

3.17 Public Services

This section describes the environmental setting for public services as well as potential environmental impacts to public services and associated mitigation measures under the Proposed Project.

For a discussion of other resource topics associated with public services, see Section 3.8 *Water Supply/Water Rights*, Section 3.10 *Greenhouse Gas Emissions*, Section 3.20 *Recreation*, Section 3.21 *Hazards and Hazardous Materials*, and Section 3.22 *Transportation and Traffic*.

The State Water Board received a comment expressing concern about there being a single access route to the Copco Dam area and the potential impacts of construction activities or traffic on the safety of other road users such as school busses, residents, pedestrians, livestock, and dogs. The comment also noted that the road could be damaged during construction activities. The State Water Board also received comments expressing concern related to how fire suppression efforts will be impacted and whether there would be a replacement plan for loss of the reservoirs. The State Water Board did not receive any other comments related to public services during the NOP public scoping process (see Appendix A).

3.17.1 Area of Analysis

The Area of Analysis for public services includes lands within the Project Boundary (Figure 2.2-4). This area includes the area in the immediate vicinity of Copco No. 1, Copco No. 2, and Iron Gate dams and reservoirs, and areas identified as construction/demolition and staging areas. The construction/demolition and staging areas are described in specific detail in this EIR in Section 2 *Proposed Project* and in Sections 5.3, 5.4, and 5.5 of Appendix B: *Definite Plan*. Consideration of public services also includes considering routes that would be used by public service providers, which are analyzed under Section 3.22 *Traffic and Transportation*.

3.17.2 Environmental Setting

The following section describes the environmental setting for public services, including fire protection, police protection, schools, and parks, among others.

3.17.2.1 Fire Protection

The Governor's Office of Emergency Services (CalOES) coordinates preparedness for and response to natural disasters, including fires, by activating the California Standardized Emergency Management System (SEMS) used by all California public safety agencies. Siskiyou County has a cooperative fire protection agreement with the California Department of Forestry and Fire Protection (CALFIRE). The cooperative agreement also includes: 29 Communities, 14 Fire Safe Councils, 30 Local Fire Departments, Siskiyou County Wildfire Protection Panel (including a county natural resources specialist, representatives from CALFIRE, USDA Forest Service, and other public members), Siskiyou County Board of Supervisors, CALFIRES's Siskiyou Unit Fire Prevention Bureau (including a Battalion Chief, two fire captains, and a Fire Prevention Specialist II), Volunteers in Prevention, Siskiyou County Arson Team, The California Conservation Corps, and the College of the Siskiyou Fire Program (CALFIRE 2015).

There are nine incorporated cities in the county that are responsible for fire protection within their respective cities: Yreka, Fort Jones, Etna, Weed, Mt. Shasta, Dorris, Dunsmuir, Montague, and Tulelake. Each fire protection service, mostly staffed by volunteers, is able to respond to a variety of emergency situations, including wildland fires, structure fires, earthquakes, search and rescue, civil disturbance, and hazardous materials incidents (CALFIRE 2015).

A discussion of emergency response to natural and man-made disasters can be found in Section 3.21 Hazards and Hazardous Materials and Section 3.22 Transportation and Traffic. An analysis of the loss of the reservoirs for firefighting purposes is included in Potential Impact 3.17-2 as well as Section 3.21 Hazards and Hazardous Materials. Water supply, in general, is included in Section 3.8 Water Supply/Water Rights.

The CALFIRE Siskiyou Unit serves Siskiyou County and covers more than 6,347 square miles (4,062,080 acres), with primary wildland fire responsibility for 1,269,672 acres. The CALFIRE Siskiyou Unit is comprised of 30 local fire departments and is active in local community outreach programs and public safety messages. The CALFIRE Siskiyou Unit suppression resources, at the peak of firefighting preparedness, included approximately 70 career personnel and 120 seasonal personnel (CALFIRE 2015).

The CALFIRE Siskiyou Unit has an Emergency Command Center known as the Yreka Interagency Command Center. The Yreka Interagency Command Center is located at the CALFIRE Siskiyou Unit Headquarters in Yreka and is a collaboration of CALFIRE and USDA Forest Service staff. The Yreka Interagency Command Center provides dispatching services for CALFIRE, USDA Forest Service, 30 local government departments, and five ambulance companies, most service the greater area of Siskiyou County. The Yreka Interagency Command Center is responsible for emergency call taking, dispatching, and tracking resources (CALFIRE 2015).

