

3.18 Utilities and Service Systems

including wastewater, stormwater, and solid waste, as well as potential environmental impacts to utilities and service systems due to implementation of the Proposed Project. Additional information related to utilities and service systems is discussed in Section 3.8 *Water Supply and Water Rights*, 3.21 *Hazards and Hazardous Materials*, and 3.22 *Transportation and Traffic*.

The State Water Board received several comments during the NOP public scoping process regarding potential impacts to Yreka's municipal water supply and the need to realign the water supply pipeline as part of dam removal. These issues are addressed in Section 3.8 *Water Supply/Water Rights*. The State Board also received comments regarding Clean Energy Sources and resulting lower utility rates. These issues are addressed in Section 3.10 *Greenhouse Gas Emissions*. The State Water Board did not receive any other comments related to utilities and service systems. The summary of comments received during the NOP public scoping process, as well as the individual comments themselves, are presented in Appendix A.

3.18.1 Area of Analysis

The Area of Analysis for utilities and service systems includes lands within the Project Boundary (Figure 2.2-4). The Area of Analysis for solid waste also includes consideration of disposal capacities for accommodating solid wastes at the Yreka Transfer facility near Hornbrook, CA, the Class 1 Landfill near Anderson, CA, and the Dry Creek landfill site in White City, OR., even though these areas are not shown as part of the Project Boundary.

3.18.2 Environmental Setting

The following section describes the environmental setting for utilities and service systems that could be affected by implementing the Proposed Project.

3.18.2.1 Wastewater

Siskiyou County does not provide wastewater treatment within the Area of Analysis for utilities and service systems. Generally, sewer and septic facilities are offered by local municipalities (SCEDC 2018). Yreka has one wastewater treatment plant that treats and disposes of both domestic and industrial sewage generated within the city's boundaries (City of Yreka 2018). The facility is designed to accommodate up to 1.3 million gallons per day (mgd) of average dry weather flow. Yreka's General Plan reported that average dry weather flow in 2003 was between 0.7 and 0.9 mgd (City of Yreka 2003).

All the communities in unincorporated areas of Siskiyou County, including the rural communities of Hornbrook and Copco Village, have a community wastewater treatment system, onsite septic systems (USBR 2012), or have arranged to use an adjacent city's wastewater treatment facilities. There are five community service districts that meet the demands for sewer and wastewater treatment in Siskiyou County (SCCDD 2014); these are all located outside of the Area of Analysis. The Area of Analysis is served by individual sewage disposal systems (i.e., septic tanks). These are allowed within unincorporated Siskiyou County through permits with the Siskiyou County Public Health

Department (PacifiCorp 2015). The Siskiyou County Public Health Department applies the Sewage Disposal Code to any new construction, alterations, repairs, reconstruction and removal of individual sewage disposal systems within the unincorporated areas of Siskiyou County (Siskiyou County 2018a).

Recreational facilities located along the shoreline of Copco No.1 and Iron Gate reservoirs have installed vault toilets (i.e., enclosed toilets that require periodic removal of waste generated) that are serviced routinely during usage periods with pumper trucks. The trucks discharge the collected wastewater into Yreka's sewer system or other permitted facility.

The Proposed Project will require the use and maintenance of portable chemical toilets on site during construction activities. The quantity is determined by the number of workers.

3.18.2.2 Stormwater

Stormwater is managed by the individual municipalities within Siskiyou County. However, no municipal stormwater systems are located within the Area of Analysis for utilities and service systems. Stormwater captured by impervious surfaces at existing Lower Klamath Project facilities and the local communities of Hornbrook and Copco Village is conveyed by natural drainages. The Lower Klamath Project facilities do not have any stormwater disposal systems (FERC 2004).

3.18.2.3 Water Supply

The Proposed Project Area of Analysis is in an unincorporated area of Siskiyou County and is not served by any water district. Water supplies are provided to rural residences near the Lower Klamath Project facilities by private groundwater wells (USBR 2012). Additional information about surface and groundwater is described and analyzed in Section 3.7 *Groundwater* and 3.8 *Water Supply/Water Rights*.

