



Transmission Agency of Northern California
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October 30, 2015

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BDCP/WaterFix Comments
P.O. Box 1919
Sacramento, CA 95812

Also Transmitted via Email to: BDCPComments@icfi.com

**Subject: Transmission Agency of Northern California and California-Oregon
Transmission Project Comments on the Bay Delta Conservation Plan/California Water
Fix Partially Recirculated Draft Environmental Impact Report/Supplemental
Environmental Impact Statement**

BDCP/WaterFix:

This letter documents the comments that the Transmission Agency of Northern California (TANC) and the California-Oregon Transmission Project (COTP) are submitting in response to the Bay Delta Conservation Plan/California Water Fix Partially Recirculated Draft Environmental Impact Report/Supplemental Environmental Impact Statement, herein referred to as the "Current Draft." This letter includes five 2015 comments over five pages that include reiteration of comments submitted in 2014 to assist your document assembly efforts and the development of adequate responses.

2015 TANC-COTP Comment 1 – Responses to Draft EIR/EIS Comments: TANC initially submitted 24 comments on July 28, 2014 titled: "California Environmental Quality Act Comments from the Transmission Agency of Northern California and California-Oregon Transmission Project Regarding the Proposed Bay-Delta Conservation Plan and Environmental Impact Report/Environmental Impact Statement." Those comments are reiterated herein (as submitted in 2014) as Attachment 1. Please consider those comments applicable as relevant to the changing nature of the configuration of each of the alternatives being considered in the Current Draft.

We look forward to a separate, distinct, and clearly understandable response to each of those 24 comments submitted in 2014, consistent with your commitment on pages 1-30 of the Current Draft regarding individual comments, wherein you have stated that:

“The Final EIR/EIS will include written responses to comments on both the RDEIR/SDEIS and the original Draft EIR/EIS. If comments on the original Draft EIR/EIS no longer apply based on the RDEIR/SDEIS analyses or project changes, the response will indicate that the comment has been addressed by the RDEIR/SDEIS or that the comment was not addressed because of the changes presented in the RDEIR/SDEIS.”[*Underlining added*]

2015 TANC-COTP Comment 2 – Proposed Power Transmission Relocation of the COTP Towers Affected by the Clifton Court Forebay/Byron Tracy Forebay Expansion: TANC-COTP Comment 7 on the Draft EIR/EIS in 2014 addressed the general issue of expansion of the Clifton Court Forebay/Byron Tract Forebay that would cross, and therefore flood the COTP right of way (ROW).

The Draft EIR/EIS did not identify a specific corridor for relocating a portion of the COTP ROW. The Current Draft has introduced new information, better specifying the proposed relocation of six or more COTP transmission towers to a location southeast of an expanded Clifton Court Forebay. This new information includes additional text and figures regarding the new “Power Transmission Relocation” identified as follows (added text in red):

- Appendix A: Page 13-11: The power transmission relocation area south of Clifton Court Forebay would also affect approximately 13 structures.
- Appendix A: Page 24-24: In addition to construction of a “split” transmission line system, an existing 230 kV and 500 kV transmission line, which run parallel south of Clifton Court Forebay, would be relocated to an area further south/southeast within 0.5 mile of their original location.
- Appendix A: Page 25-72: In addition, an existing 500 kV transmission line south/southeast of the Clifton Court Forebay will be relocated to an area less than half a mile southeast of the current location of the existing towers.
- Mapbook Figures: M3-4: Sheet 12 of 15; M12-4: Sheet 6 of 8; M13-4: Sheet 6 of 8; M14-8: Sheet 6 of 8; M15-4: Sheet 6 of 8.