The CALFIRE Siskiyou Unit is divided geographically into four fire battalions: Battalion 1 – Scott Valley Battalion; Battalion 2 – Shasta Valley Battalion; Battalion 3 – Butte Valley Battalion; and Battalion 4 – McCloud Battalion. The Area of Analysis is located within the Shasta Valley Battalion region and is approximately 484,018 acres, with 376,598 acres designed as State Responsibility Area and 53,420 acres designated as Local Responsibility Area. The remaining area (54,000 acres) is designated Federal Responsible Area, generally within the Klamath National Forest and BLM lands. The Shasta Valley Battalion partners with 11 agencies, 10 Fire Safe Councils, 12 Siskiyou County Fire Departments within or bordering the Shasta Valley Battalion, and 11 cities and communities to: 1) reduce the total number of fires in the Battalion; 2) reduce the impact of large, damaging fires in the Battalion; and 3) reduce the number of campfire escapes (CALFIRE 2015).

The Shasta Valley Battalion consists of two CALFIRE stations: one in the City of Yreka and one in the community of Hornbrook. Both stations are open year round for fire permit issuance and other public services. The CALFIRE Siskiyou Unit headquarters, located at the Yreka Station, houses two Type III fire engines and one Type II dozer, the Hornbrook Forest Fire Station houses two Type III fire engines. The Hornbrook Station is located along the Interstate 5 near the California and Oregon border in Hornbrook and is committed to year round fire protection due to a contract with Siskiyou County. Paradise Craggy Lookout serves as the fire lookout for the Shasta Valley Battalion and

is only staffed with emergency workers during high fire danger days and during and after lightning storms (CALFIRE 2015).

The closest fire department to the public services Area of Analysis is Copco Lake Fire Department, which is located at the easternmost end of Copco Lake. There are 12 volunteer firefighters staffed at the Copco Lake Fire Department (Copco Lake Fire Department 2017).

Fire hazards, including wildfires, are discussed in Section 3.21 Hazards and Hazardous Materials.

3.17.2.2 Police

The Siskiyou County Sheriff's Department provides law enforcement services to the unincorporated portions of Siskiyou County and is headquartered in Yreka, with substations in Dunsmuir, Mount Shasta, Etna, Happy Camp, Dorris, Hornbrook, McCloud, and Montague (Police Department 2017). The Sheriff's Department also contracts with cities, to help with operations (Siskiyou County 2017a).

The Enforcement Division of the Sheriff's Department is the division that contains patrol functions, detective functions, civil functions, search and rescue functions, and administrative functions (Siskiyou County 2017b). The Siskiyou County Sheriff's Department's Civil Office is located in Yreka. The closest Sheriff's station to the public services Area of Analysis is the Hornbrook Station, located at 22012 G Street in Hornbrook (Siskiyou County 2017c).

The California Highway Patrol is responsible for law enforcement on State and Federal highways in the Area of Analysis. There are two major thoroughfares that transverse the area, Interstate-5 and US 97. In addition, area patrols include State Route (SR)-3, SR-96, SR-139, SR-161, SR-263, SR-265, and hundreds of miles of unincorporated county roads. The main office for this region, which includes a communications center, is located in Yreka (CHP 2017a). The Yreka Communications Center dispatch area encompasses all of Siskiyou County, and parts of Modoc and Shasta counties. The Yreka Communications Center dispatches for: the Yreka and Mt. Shasta area offices; and the Dunsmuir Grade Commercial Vehicle Enforcement Facility (CHP 2017b). The Yreka Communications Center and the Yreka Area Office are located at 1739 South Main Street, Yreka, CA 96097 (CHP 2017b).

3.17.2.3 Medical Services

No Medical Services are provided directly within the Area of Analysis for public services. The closest Medical Services are provided at Fairchild Medical Center, which is located in Yreka, 20.2 miles from the Copco community (FMC 2017). The second closest medical facility is the Butte Valley Health Center, located in Dorris (BVHC 2017). The Butte Valley Health Center is 33.2 miles from the Copco community. The closest two hospitals nearby, include: Asante Rogue Regional Medical Center, located in Ashland, OR (ARRMC 2017), 47.7 miles from Copco, CA; and Sky Lakes Medical Center, located in Klamath Falls, OR (SLMC 2017), 51.8 miles from Copco, CA.

3.17.2.4 Schools

The Siskiyou County Office of Education oversees the school districts and educational programs to, “provide quality assistance and resources to schools as they deliver equitable learning opportunities for all students and provides a menu of powerful services to schools and communities supporting the learning goals of each child and family” (SCOE 2017a).

