

Mr David Young
NEPA Document Manager
Western Area Power Administration
Sierra Nevada Region
114 Parkshore Drive
Folsom, CA 95630

Dear Mr Young:

These comments are addressed to both you as the NEPA contact person and to the contact person, if any, for CEQA; as no contact person have been specified for delivery of comments to the State. There some CEQA issues that are covered here please pass them along to the CEQA coordinator. I apologize in advance for having to send these comments by way of you, but no alternative exists. The extension of response time has been appreciated and put to good use.

It was stated at the Redding meeting that the No Action Alternative was not to be considered in the proceedings for this process. As I am sure you are aware, such statements meet neither the wording nor the intent of the underlying body of Law. Be assured that in the draft and final documents, more than cursory consideration of the No Action Alternative will be expected. In fact, there is considerable evidence to consider that the No Action Alternative should become the preferred alternative. For instance, the intent is to use police powers (condemnation) to build a power line from nowhere to a few larger communities in the central valley and coastal areas. The purpose is to deliver "green power" from nowhere to these few cities. The problem is that there is no "green power" plant out there, and the probability that "green power" plants will actually arise out there is minimal. The potential is not even as great as it is in other parts of the State (solar power is better nearer to the equator, wind power is most effective where there are sustained winds as near the coast, geothermal in this area is too cool for mass energy production processes). The only way this might pencil out is to form a connection to some other form of power probably from some other States, however, again at the Redding meeting the assurances were given that this is not the case; the line is to be used for California generated "green power" exclusively. Please show the evidence that shows the need for this project (contracts, commitments, timelines for specific proposals, etc.) preferably within say 10% of the useful life of the transmission lines being proposed.

Like many others in the area affected by this proposed project, notice to the directly affected persons was not done in a timely manner as required under CEQA. Notice is to be received within 10 days of the filing of notice with the State. I have received a notice by certified mail, but long after the 10 day period had elapsed, in fact it was just a few days after the original comments period was to have closed. It is understood that once the 10 days has gone by, this becomes a non-redeemable situation. The only remedy is to file another notice and make the notification within the 10 days as required by State Law.

Please find enclosed additional comments concerning this proposed project. Unlike this letter, comments are restricted to a single issue and have been kept to a single page in length.

Since the google maps show the proposed line is adjacent to my house, I wish to be kept informed of all aspects of this proposed project by hardcopy mail. My personal contact information follows:

William H. Saffell
Post Office Box 902
Oak Run, CA. 96069
Telephone: (530) 472-3167
e-mail: mtn4str@mountainforestry.com
Shasta County APN: Book 98 Page 42 Parcel 20

Thanking you in advance for your consideration,

Sincerely,

William H. Saffell
Property owner

Enclosures:

**Public Scoping Comments addressing the
Joint Environmental Impact Report /Environmental Impact Statement For the
Transmission Agency of Northern California Transmission Project**

The included comments are addressed equally to both the Western Area Power Administration (WAPA), an Agency of the U.S. Department of Energy (lead Federal agency) who is responsible for compliance with the National Environmental Policy Act (NEPA), and the Transmission Agency of Northern California (TANC) a joint exercise of powers agency under the authority of the State of California government code (lead State agency) who is responsible for compliance with the California Environmental Quality Act (CEQA). All comments are sent as directed to WAPA since TANC has neglected to provide a contact point for comments specifically addressing the CEQA concerns. Workshops and breakout groups would have been helpful to the public in the scoping process, and should be considered in the future as this program is developed.

These comments concern the selection of alternatives considered. In addition to the "No Action Alternative" not addressed at all in the scoping meetings, and required by law to be studied & addressed, there appears to be at least two additional alternative routes that meet the criteria of reasonable and therefore need to be studied and addressed in the environmental process /documentation.

1. There is the route down the east side of the Sierras to the I-80 transmission corridor and then across to the Sacramento Valley. This choice is obvious since the transmission corridors are already established and environmental work already done for the most part; however, it was not mentioned or discussed in the scoping meeting, even when it was suggested in the comments from the floor.
2. This route would only involve the location the western portion of the North Segment to near the end of the North Segment. This proposed route would truncate the proposed lines just west of Burney, CA and proceed directly south and west to Anderson, CA. The route appears shorter than the current proposal, leaving the proposed system in the existing industrial area west of Burney and proceeding south and west, staying in the Timber Production District areas already zoned to include transmission line corridors for as long as possible, and then turning west in the vicinity of Dersch and Ash Creek roads to tie back into the proposed system just prior to reaching the community of Anderson. The route appears to be feasible since there is an existing underground gas pipeline and a major road system (Tamarack Road) that traverse the same general area. The restricting requirements for transmission lines are certainly less restrictive than that of a buried gas line or a major road. In this alternative location the proposed substation would tie to the Pacific Gas and Electric Company (PG&E) system (a stated criteria) near the community of Burney on the main feed line to the critical PG&E Round Mountain substation that currently serves three co-generation plants adding power to their system and the proposed wind farm system on Hatchet Ridge when and if it should come on line.

These alternate routes should be studied & publicly scoped prior to inclusion for consideration in the draft environmental documents because they appear to meet the stated goals & objectives with less environmental & social impacts, and at a significantly lower cost.

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These comments concern the scope of the project and concerns that the environmental conditions are so varied that it is impossible to cover all of the existing and potential possibilities in a single Environmental document.