This is not an all-inclusive list, but is indicative of new information substantiating a new CEQA comment. We understand the uncertainties associated with identifying specific locations for project features and the associated utility relocations. The editorial revisions listed above as appearing in the Land Use, Hazards and Hazardous Materials, Public Health, and probably as yet undiscovered chapters and/or sections in the extensive Current Draft or an Appendix thereto, demonstrate that the authors of the Current Draft may consider the relocation of 500kV transmission towers as an “afterthought,” or otherwise incidental activity that simply requires appropriate coordination similar to the

routine relocation of other utility facilities and lines. We can understand that such relocations are rarely analyzed in conventional environmental documents for much smaller programs and projects and hope that the following comments can help inform the Current Draft authors and the BDCP agencies regarding the magnitude of major power line relocations. The relocation of any portion of a 500 kV transmission line is a major undertaking. It includes the time and cost needed for, but not necessarily limited to the following activities:

- Acquiring the easements and land rights needed for a new ROW and access roads for the transmission towers;
- Obtaining all environmental permits and approvals needed for establishing a new ROW and access roads. This permitting and approvals plan would depend on the biological, cultural, natural, and other physical and environmental resources that could be affected by the new transmission ROW. This includes all NEPA and CEQA compliance, associated agency consultations, and related surveys, studies, and investigations needed to ensure that the new ROW can be legally perfected.
- Conducting all design, engineering, and operational planning and interagency coordination needed prior to removing the existing line from service. These activities would be needed to support the development of a definite plan of action for cost-effectively relocating the line with minimum disruption to grid reliability.
- Coordinating a transmission line outage. At any time, the COTP can be transmitting 1,600 or more megawatts of electric energy within the California electric grid. Removing this level of transmission from the grid for any period of time requires an "outage" of the line. Outages require extensive coordination with other transmission operators, often a year in advance to ensure that the grid can operate reliably during the planned outage. Outages therefore result in expensive coordination, operational, and related administrative costs. Outages also result in lost revenue resulting from foregone sales of power to TANC-COTP customers for the duration of the outage. Outages of the 500kV COTP would be needed for relocating transmission towers. The length of these outages would depend on the required construction of new towers and all associated interconnection and energization activities.
- Responding to all legal challenges, legislation, and litigation associated with relocation from whatever source and regarding any and all issues.

In summary, if relocation is truly needed when its costs and benefits are compared to the cost/benefit analysis of the hydrologic modifications that would preclude the need for expanding Clifton Court Forebay/Byron Tract Forebay, the BDCP agencies would be responsible for all costs associated with relocation, as defined by TANC and the Western

Area Power Administration. But for the BDCP/Water Fix project, such relocation costs would not need to be incurred.

2015 TANC-COTP Comment 3 – Coordinated Planning with TANC-COTP and

Western: The easements comprising the portions of the potentially affected COTP ROW of concern are held by the United States and administered by the Western Area Power Administration (Western), a federal agency under the Department of Energy. Western also acts as the TANC Operations and Maintenance agent, for the benefit of all of the COTP participants (which include TANC, Western, the Pacific Gas and Electric Company (PG&E), the City of Redding, the Carmichael Water District and the San Juan Water District). Those easements include provisions to protect against any additional uses affecting the COTP ROW that could interfere with the safe operation and maintenance of the COTP facilities. The COTP transmission towers and conductors are owned by TANC.

It is our understanding that the proposed relocation of the COTP transmission towers would be accompanied by the simultaneous relocation of six or more adjacent Western transmission towers that would otherwise be flooded by the Clifton Court Forebay/Byron Tract Forebay expansion. Western owns the easements, towers, and conductors associated with the adjacent “Tracy-Hurley” 230kV transmission lines.

Because of the relationship between TANC-COTP and Western, it is imperative that the BDCP agencies coordinate all transmission relocation proposals associated with these lines simultaneously among TANC, the COTP, and Western. Please coordinate all proposed tower relocations and other planned activities affecting the COTP ROW and the Western Tracy-Hurley towers/ROW simultaneously with Western and TANC from the initiation through the conclusion of all such proposals and discussions. Many of the legal, operational, maintenance, and related reliability considerations associated with the TANC-COTP-Western responsibilities are intricately intermingled, and could not be effectively addressed in isolation from one another.

