Nelson and Mr. Bob Williams of CDFG near the City of Tracy power plant; 3) during the field trip, the group concurred that the impact of the Proposed Project would be greater than one-half mile wide, and that the one-half mile wide corridor impact would be a conservative figure for calculating the impacts to public trust lands due to placement of the Proposed Project facilities.

A.1-129 See response to comment A.1-16.

A.1-130 Yes, the text regarding impacts on grazing was misplaced. See response to comment PA.7-16.

A.1-131 The text has been revised as indicated in the Final EIR/S.

A.1-132 The referenced text has been revised in the Final EIR/S.

A.1-133 Text has been corrected in the Final EIR/S.

A.1-134 Text has been corrected in the Final EIR/S.

A.1-135 Enforceable rules, regulations, and ordinances are not project mitigation measures, since impact analysis must always take them into account. A maximal and uniform period (7 a.m. to 7 p.m.) for allowed construction was proposed to place a meaningful upper limit on the magnitude of impact across various jurisdictions having differing local standards. This also results in a consistent analysis of the significance of residual impact after application of mitigation measures. The subject period is encoded in state and federal regulations through the CNEL metric (Community Noise Equivalent Level) which recognizes that noise impact significantly increases when noise is produced before 7 a.m. or after 7 p.m. Mitigation Measure N-1, therefore, has a force comparable to that of local noise ordinances.

A.1-136 Mitigation Measure N-3 provides clarification as to the treatment of project generated noise. The text has been changed in the Final EIR/S to advise that Mitigation Measures L-1 and N-3 can be combined when developing the Mitigation Monitoring Program.

A.1-137 through A.1-161 The text changes cited in these comments have been incorporated into the Final EIR/S, with one exception. The Southern California Edison study was not included since it was

not able to be obtained and reviewed for this publication. However, numerous other studies have been presented which demonstrate the broad range of results.

A.1-162 The sources for the daily traffic volume data on Table C.12-1 were staff at each of the affected public agencies; i.e., County Public Works Departments, City Public Works Departments, Reno Regional Transportation Commission, and Caltrans. Contact persons are listed in Appendix A of the EIR/S.

A.1-163 Although the last two bullet items defining significant impact criteria both relate to aviation impacts, they are described separately to provide clarity to the reader, because the first definition relates to general height restrictions, while the second relates to restrictions near airports/heliports. A single, brief definition would be adequate for a knowledgeable reader who is astute relative to FAA regulations, but it is the author's opinion that the additional detail is needed to properly inform the reader of the FAA criteria.

A.1-164 The reference to pedestrian/bicycle routes includes shoulders, hiking trails, forest access routes, etc., not just paved facilities with signs and markings. The project would, therefore, affect some pedestrian routes and mitigation would be applicable, if required by the affected jurisdiction.

A.1-165 Pickup trucks would be acceptable vehicles for transporting the work crews from the staging areas to the work site and are included within the term "crew trucks."

A.1-166 Although it is unlikely that the construction activities would displace any existing parking areas, it is possible that unforeseen circumstances may require the temporary use of a parking lot or a shoulder area that is used for parking by adjacent properties. If these circumstances develop, it is necessary that the parking impacts be mitigated. If these circumstances do not develop, then the mitigation measure would not be implemented.

A.1-167 The suggested consolidation of the three aviation-related mitigation measures would likely result in the same results/mitigation measures. The additional detail shown in the EIR/S is shown to provide clarity and guidance to the Lead Agencies in interpreting the impacts. Ultimately, the FAA is responsible for the implementation of any necessary mitigation measures, regardless of how the impacts and mitigation are presented in the Draft EIR/S.

A.1-168 Comment noted. See also second paragraph of response to comment PA.7-17 and third paragraph of response to comment PA.16-11.

A.1-169 The text change has been made in the Final EIR/S as suggested.

A.1-170 The referenced text has been changed in the Final EIR/S.

A.1-171 The referenced text has been changed in the Final EIR/S.

A.1-172 The referenced text has been changed in the Final EIR/S.

A.1-173 Comment noted.

A.1-174 The cumulative impact would result from the construction of two new transmission line projects within the same field of view--the Alturas Project and the LMUD Intertie. A cumulative impact could also occur even if both new transmission lines are not within the same field of view, if viewers perceive that the general visual quality experienced along Wendel Road is diminished by the proliferation of visible structures (or construction effects such as ground scars).

A.1-175 The photosimulation presented as Figure C.13-3B assumes the maximum structure height of 130 feet and approximately 1,200 foot spans between structures. At the time the photosimulation was prepared, precise structure locations were not known and so representative structure locations are depicted in the photosimulation. While structure location will affect the degree of skylining that will be perceived from a given viewing point, skylining will still occur. With regard to scale of the structures, it should be noted that there is no intervening terrain between the depicted structures and KOP No. 3 on Hwy 299. At distances ranging from approximately 2,300 feet to 4,500 feet from KOP No. 4, the structures, as depicted in Figure C.13-3B present a reasonable approximation of the Proposed Project.

A.1-176 KOP 4 was established in order to assess a "characteristic" visual impact while viewing east on Hwy 299. Even if the route crosses further east than the location depicted in Figure C.13-4B, the structures will appear smaller, the same size as, or larger than, the structure depicted in Figure C.13-4B depending on how close the motorist has approached the highway crossing. The primary factor affecting visibility will be the extent of screening provided by roadside juniper. In this context the photosimulation provides a reasonable representation of a characteristic visual impact that would be experienced by eastbound motorists on Hwy 299.

A.1-177 At the time that the photosimulation depicted in Figure C.13-9B was prepared, project route maps depicted the Proposed Route as close as 110 to 120 feet off of Hwy 395. Applicant personnel further indicated that the route was being pushed closer to Hwy 395 due to a realignment of the Tuscarora Pipeline Project. Following this direction, the transmission line, as depicted in Figure C.13-9B, was placed in close proximity to Hwy 395. In its current location, the base of the first structure is located below the grade of Hwy 395 in a shallow draw immediately adjacent and to the northeast of the highway. If the centerline is now to be located further off from Hwy 395, then the first structure in Figure C.13-9B would appear smaller as indicated by the commenter. However, the level of significance of the resulting visual impact would not change.

A.1-178 The following methodology was used to prepare the photosimulations presented in the EIR/S. The Proposed and Alternative Routes were flown by helicopter. Field surveys were then conducted to photograph existing views from each Key Observation Point. Notes on the terrain, route characteristics, perspective, distance, and angle of view were recorded. Polaroid photos were also taken and locational notes were recorded on the polaroids. Helium balloons were tethered to structure heights at representative structure locations and photographed. Existing structures of similar design and size were

photographed at distances, angles, and perspectives similar to those of the planned photosimulations to aid in structure scaling and development of structure perspective. Scale and perspective mock-ups were prepared and cross-checked against overflight videos, topographic maps and photographs. Photographs were scanned into a an Apple Power PC using a UMAX UC1260 flatbed scanner. Then final simulations were constructed using Adobe Photoshop 3.0.

A.1-179 Based on the independent review of the EIR/S Team utility engineer and as presented in Table A-8, the subject alternative could technically improve reliability for customers west of Tracy. However, the feasibility of the alternative is subject to existing land use constraints.

A.1-180 See response to comment A.1-179.

A.2 Sierra Pacific Power Company (Amended Letter) 1

A.2-1 Comment noted. See responses to comments A.1-75, A.1-76, A.1-77, and A.1-78.

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