The Joint Environmental Impact Report /Environmental Impact Statement should be prepared as a programmatic document calling for more specific publicly scoped environmental assessments to be filed for each project segment addressing in more specific terms and much greater detail the environmental and social issues, concerns and mitigation measures within each portion of the total project.

This project, as proposed, runs from the Upper Sonoran high desert areas in Lassen County, over eastside, high elevation, west side and multiple other ecotypes crossing the Sierra Cascade mountain complex, through the Sierra foothill areas and into the Central Valley areas, and that is just the North Segment. To consider & address the various effects and generated within even the broadest element categories of Solar Radiation & Thermal Influences, Air Quality & Quantity, Climate & Weather, Water Quality & Quantity, Surface & Subsurface Runoff, Geology & Soil, Plants & Animals and Human & Social (all of which need to be addressed) becomes unwieldy. A program level environmental document can address these issues in more general terms, leaving the detailed analysis on each individual area to be covered by additional planning documents and in the detail required for full & meaningful discovery, disclosure, public involvement and realistic resource mitigation planning as required under NEPA & CEQA regulations.

In order to meet the intent of NEPA & CEQA, the project area needs to be broken down in to much smaller units where the intricacies of individual soil types and the effects of for instance the removal of vegetation on this particular slope, aspect, soils class, vegetation complex; or the affect of the placement of individual tower footings on specific soil types & potential effects on slope stability can be carefully studied and meaningfully. Such individual environmental documentation will be publicly scoped and addressed on a case-by-case basis.

This procedure is with precedent & has been used many times in the past to cover broad programs and regional sized project proposals similar to this one. One way to accomplish this is to break it down the project down ownerships, treating each ownership as an ecological unit, although landowners with larger holdings may wish to break their land down to watersheds or some similar division that fits the management plan for the landowner. This would assure that the TANC project is in compliance with the intent and extent of the NEPA and CEQA requirements.

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The comments concern the cumulative effects of impacts. This section is to disclose all future plans of TANC and any other planned actions proposed by others. The size of the corridor study areas and the size of the proposed substation at Round Mountain, CA both suggest that TANC has additional planned projects, not yet disclosed. Pacific Gas & Electric Company (PG&E) has disclosed plans for additional transmission lines that may include the Round Mountain substation. All of the known and proposed projects must be disclosed and the cumulative effects of all of them, if brought to fruition need to be discussed in the environmental documentation.

As currently proposed, the TANC project is totally dependent upon the development of here-to-fore unspecified "environmental power sources" that will be required to make the project functional, without which, the project is a power line with no power source. Since these facilities are projected to be an integral part of, and stated to be critical to the TANC project, the specifics of these sources need to be disclosed. For each proposed or actual facility, a specific set of questions should be addressed as follows:

Who specifically is committing the resources and financing to build these "green" facilities upon which the viability of the project depends?

What specifically are the types of facilities to be & what, both individually & cumulatively, is their capacity to be? What will the TANC system be used for prior to the delivery of "renewable energy" to the system?

When will construction begin & when are these facilities to be completed; when is the on line date for these facilities to begin delivering power to the TANC system? When will the TANC system reach design capacity?

Where specifically are these facilities to be built?

Why are they to be built in these locations as opposed to other locations?

How firm are the TANC specific commitments? How much of the useful life of the TANC system will be gone before any "renewable energy" sources will begin using the system?

Since these facilities are an integral part of the TANC project proposal and since the TANC proposal is dependant upon the completion of these facilities, the cumulative effects of the development & operation of all of these facilities must be disclosed, publicly scoped, studied & discussed in detail within the environmental documentation.

Other land conversion projects that can reasonably be anticipated are to be included; such as PG&E energy, highway upgrades, utility projects (telephone & gas lines), subdivisions, housing, etc. The cumulative effect of all these are to be considered in the environmental documentation.

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The comments concern the economic & social impacts on one property owner with one tract of land. The tract consists of 48 acres of predominately timber ground. The owner lives on the tract in question. It was purchased in 2000 upon arrival in the Redding area to work. The tract was purchased with specific goals in mind; these being to live on the property and develop a non-industrial forestry operation, and when the time comes, to sell the property to secure the retirement years, which are just around the corner.

Those goals have been in the process of implementation over the last 9 years. To the first item, the brush has been removed from around the house to a distance of 150 feet in all directions. The house has been remodeled. The house water is obtained from a spring. This is a requirement since the occupant has intolerance to chlorine in water. The spring is in the process of being refurbished and the holding tank cleaned. The timber stands are in the process of being improved. The stands are just beginning to respond to the treatments applied. Even with the recent market downturn, the value of our property has more than doubled due to the continuing efforts of the landowners; which speaks to the second goal accomplishments.

Execution of the TANC Transmission Project upon our property would destroy both of the goals that are outlined above and have been so carefully executed. Power lines crossing the property would detract from the resale value so heavily as to destroy our original investment. As to the timber management goal, the removal of 10% to 20% of the ground from production to accommodate the power line corridors would make an already marginal economically manageable stand too small to yield the returns expected and would effectively destroy the entire forest management program as far as for return on investment purposes.

Special note: The purchase documents show that there is a prehistoric Indian village on the property somewhere. There are also historic coalmines on the premises. These have not been found as of this time, but would need to be located, and protected from damage or molestation if the project were to proceed across the tract.

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