2015 TANC-COTP Comment 4 – Unacceptable Corridor Proposed for Relocation of the TANC-COTP Transmission Towers: The proposed “Power Transmission Relocation” corridor as identified on the Current Draft Mapbook Figures referenced in 2015 TANC-COTP Comment 2, above, would be unacceptable to TANC as currently proposed for the following reasons:

- It is not unreasonable to assume that future state, federal, and south-of-delta water agency efforts targeting greater quantities of water diversions through the BDCP/Water Fix facilities would require additional future expansions of the Clifton Court and Byron Tract Forebays. Such reasonably foreseeable future

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expansions beyond the implementation of the BDCP/Water Fix as currently proposed could have the potential to call yet again for another expensive relocation of the affected TANC transmission towers, if not additional segments of the existing ROW. A ROW located sufficiently far enough away from a potentially expanding Forebay complex would probably be a more prudent long-term solution, if needed;

- Existing ground conditions, including high water tables and potentially unstable substratum in the area proposed for COTP tower relocations would be exacerbated by adjacent flooding of the expanded forebays and subsequent lateral seepage. Tower stability and integrity are of utmost importance from public health, safety and grid reliability perspectives.

2015 TANC-COTP Comment 5 – Request for Comprehensive, Complete, and Timely Communications to TANC Regarding the Bay-Delta Conservation Plan Programs and California Water Fix Partially Recirculated Draft EIR/Supplemental Draft EIS: TANC and the COTP are essential to maintaining the reliability of the California electric grid and maintain substantial ongoing investments in transmission towers, conductors, substations, communication sites, real property assets, and related operations and maintenance equipment that may be affected by the BDCP /California Water Fix Programs. We fully understand that the BDCP/California Water Fix program is subject to significant changes in configuration, timing, the nature of proposed alternatives, and the physical and natural resources impacts as ultimately may be expressed across the landscape. In light of these inevitable changes, and the high likelihood that such changes could affect other TANC and COTP properties and assets in new and different locations and ways, please consider this comment as our request that the following email addresses be added to all mailing lists for the BDCP /California Water Fix Programs:

info@tanc.us;

dwagenet@tanc.us

If you have any questions regarding these comments, or Attachment 1, please call Don Wagenet at (916) 852-1673, or email him at his email address above.

Thank You,



Bryan Griess

TANC General Manager

ATTACHMENT 1

**FROM THE TRANSMISSION AGENCY OF NORTHERN CALIFORNIA AND CALIFORNIA-OREGON
TRANSMISSION PROJECT REGARDING THE PROPOSED BAY-DELTA CONSERVATION PLAN AND
ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT**

INTRODUCTION

The Transmission Agency of Northern California (TANC) presents the following comments in the interest of assuring that the construction, operation, and maintenance of the alternative selected for implementation of the Bay-Delta Conservation Plan (BDCP) will minimize or entirely avoid potential hazards that could adversely affect the operation and maintenance of the California-Oregon Transmission Project (COTP).

TANC, the COTP, and Easement Provisions Protecting Against Uses That May Interfere with the Safe Operation and Maintenance of the COTP Facilities.

TANC is a joint exercise of powers agency organized under Chapter 5, Division 7, Title 1 of the California Government Code, and a Joint Powers Agreement, dated as of December 10, 1984, among the Cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara and Ukiah, the Modesto Irrigation District (MID), the Sacramento Municipal Utility District (SMUD), and the Turlock Irrigation District (TID), as members, and Plumas-Sierra Rural Electric Cooperative, as an associate member.

TANC is the Project Manager of the COTP, which is an existing 339-mile long, 1,600-megawatt, 500 kilovolt (kV) transmission project between the California-Oregon border and Central California (Figure 1). The COTP is critical to the delivery of electricity to California. The Western Area Power Administration (Western) has minority ownership interest in the COTP, transmission entitlement rights, certain lands rights, and provides O&M services to TANC for the COTP.

The following comments clarify certain references to TANC and the COTP.