Siskiyou County has several charter schools, elementary schools, high schools, alternative education schools, and community day schools (SCOE 2017b). Yreka is served by the Yreka Union Elementary School District and the Yreka Union High School District. Bogus Elementary, Hornbrook Elementary, Willow Creek Elementary, Meadows Union Elementary, Little Shasta Elementary, and Montague Elementary are close to the Area of Analysis (Great Schools 2017).

Bogus Elementary School is the closest school to the public services Area of Analysis. It is 5.4 miles east of the Iron Gate Dam (Google Maps 2017a), and 5.3 miles southeast of Copco Dam No.1 and No.2 (Google Maps 2017b).

Bogus Elementary School is a K-8 grade, two-room school with a current enrollment of 14 students. There is one full-time teacher/principal/superintendent, one full-time instructional aide who additionally serves as part-time bus driver and part-time cafeteria coordinator/cook (Bogus Elementary School 2017). Bogus Elementary School is located at 13735 Ager-Beswick Rd., Montague, CA 96064-9434.

3.17.2.5 Parks, Park Facilities, and Other Public Facilities, including the Existing Reservoirs

The Area of Analysis for public services contains a number of recreational facilities that currently are well used primarily during the summer months. The reservoirs associated with the Lower Klamath Project, three of which are in California, could be considered public facilities. These park and other facilities are described in Section 3.20 Recreation.

3.17.3 Significance Criteria

Criteria for determining significance for public services are based on Appendix G of the CEQA Guidelines (California Code of Regulations title 14, section 15000 et seq.) and professional judgment. Effects on public services are considered significant if the Proposed Project would result in one or more of the following conditions or situations:

- Substantially increase public service response times for emergency fire, police, and medical services due to construction and demolition activities.
- Eliminate a long-term water source for wildfire services, and the associated increase in response times.
- Create a substantial adverse effect on schools services and facilities.

3.17.4 Impact Analysis Approach

The approach to the impact analysis for public services focuses on whether the Proposed Project will result in impairing existing public services or create a need for increased services related to fire, police, or medical facilities. The long-term effects of

the Proposed Project would result in elimination of a long-term water source for wildfire services (e.g., the reservoirs) and the associated increase in response times. Otherwise, the long-term effects of the Proposed Project would be a reduction in hydropower operation activity and existing recreation, which could reduce the risk and need for emergency services, as a result of reduced traffic from those uses. Whether future land uses will create traffic that would meet or exceed the existing condition is, at this point, speculative. The Proposed Project, the removal of the four dams and associated facilities, will also not create a long-term need for additional school services or facilities.

This analysis includes a focus on short-term construction-related activities. Analysis of peak construction-related activity recognizes that other Project-related activities, including those that will occur prior to and following peak periods, would result in less of a potential impact because the risk of the need for emergency services is reduced with less use occurring in the area. The following analysis and referenced mitigation measures included for the peak construction-related activities would also be relevant to non-peak activities. These potential impacts would be considered short-term impacts. The analysis for the adequacy of public services for the Proposed Project is further addressed in several other sections including Section 3.21 Hazards and Hazardous Materials and Section 3.22 Transportation and Traffic.

Potential impacts related to maintaining acceptable service ratios, response times, or other performance objectives for any of the public services during the construction-related activities would be dependent on the Proposed Project's forethought in providing an Emergency Response Plan, Fire Management Plan, Traffic Management Plan (Traffic Management Plan), and Hazardous Materials Management Plan (Hazardous Materials Management Plan). These have been included in Appendix B: Definite Plan – Appendices O1 – O4. Mitigation measures have been added in Section 3.21 Hazards and Hazardous Materials and Section 3.22 Transportation and Traffic to address these concerns.

Finally, the analysis addresses whether the Proposed Project will impact school services or facilities during the period of activity for the Proposed Project. The effect on parks, park facilities, and other public facilities, including the existing reservoirs is analyzed in Section 3.20 Recreation.

3.17.5 Potential Impacts and Mitigation

Potential Impact 3.17-1 Increased public services response times for emergency fire, police, and medical services due to construction and demolition activities.

