



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Northern Region
 601 Locust Street
 Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
 CHARLTON H. BONHAM, Director



June 21, 2023

Boris Sanchez
 Public Utilities Regulatory Analyst III
 California Public Utilities Commission
 505 Van Ness Avenue
 San Francisco, CA 94102
Boris.Sanchez@cpuc.ca.gov

SUBJECT: REVIEW OF ROUND MOUNTAIN 500Kv DYNAMIC REACTIVE SUPPORT PROJECT, STATE CLEARINGHOUSE NUMBER 2023050654, SHASTA COUNTY

Dear Boris Sanchez:

The California Department of Fish and Wildlife (CDFW) has reviewed the Initial Study and Mitigated Negative Declaration (ISMND) dated May 2023 for the above-referenced project (Project). CDFW appreciates this opportunity to comment on the Project, pursuant to the California Environmental Quality Act (CEQA) Guidelines¹.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. Likewise, "take" authorization, as outlined by the applicable Fish and Game code, may be required if the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), or state listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish and G. Code § 1900 et seq.).

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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Project Summary

The Project, as described in the ISMND, is as follows:

“The Project would involve construction of the Fern Road Substation containing two static synchronous compensator (STATCOM) units (devices used to regulate voltages for transmission networks and assist in ensuring reliable operation of transmissions systems in proximity to a substation) and ancillary components adjacent and independently connected to Pacific Gas and Electric Company’s (PG&E) regional electric transmission system via the Round Mountain – Table Mountain #1 and #2 500 kV transmission lines. The Project would support the regional transmission system by providing voltage support and grid stability, which would facilitate the reliable operation of the extra high voltage transmission system proximal to the PG&E Round Mountain and Table Mountain substations. The purpose of the Project is to provide dynamic reactive support at the PG&E Round Mountain Substation, a 500 kV level regional substation. Connection to the PG&E Round Mountain Substation would require PG&E to reconfigure approximately 1,000 feet of both the Round Mountain – Table Mountain #1 and #2 500 kV transmission lines for an overhead connection to the Fern Road Substation.”

Comments and Recommendations

CDFW recognizes that the California Public Utilities Commission (CPUC) has taken some appropriate steps to identify and thoroughly assess potential impacts to biological resources, including an evaluation of potentially occurring species and habitats, an aquatic resource delineation, and the formulation of avoidance and minimization measures to reduce potential impacts to sensitive resources. However, CDFW has the following comments as they pertain to biological resources.

Blue Oak Woodlands

Removal of oak woodlands throughout Shasta County without adequate mitigation continues to result in a cumulative permanent loss of oak woodlands throughout the region. Oak woodlands are important to a wide variety of species and have higher levels of biodiversity than virtually any other terrestrial ecosystem in California². Oak woodlands provide habitat for nearly half of the 632 terrestrial vertebrates species found in the state³.

The ISMND states 727 blue oak trees will be removed (Section 2.5.2.1) and 65

² Bernhardt, Elizabeth A., and Swiecki, Tedmund J., 2001. *Ecological Importance of California Oak Woodlands*. Available here: <https://oaks.cnr.berkeley.edu/wp-content/uploads/2019/03/Ecological-Importance-of-CA-OW.pdf>

³ Drill, Sabrina., Purcell, Kathryn., and Tietje, William. 2005. *Oak Woodlands as Wildlife Habitat*. Available here: https://www.fs.usda.gov/psw/publications/purcell/psw_2005_purcell002_tietje.pdf

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acres of blue oak woodland will be permanently converted (Section 3.8.4.2) with the implementation of this Project. While Section 3.4, Biological Resources, includes an in-depth discussion of indirect and direct impacts to potentially occurring sensitive species, the permanent loss of 65 acres of blue oak woodland habitat does not appear to be considered in the indirect impacts analysis for several species including, but not limited to, foraging and nesting raptors and migratory birds, bats, and silvery false-lupine. Additionally, the permanent loss of oak woodland habitat does not appear to be considered in the Biological Resources Cumulative Effects discussion located on Page 3.21-8. Therefore, the ISMND does not offer an adequate analysis of the permanent removal of oak woodland habitat throughout the Project area, or measures to reduce permanent impacts to less than significant.

CDFW strongly recommends including an analysis of potential direct and indirect impacts resulting from the permanent removal of oak woodlands throughout the Project area. Additionally, a Habitat Restoration Plan, or similar, should be formulated, which would include measures to appropriately minimize and mitigate impacts from the permanent loss of habitat. A discussion of trees proposed to be planted onsite, any proposed offsite mitigation, monitoring, and success criteria should also be included in the Habitat Restoration Plan, if applicable.

Mitigation at a minimum of 2:1 should be strongly considered for impacts to oak woodland habitat proposed for permanent removal. This ratio would include both permanent and temporal loss. Impacts to oak woodlands may be mitigated by replanting in an appropriate area onsite, purchasing credits at a 2:1 ratio from a Mitigation Bank, or land acquisition of blue oak woodland habitat that contains two acres of preserved oak woodland habitat for every one acre of habitat removed. The goal of mitigation should be to effectively attain no net loss of oak woodland habitat. In addition, CDFW strongly encourages retaining, designing, and constructing around existing mature and healthy oak trees.

Fencing and Cattle Grazing

The ISMND indicates cattle grazing will continue throughout the subject parcel and perimeter security fencing was also indicated. CDFW understands fences are essential for controlling livestock and trespass, however, inappropriately designed or placed fencing may create serious hazards and/or barriers for wildlife. Therefore, CDFW strongly encourages the design and implementation of perimeter and livestock fencing to alleviate potential hazards to wildlife. This resource may provide useful information about wildlife friendly fencing techniques: A Landowners Guide to Wildlife Friendly Fences: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=161708>

Additionally, to alleviate the degradation of sensitive habitats and water quality within the Sacramento River watershed, and to avoid deleterious material deposits to state

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waters, responsible livestock grazing practices are recommended, including:

- Excluding livestock from surface water features using livestock-resistant/wildlife-friendly fencing techniques.
- Locating livestock alternative drinking water sources away from any surface water features.
- Restricting flood irrigation to areas where overflow cannot enter adjacent surface water features.

For information about responsible grazing practices, some resources are provided:

- The Grazing Handbook:
<https://carangeland.org/images/GrazingHandbook.pdf>
- State Waterboard's Grazing Management Measures and Practices:
https://www.waterboards.ca.gov/water_issues/programs/nps/encyclopedia/1e_graz.html

Submitting Data

CEQA requires that information developed in environmental documents be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations. (Public Resources Code section 21003(e)). Report any special status species observations and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be found at the following link:

<https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

We appreciate the opportunity to offer comments and recommendations that may assist CPUC in adequately analyzing and minimizing impacts to biological resources. If you have any questions, please contact Erika Iacona, Senior Environmental Scientist, by email at R1CEQARedding@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Tina Bartlett

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Tina Bartlett, Regional Manager
Northern Region

ec: State Clearinghouse
State.Clearinghouse@opr.ca.gov

Erika Iacona
R1CEQARedding@wildlife.ca.gov

CDFW Region 2
R2info@wildlife.ca.gov