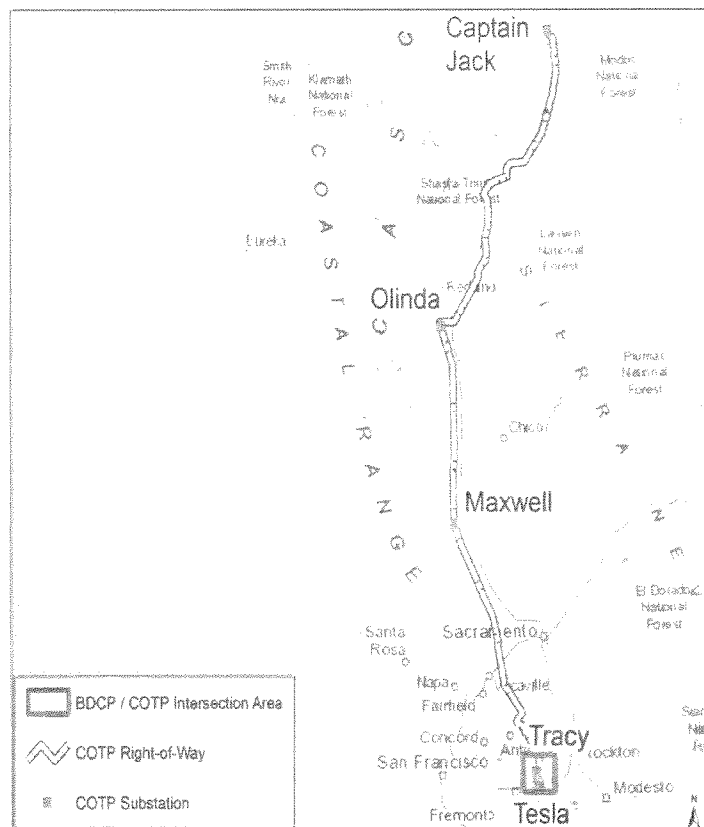


Figure 1. COTP ROW and BDCP Area of Concern

CALIFORNIA ENVIRONMENTAL QUALITY ACT COMMENTS
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Comment 1. Draft EIR/EIS Page 20-7, lines 16-18. The referenced sentence should be changed to read as follows (with italicized language inserted):

"Electricity within the Plan Area is transmitted by power lines owned variously by the participants in the California-Oregon Transmission Project (COTP) (which include the Transmission Agency of Northern California (TANC), the Western Area Power Administration (Western), Pacific Gas & Electric (PG&E), the City of Redding, the Carmichael Water District and the San Juan Water District), Western Area Power Administration (Western) and the Transmission Agency of Northern California (jointly own the California-Oregon Transmission Project), PG&E, SMUD and MID."

Comment 2. Draft EIR/EIS Page 20-67, lines 23-24. The referenced sentence should be changed to read as follows (with italicized language inserted):

"The alignment of the canal and other conveyance facilities constructed under this alternative would cross power transmission lines owned variously by the participants in the California-Oregon Transmission Project (which include TANC, Western, PG&E, the City of Redding, the Carmichael Water District and the San Juan Water District), PG&E-Pacific Gas & Electric, Western and SMUD."

Comment 3. The easements comprising the portions of COTP right of way (ROW) of concern are held by the United States and administered by the Western Area Power Administration (Western), a federal agency under the Department of Energy, acting as TANC Operations and Maintenance Agent, for the benefit of all of the COTP participants (which include TANC, Western, the Pacific Gas and Electric Company (PG&E), the City of Redding, the Carmichael Water District and the San Juan Water District). Those easements include provisions to protect against any additional uses affecting the COTP ROW that could interfere with the safe operation and maintenance of the COTP facilities.

Please see the BDCP EIR/EIS comments submitted under separate cover by Western. Those comments are hereby incorporated by reference to the extent that Western's interests and abilities to fulfill its contractual and other obligations to TANC on behalf of the COTP and its members and participants are in any way affected by the BDCP.