The Proposed Project could result in a significant impact if it results in substantial increases in emergency response times within the Area of Analysis. In general, development of an adequate Traffic Management Plan (Traffic Management Plan) would mitigate the potential short-term impacts of construction-related traffic and therefore minimize changes to public service response time. Under the Proposed Project, demolition and construction areas would be closed off to the public to reduce hazards. Due to the rural nature and low concentration of roads in the area, most existing roads are currently used, and would continue to be used, by emergency responders and for evacuation routes in the event of fire or other emergencies. The use of these roads for construction activities could interfere with emergency response and evacuation. The potential for substantial interruptions to road access for property owners within the public

services Area of Analysis during construction activities would not be a significant impact since alternative routes are or would be made available as part of the proposed Traffic Management Plan (Traffic Management Plan) (Section 3.22 *Transportation and Traffic*). The KRRC's Traffic Management Plan is a specialized program tailored to minimize impacts by applying a variety of techniques such as *Public Information, Motorist Information, Incident Management and Construction Strategies*. The major objectives of the Traffic Management Plan are to maintain efficient and safe movement of vehicles through the construction zone covered by activities in the Definite Plan and to provide public awareness of potential impacts to traffic on both haul routes and access roads to the four dams and associated facilities. The Traffic Management Plan outlines the structure and key requirements that would be incorporated by the KRRC's contractor into a final Traffic Management Plan. The final Traffic Management Plan would be informed by KRRC's contractor's specific means and methods for construction, which could refine the approach to access and traffic management. KRRC proposes that the final Traffic Management Plan would meet applicable regulatory permit requirements, as well as applicable state and local ordinances, as appropriate (Appendix B: *Definite Plan – Appendix O2*).

Construction activities would involve staging and stockpiling areas and equipment that would be kept on-site for the duration of construction. The Limits of Work (Figures 2.7-2 and 2.7-4) would include activities that may result in accidental spills of flammable liquids or use of equipment that generates heat, such as welding, grinding, torch-cutting, gas and diesel generators. Other construction activities could result in open sparks or flame in vegetated open space that could further aggravate the risk of fire. Emergency and Security services would be provided by the construction contractor, therefore the Proposed Project would not increase the need for emergency services or the number of emergency responders. What is important for the reduction of impacts is that all construction workers have the knowledge and resources to respond to emergencies and all emergency preparation and work are overseen by a designated health and safety manager, which is proposed as part of the Proposed Project. In addition, the Proposed Project (Appendix B: *Definite Plan*) proposes that responding agencies and departments are made aware of the activities during the construction period so that they can implement their existing regulatory framework, establish an emergency contact process, and include inspections as needed throughout the process.

Mitigation Measure HZ-1 and Recommended Measure TR-1 would reduce the potential impacts related to construction activities since these measures require that the KRRC and its contractor(s) for the Proposed Project submit the additional documentation/details included in the final Emergency Response Plan, Fire Management Plan, Traffic Management Plan, and a Hazardous Materials Management Plan, and they work with applicable agencies prior to the start of construction. Implementation of these two measures would reduce the potential for a short-term increase in personal and public health and safety risks due to the Proposed Project as related to emergency response services. There would be no long-term impacts due to the Proposed Project construction-related activities since the construction would be completed in the short term.

Most of the roads within the Area of Analysis are currently owned or managed by PacifiCorp (Section 3.22.2.3 *Road Conditions*). PacifiCorp would continue to own and manage the roads contained within Parcel A and KRRC would own and manage the roads contained in Parcel B (see Figure 3.14-4). Section 3.21 *Hazards and Hazardous*

Materials discusses the transport of hazardous materials, emergency, and wildfire potential and includes Mitigation Measure HZ-1 to address potential impacts to emergency response under the Proposed Project. As discussed in Section 3.22 *Traffic and Transportation*, the Proposed Project also includes an Emergency Response Plan. Recommended Measure TR-1 includes coordination between the Traffic Management Plan and Emergency Response Plan and additional detail necessary to reduce impacts.

Overseeing development and implementation of the final Traffic Management Plan and final Emergency Response Plan does not fall within the scope of the State Water Board's water quality certification authority. While the KRRC has stated its intention to reach enforceable good citizen agreements that will be finalized and implemented, at this time the Traffic Management Plan and Emergency Response Plan are not finalized and the State Water Board cannot require their implementation. Accordingly, the State Water Board anticipates that implementation of the final Traffic Management Plan and Emergency Response Plan, including the additional details in Recommended Measure TR-1 and any modifications developed through the FERC process that provide the same or better level of protection for transportation and traffic would reduce impacts to less than significant. However, because the State Water Board cannot ensure implementation of the final Traffic Management Plan and final Emergency Response Plan, it has determined the impact in this Draft EIR to be significant and unavoidable.