Comment 4. TANC's comments herein are not intended, and shall not be construed, as authorization of, or acquiescence in, any particular uses of the COTP ROW for the purposes of implementing the BDCP.

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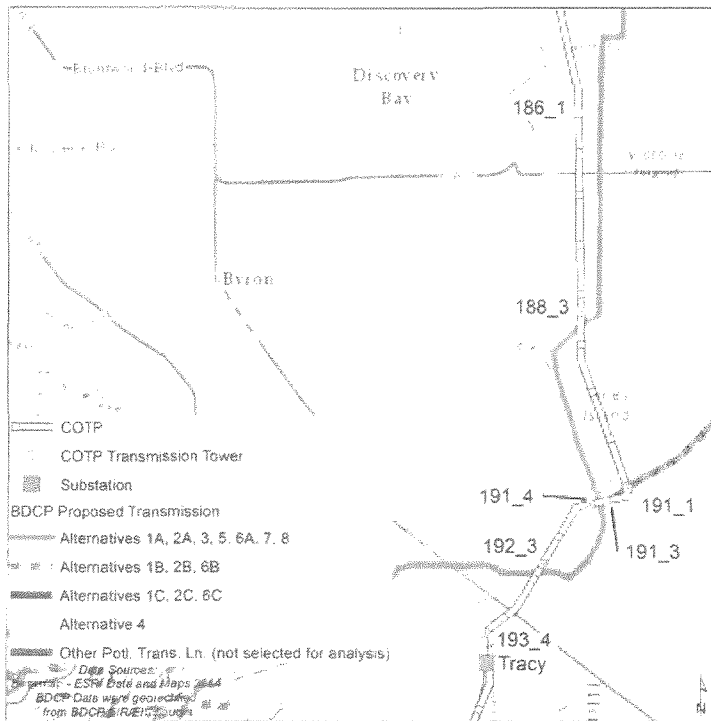


Figure 2. BDCP Alternatives Near the COTP

Potential BDCP Physical Impacts to the COTP

Certain Bay Delta Conservation Plan (BDCP) alternatives have the potential to adversely affect access to the COTP and its O&M. Figure 2 indicates the extent of the area where the BDCP alternatives would affect COTP O&M activities.

Several types of construction activities are planned to be conducted within or adjacent to the COTP ROW, including:

- Expansion of the Clifton Court Forebay/Byron Tract Forebay Across the COTP ROW;
- Permanent and Temporary Transmission Line Crossings of the COTP ROW;
- Permanent Water Conveyance Facility Crossings of the COTP ROW; and
- Potential Excavation and Storage of Residual Tunnel Material (RTM) and Other Spoils in the COTP ROW.

Each of these types of construction activities, and the long-term operation and maintenance of the resulting BDCP facilities are of concern to TANC. The Draft BDCP EIR/EIS does not provide site-specific, detailed information regarding the methods and equipment to be used in the construction of the conveyance and transmission facilities as they cross the COTP ROW.

The following comments address TANC's concerns regarding the need for advance notification and coordination with TANC, and ongoing engineering and safety planning and practices that will need to be implemented as the BDCP proceeds.

Comment 5. The Draft BDCP EIR/EIS does not adequately acknowledge the public health and safety risks associated with construction activity in proximity to high voltage transmission lines. Indeed, Chapter 25 of the Draft BDCP EIR/EIS, which addresses "issues related to human health and safety that could potentially be affected by implementation of the BDCP alternatives,"

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(Draft BDCP EIR/EIS, p. 25-1, lines 3-4) makes no mention of these concerns and, correspondingly, does not identify any mitigation measures to address these concerns.

Comment 6. Crane and pipeline work under the COTP would be inherently hazardous, even with the best safety plan and supervision. The risks here are not just damaging and deadly harm to the equipment, facilities, and people involved in the construction and operation of the Project, but also harm to the population in general and the economy of the Western region. Uninterrupted power supplies are central to public safety, health, medical care, vehicle and air traffic control, information exchange, the storage and provision of safe foodstuffs, fresh water production and sanitary waste disposal; in fact, virtually every facet of modern life depends on grid reliability.

Expansion of the Clifton Court Forebay/Byron Tract Forebay Across the COTP ROW

Comment 7. BDCP Alternatives 1A, 1B, 2A, 2B, 3, 5, 6A, 6B, 7, and 8 propose the development of the Byron Tract Forebay to be located immediately south of and adjacent to the existing Clifton Court Forebay. We understand that approximately 14 million cubic yards of earth would be excavated to create the Byron Tract Forebay, and that the forebay would be used to provide storage of approximately 4,300 acre-feet of water with a surface area of approximately 600 acres.

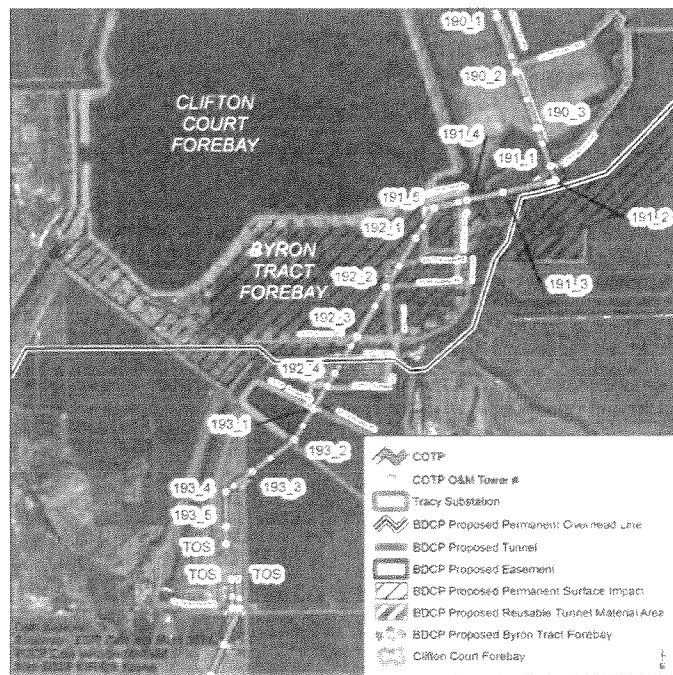


Figure 3. Byron Tract Forebay Expansion Across the COTP ROW

We understand that the Forebay would remain permanently flooded consistent with its purpose. Figure 3 shows the area where the forebay expansions would cross the COTP ROW. Forebay expansion across the COTP ROW would significantly and adversely affect the COTP facilities and ROW. Tower footings were not designed to withstand constant flooding and the reductions in stability that would result from permanent inundation. Specifically, the following adverse physical impacts would occur:

- Excavation within 100 feet of transmission tower footings during construction would threaten the integrity of tower footings and risk the collapse of the towers.
- Forebay flooding would severely reduce the integrity of the transmission tower footings, and likely result in tower failure.

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- The structural stability of five or more 500-kV COTP transmission towers would be threatened by excavation and subsequent flooding of the expanded forebay.
- The cumulative impacts of excavation and flooding would almost certainly result in one or more transmission tower failures over time.

The proposed location of the forebay expansion is therefore unacceptable to TANC. Forebay expansion needs to be relocated away from the COTP ROW. The excavation, flooding, and protective levees need to be located no less than 500 feet west of the existing COTP ROW to ensure continued integrity of the COTP transmission towers.