Significance

Significant and unavoidable with mitigation

Potential Impact 3.17-2 The Proposed Project's elimination of a long-term water source for wildfire services could substantially increase the response time for suppressing wildfires.

The Proposed Project would result in the removal of one readily available water source for wildfire services or increased emergency response times if other sources of water are not as readily available. Under the Proposed Project, removal of the Copco No.1, Copco No. 2, and Iron Gate reservoirs would remove a long-term water source for fire suppression crews after the reservoirs are removed. The removal of the reservoirs could increase turn-around time for helicopters or ground crews refilling with water for fire abatement purposes. However, the initial response times for existing aircraft with fire retardant would not be changed by the loss of the reservoirs. Following dam removal, helicopters and ground crews would still be able to extract water from the Klamath River (both the current channel and the channel reaches to be exposed in the current reservoirs following drawdown), Lake Ewauna, and Upper Klamath Lake. Retrieving water directly from the Klamath River is consistent with how wildfires are suppressed along the Klamath River downstream of Iron Gate Dam under current conditions.

With respect to Klamath River access, most helicopter water tanks require three feet of water depth to fill properly, so only deeper pools in the Klamath River would be able to be used by helicopters. CALFIRE uses the closest available water source that is suitable for fire-fighting, where suitability is determined by local conditions including water flow, depth of pool (2- to 3-foot minimum), amount of debris in pool, shoreline vegetation, and surrounding terrain. Rotor blade length and the length of bucket lines are also determinants, since there must be a safe amount of space to enter and exit the pool site. Individual pilots use their discretion to determine the closest and safest locations from which to withdraw water.

Analysis of aerial photos (Google Maps 2018) suggests the presence of pools with suitable conditions for helicopter filling in the currently free-flowing reaches of the Middle and Upper Klamath River, particularly in the reaches between Copco No. 1 and J.C. Boyle reservoirs and downstream of Iron Gate Dam. While source water would be available in the Klamath River in pools located in the river reaches exposed following reservoir drawdown, the travel time involved in accessing the newly formed pools would be greater than that for the existing Lower Klamath Project reservoirs because retrieval of water from relatively smaller, more narrow, river pools is more difficult than dipping directly from the broad water surface of a lake or reservoir, and only one helicopter at a time would have access to a given river pool versus multiple helicopters that can draw at one time from a large reservoir. Thus, response and travel times between water fills for helicopter crews would be expected to increase with the loss of the reservoirs. Wildfires can spread at a rapid speed, and involve high risks. Any amount of additional response time compared with existing conditions could result in a substantial increased risk of loss, injury, or death involving wildland fires and this would be a significant impact.

To compensate for the loss of reservoir water supply, the Proposed Project includes providing alternate water supply through dry hydrants that would be accessible to ground crews following removal of the dams. Flows in the Klamath River and tributaries are not expected to substantially change post-dam removal, as compared to current flows, and firefighting ground crews could still use the river as a water supply as long as physical access to water is provided. Dry hydrants are passive, unpressurized systems, with a screened intake placed in the channel above the channel bed. An above-ground fire hose is used to connect the intake to truck-mounted pumps (Figure 3.17-1). Placement of the dry hydrant must be in a location of satisfactory depth (during dry conditions), flow rate, and channel stability. The Definite Plan states that dry hydrants are commonly used as water supply for fighting fires in rural areas, and typical dry hydrants and fire truck pumps can supply over 1,500 gallons per minute, which is sufficient for rapid filling of typical water tankers and firefighting apparatus (Appendix B: *Definite Plan – Appendix O1*).