Comment 8. If the alternative selected for BDCP implementation includes expansion of the Clifton Court/Byron Tract Forebay complex such that it would inundate any part of the COTP ROW, the BDCP proponent agencies will be responsible for all additional and/or replacement right of way that may need to be acquired for relocation of the existing COTP towers. The BDCP proponent agencies would also be responsible for all costs for the design and construction of any new transmission towers that will be needed to maintain COTP service levels as the COTP is relocated to new ROW. The BDCP proponent agencies would be required to procure the new ROW with rights fully equivalent in all respects to the current rights. Full ownership and transmission entitlements associated with those rights will need to be vested completely to TANC and the COTP participants. The BDCP proponent agencies would also be responsible for full funding of all environmental studies, permit applications, and all other regulatory compliance requirements needed for relocating the COTP ROW, and the design, construction and commissioning of the replacement 500-kV line of equal or greater capacity. The BDCP agencies would also be responsible for payment of all lost revenues resulting from outages needed for relocation, replacement interconnection, and for all associated litigation costs.

Permanent and Temporary Transmission Line Crossings of the COTP ROW

Draft BDCP EIR/EIS Figures 3-25, 24-6, 25-2, and others indicate that proposed temporary and permanent transmission lines needed for BDCP power could cross the COTP ROW. The proposed COTP ROW crossings could occur at COTP towers 156/4, 186/1, 188/3, 191/3, 193/1 and 193/4. The following comments apply to any and all permanent and temporary transmission and distribution line crossings of the COTP ROW proposed as part of the BDCP.

Because these crossings pose potential construction, operation, and related safety hazards, the following construction practices will be required to be undertaken as standard precautions in the design and installation of transmission crossings of the COTP ROW.

Comment 9. TANC requests that written notification be provided to itself and Western of all locations where temporary or permanent BDCP transmission lines will be crossing the COTP ROW, to be provided no fewer than 180 days prior to the initiation of construction.

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Comment 10. Access to the COTP facilities for inspection and maintenance, including access for heavy equipment, shall be required at all times during BDCP transmission facilities planning, construction and operation. All COTP ROW access roads must be available at all times for emergency and routine O&M activities.

Comment 11. No transmission line crossings of the COTP ROW will be authorized to be sited in a manner that would place new transmission towers within the COTP ROW.

Comment 12. At all locations where proposed transmission or distribution lines to deliver power to the BDCP cross the COTP ROW, they shall cross under the COTP conductors. Further, these crossings shall satisfy National Electricity Safety Code and/or California General Order 95 requirements (whichever is more restrictive) for the COTP line under its maximum sag conditions.

Comment 13. TANC requires that it be consulted prior to and during the installation of temporary clearance markers to indicate the closest safe distances from the conductors.

Comment 14. Permanent markers indicating the proximity of energized high-voltage power line conductors shall be required to be furnished and installed on BDCP electric transmission facilities before the completion of construction according to standard industry practices for such marker installations.

Permanent Water Conveyance Facility Crossings of the COTP ROW and Potential Excavation and Storage of Residual Tunnel Material (RTM) and Other Spoils in the COTP ROW

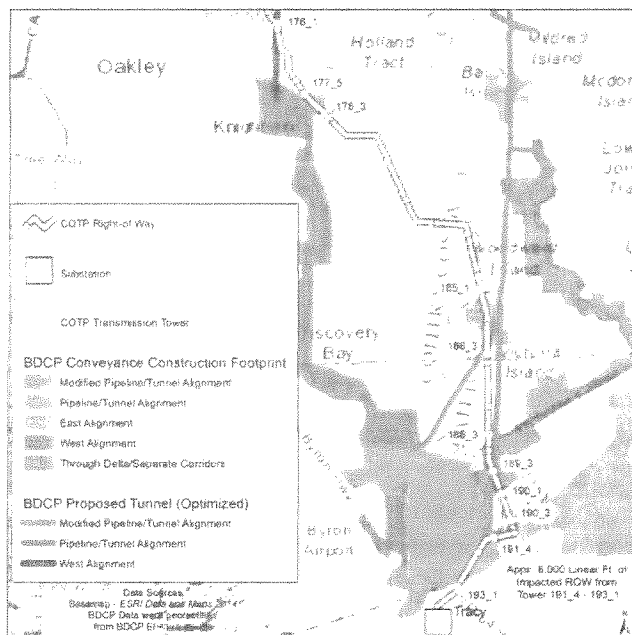


Figure 4. BDCP Proposed Crossings of the COTP ROW

BDCP EIR/EIS Figures 24-6, 25-2, and others indicate that Modified Pipeline/Tunnel Alignment, Pipeline/Tunnel Alignment, Western Alignment, and Through Delta/Separate Corridors conveyance alternatives could cross the COTP ROW. Figure 4 indicates the proposed locations of these crossings near COTP transmission towers.