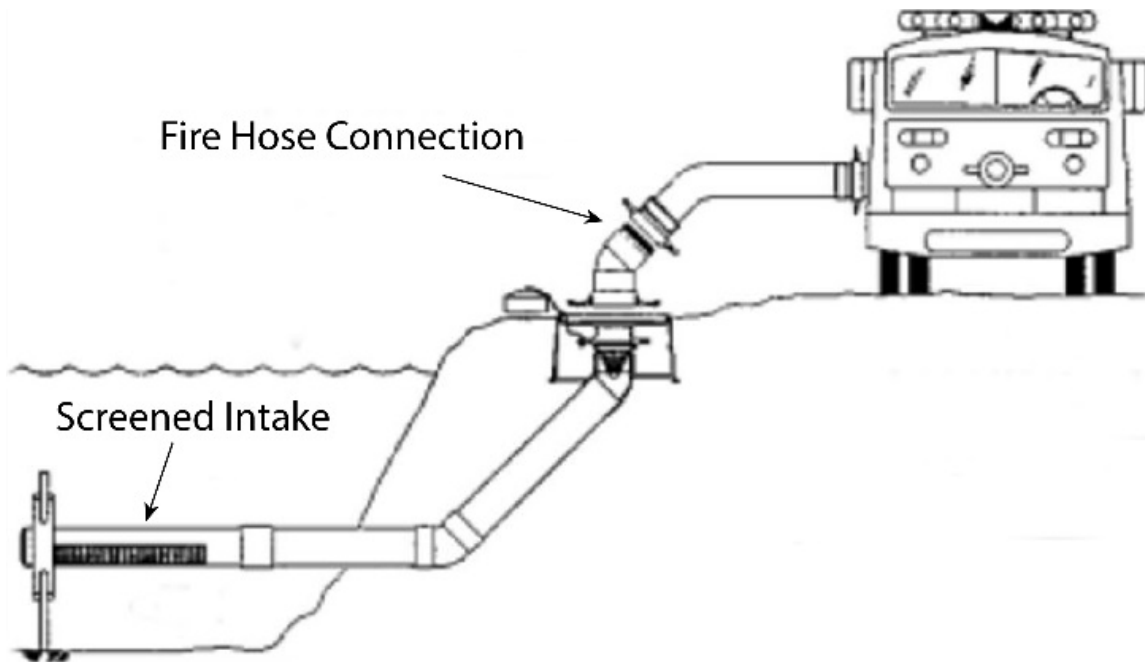


Figure 3.17-1. Diagram of Typical Dry Hydrant System.

Potential dry hydrant sites located within PacifiCorp or state-owned property boundaries that leverage existing, permanent infrastructure (e.g., fire stations, bridges, roads, and boat launches), would offer proximity and ease of access to current or anticipated post-removal Klamath River or tributary channels. Bridges and crossings would be desirable given the increased certainty of access to water post-removal and the ability to use the structure for mounting the dry hydrant rather than excavating earthen material for pump installation.

At Copco No. 1 Reservoir and the reach of the Klamath River upstream of the reservoir, eight potential dry hydrant sites were identified (Figure 3.17-2). Access to the mainstem Klamath River upstream of Copco No. 1 Dam after removal would be limited if the channel reoccupies its historical alignment as predicted. The historical Klamath River had a meandering shape in the Copco No. 1 Reservoir, and the mainstem would likely be either far from existing roads or difficult to access due to the presence of steep, high relief bluffs particularly near the Copco No. 1 Dam site.

Potential dry hydrants at Copco No. 1 Reservoir are labeled CP1 through CP8. CP1 would be located along Copco Road adjacent to where Beaver Creek would be expected to run post-removal, but, with sufficient flow, could be moved to where Copco Road crosses Beaver Creek upstream of the confluence with East Beaver Creek. CP2 would be located along the historical Klamath River and Copco Road downstream of Raymond Gulch at a location where the valley topography is less steep. CP3 would be located near the historical confluence of the Klamath River and Deer Creek off Patricia Avenue, close to Copco No. 1 Reservoir Fire Station. CP4 would be sited where Ager Beswick Road crosses Deer Creek. CP5 would be located at the Copco Road bridge over the Klamath River at the eastern margin of the reservoir adjacent to the Copco Lake Fire Department Station A. CP6 would be located on a bridge over the Klamath River upstream of the current influence of Copco 1 Dam, accessible off Ager Beswick Road.

CP7 would be located on a small bridge over the Klamath River off Ager Breswick Road and immediately upstream of the Shovel Creek confluence. CP8 would be located at a fishing access area off Ager Breswick Road where a rapid holds grade to maintain a deeper pool for water extraction.

At Iron Gate Reservoir, four potential dry hydrant locations were identified and labeled IG1 through IG4 (Figure 3.17-3). IG1 would be sited at the Lakeview Road bridge crossing over the Klamath River, downstream of Iron Gate Dam and adjacent to the Iron Gate Hatchery. IG2 would be located in the vicinity of the Camp Creek campground where Copco/Iron Gate Lake Road crosses Camp Creek. IG3 would be located at the bridge where Copco/Iron Gate Lake Road crosses Jenny Creek. IG4 would be sited where the Daggett Road bridge crosses the Klamath River, adjacent to the Fall Creek confluence and Copco/Iron Gate Lake Road.