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BDCP excavation, construction, operation, and maintenance activities have the potential to adversely affect the physical conditions supporting the structural integrity of the COTP, ROW access, and O&M activities. **The following comments therefore apply to any and all construction near or adjacent to the COTP ROW.**

Comment 15. TANC requests an electronic copy of each draft version of any Project safety plan applicable to those construction activities within or adjacent to the COTP ROW be provided to itself and Western no fewer than 180 days prior to the approval of the plan for implementation.

Comment 16. TANC requires advance written notice of at least 180 days prior to any construction activity to take place within the COTP ROW.

Comment 17. TANC will require that the BDCP provide detailed, site-specific information regarding the construction practices that will be occurring within the COTP ROW, and within 500 feet of the COTP ROW that includes, but is not limited to:

- Construction equipment;
- Construction crew sizes;
- The extent to which cranes will be used in installing the conveyance facilities;
- Maintenance of clearance distances to COTP conductors;
- The duration of all construction activities within the COTP ROW;
- Excavation practices within or adjacent to the COTP ROW and transmission towers; and
- Excavated materials transport and placement locations.

Comment 18. TANC requires that a TANC representative be on site at times when construction work is conducted within or adjacent to the COTP ROW for any and all BDCP construction activities.

Comment 19. TANC will require the development of a Compensation Agreement for the time needed for on-site representation of TANC's interests.

Comment 20. TANC requests that all communications to TANC provided as requested in these Comments be transmitted in both electronic and hard copy formats to the following TANC staff:

Email:

info@tanc.us

psanchez@tanc.us

dwagenet@tanc.us

Regular Mail:

Transmission Agency of Northern California

P.O. Box 15129

Sacramento CA 95851-0129

Attention: General Manager

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Comment 21. BDCP should coordinate closely with Western consistent with those comments submitted under separate cover by Western to ensure that the BDCP does not cause any unsafe construction or operating conditions.

Comment 22. All temporary earthwork within or adjacent to the COTP ROW shall be designed and implemented in a manner that results in drainage away from COTP transmission tower footings.

Comment 23. No cut or fill or cofferdam construction and/or dewatering activities will be authorized that could affect the stability of the COTP transmission tower footings consistent with all applicable government codes. Excavations will not be authorized within 100 feet of COTP transmission tower footings.

Comment 24. Residual Tunnel Material and any and all other excavated soil, spoils, or other materials will not be allowed to be placed within the COTP ROW.

TANC appreciates the opportunity to comment on the Draft BDCP EIR/EIS. We look forward to coordinating with the BDCP proponent agencies regarding the responses to these comments and the importance of maintaining the safety, reliability, and integrity of the COTP throughout BDCP planning, design, construction, operation, and maintenance.

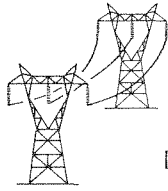
Please call Don Wagenet at 916.852.1673 if you have any questions regarding these comments.

Sincerely,

A handwritten signature in cursive script that reads "Don Wagenet, for".

Bryan W. Griess
General Manager
Transmission Agency of Northern California

Enclosures



TRANSMISSION AGENCY OF NORTHERN CALIFORNIA
P.O. Box 15129, Sacramento, CA 95851-0129 www.tanc.us

DONALD W. WAGENET
Environmental and Land

Phone (916) 852-1673

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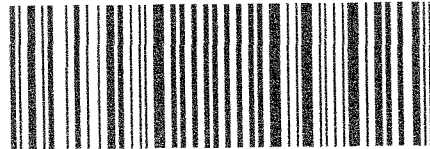
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