The proposed dry hydrants are likely to be of limited use for firefighting compared with existing conditions because only ground crews can access them (i.e., they are of no use to aerial crews that can access the reservoirs under existing conditions). Hook-ups to the dry hydrants would require standardized equipment for all vehicles and existing CALFIRE pumper trucks would require special equipment such as hard suction lines (a flexible hose would collapse) to successfully draft from the dry hydrants. The ground crews would need to be able to get close to the river to draft from the dry hydrants because fire trucks typically can only lift water over short vertical distances (i.e., 10 to 14 feet, with a maximum 15-foot height from the intake) and drafting from bridges may require too much lift. Decreased response time associated with dry hydrants as compared with aerial crew access of reservoir water via helicopters would be a significant impact since it could increase the risk of loss, injury, or death involving wildland fires. Direct withdrawal from the river using a boat ramp, pumping stations equipped with pumps connected to wells or deep pools in the river, above-ground storage tanks with ready access for transferring water to pumper trucks, are likely to be better options than the dry hydrants proposed by KRRC because these alternatives would be easier to use and thus would reduce ground crew response time.

In the long term, the loss of the reservoirs, which are currently part of the existing conditions, would result in a substantial decrease in fire protection involving wildland fires due to longer response times and limitations on access to Klamath River water for fighting fires within the Area of Analysis for public services. While the proposed dry hydrants would provide a source of water to ground crews for firefighting, they do not offer the same degree of access as helicopter use of the reservoirs for wildfires occurring in the vicinity of the Lower Klamath Project, for which the reservoirs are the closest and safest source of water for aerial crews. One option that would assist in mitigating this impact would be to include appropriately placed dip ponds within the Proposed Project's restoration areas.

Recommended Measure PS-1 requires the KRRC and/or its Contractor(s) to develop, in consultation with the CALFIRE Siskiyou Unit, an updated Fire Management Plan that identifies long-term water sources for helicopter and ground crews (including construction and use of proposed dry hydrants, dip ponds, or other alternatives). Updating the CALFIRE Siskiyou Unit's Fire Management Plan with available sources of water for helicopters and ground crews following dam removal provides new information to support fire services in the absence of the reservoirs. The State Water Board anticipates that in the absence of the reservoirs, the identification and use of alternative

water sources (e.g., dip ponds, river pools suitable for helicopter drafting, dry hydrants) for both ground and helicopter crews that are developed through the FERC process would significantly ameliorate response times and provide a level of protection to substantially reduce the public's risk of loss from wildfires, thereby reducing impacts to less than significant in many instances. However, where suitable replacement water sources cannot be identified in close proximity to a fire in a location for which the reservoirs would otherwise have been the nearest water source, long-term impacts to the public's risk of loss from wildfires remain significant and unavoidable.

Additionally, the terms of an updated Fire Management Plan and its incorporation of Recommended Measure PS-1 are not within the State Water Board authority, and the State Water Board therefore cannot ensure implementation of this measure. Thus, the State Water Board has determined the long-term impact in this EIR to be significant and unavoidable.

Recommended Measure PS-1 – Fire Management Plan.

The KRRC and/or its Contractor(s) shall develop a post-dam removal Fire Management Plan in consultation with the CALFIRE Siskiyou Unit. The Fire Management Plan shall identify long-term water sources for helicopter and ground crews (including construction and use of proposed dry hydrants, dip ponds, or other alternatives). After reaching agreement on the Fire Management Plan with CALFIRE Siskiyou Unit, the KRRC and/or its Contractor(s) shall submit the Final Fire Management Plan to the CALFIRE Siskiyou Unit and implement any portions of the plan for which the KRRC has identified responsibilities.

Significance

Significant and unavoidable



Figure 3.17-2. Locations of Potential Dry Hydrants for Copco No. 1 Reservoir.

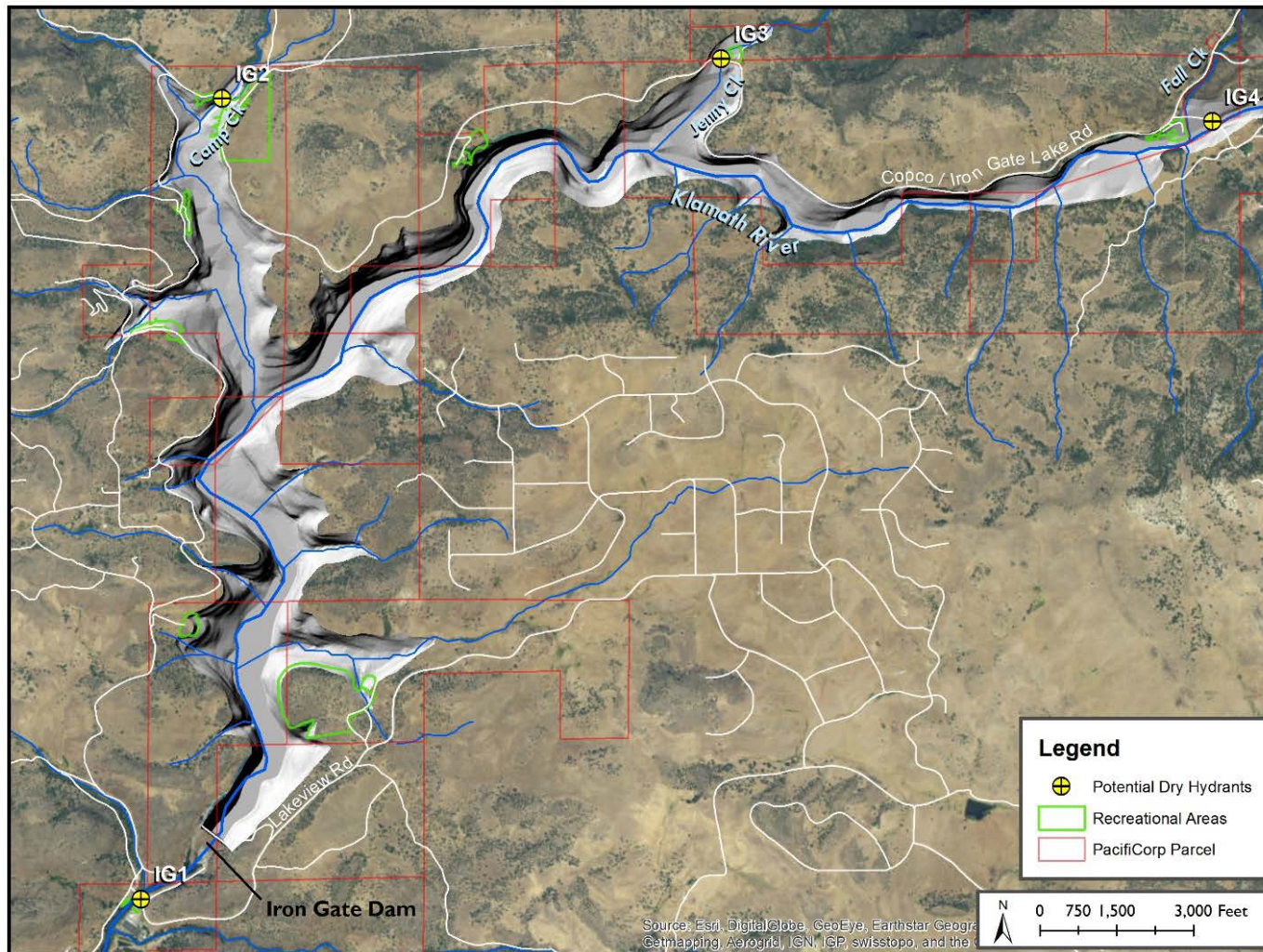


Figure 3.17-3. Locations of Potential Dry Hydrants for Iron Gate Reservoir.

Potential Impact 3.17-3 Potential effects on school services and facilities.

In the short term, Proposed Project construction activities could result in adverse effects on school services or facilities if it results in increased student enrollment that exceeds the capacity of the nearby schools. While the Proposed Project could have short-term impacts to school facilities and services during the construction period if a number of construction workers move into the area during the construction period, related impacts would be speculative as the contracting firms have not been selected. According to the Proposed Project schedule (Table 2.8-1), peak construction-related activity would primarily occur when school would not be in session. Therefore, the Proposed Project would not result in short-term impacts to school services and facilities.

In the long term, the Proposed Project does not have the potential to affect schools in terms of additional students or longer bus routes, nor would it generate the need for additional classrooms or school services. The removal of PacifiCorp housing related to the Lower Klamath Project dams and associated facilities may reduce the need for school facilities, depending on the occupancy of its residences. However, since the number of residences is small (i.e., one occupied residence at Copco No. 1 and No. 2 dams and two occupied residences at Iron Gate Dam), there would be no impact on school services and facilities due to the Proposed Project in the long term.

Significance

No significant impact

3.17.6 References

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