3.18.2.4 Solid Waste

Solid waste in Siskiyou County is handled by the County's General Services Sanitation Division which provides a fee-based solid waste disposal system for the entire county. The county operates five recycling and transfer sites: Black Butte Transfer Station, Happy Camp Transfer Station, Salmon River Area Collection Facility, Tulelake Transfer Station, and Yreka Transfer Facility (Siskiyou County 2018b). The Proposed Project site is within the jurisdictional boundaries of the Siskiyou County Integrated Solid Waste Management Regional Agency (CalRecycle 2018).

The Siskiyou County Source Reduction and Recycling Element (SRRE) establishes goals and methodologies for compliance with California AB 939, which establishes 50 percent diversion of solid waste from landfills. In 2017 CalRecycle found the County to be in substantial compliance with AB 939. The County regulates garbage and refuse disposal through the Siskiyou County Solid Waste Ordinance. (Siskiyou County 1963).

The Proposed Project proposes to dispose of solid waste at the County transfer station at the former landfill site on Oberlin Road, located two miles southeast of Yreka, California, which is the nearest transfer station that could be used for recycling and

waste disposal/transfer during dam demolition. The transfer station is permitted to accept general residential, commercial, and industrial refuse for disposal, including municipal solid waste, construction and demolition debris, green materials, and agricultural debris. The Yreka Transfer Facility has a capacity of 100 tons per day. Currently, solid waste is transferred approximately 45 miles from the Yreka Transfer Facility to the Dry Creek Landfill facility near White City Oregon. In 2018 this facility had a total capacity of 76,800,000 tons with a life projected at over 100 years (Dry Creek Landfill 2018).

Hazardous materials, including batteries, paints, treated wood waste, and other hazardous materials, must be disposed at certified Class I landfill facilities, which are lined to prevent the contamination of underlying soils and groundwater. The Anderson Landfill in Anderson, California, is located 122 miles south of Hornbrook, California, and is permitted to accept hazardous waste. The Anderson Landfill had an estimated remaining capacity of 11,914,025 cubic yards (72 percent of capacity remaining) in 2008, with an anticipated closure date of 2055 (CalRecycle 2018). Some special wastes are also accepted at the Dry Creek Landfill facility located 45 miles north of Hornbrook, California, but they would require pre-approval prior to disposal.

Estimated quantities of solid waste are described in Section 2.7.1 *Dam and Powerhouse Deconstruction*, as well as the Definite Plan for the Lower Klamath Project (Appendix B: *Definite Plan – Tables 5.3-3, 5.4-3 and 5.5-3*), and are much less in volume than the limitations noted above, as discussed in Potential Impact 3.18-4.

3.18.3 Significance Criteria

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

- Require or result in the construction of new wastewater treatment and/or disposal facilities or expansion of existing facilities, due to inadequate capacity to serve the Proposed Project's anticipated demand or where the construction of such facilities could cause significant environmental impacts.
- Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts.
- Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.
- Violate applicable statutes and regulations related to solid waste.

3.18.4 Impact Analysis Approach

The approach to analyzing potential impacts related to utilities and service systems considers existing conditions as the baseline for utilities. Unlike many other projects, the Proposed Project would result in reduced long-term utility and services use due to the reduction of use from the operation of the dam facilities. Therefore, the majority of the impact analysis focuses on potential short-term, construction-related impacts associated with construction activities.

Of primary concern for short-term impacts is the export of solid waste from construction during construction activities before, during, and after reservoir drawdown. Short-term waste export is described in the Project Description. Hazardous material removal is analyzed in Section 3.21 *Hazards and Hazardous Materials*. Transport of hazardous materials and Section 3.22 *Transportation and Traffic*.

Water Supply is analyzed in Section 3.8 *Water Supply/Water Rights*.

Local regulations pertaining to impacts analyzed in this section include Siskiyou County General Plan policies, County stormwater regulations, onsite wastewater treatment system regulations for removal of septic systems and requirement for chemical toilets (Siskiyou County Code of Ordinance Title 5, Chapter 2 Sewage Disposal), and solid waste regulations such as the countywide Source Reduction and Recycling Element and Siskiyou County Code of Ordinance Title 5, Chapter 1 Garbage and Refuse Disposal.

3.18.5 Potential Impacts and Mitigation

Potential Impact 3.18-1 The Proposed Project could result in the construction of new wastewater treatment facilities or expansion of existing facilities, due to inadequate capacity to serve the Proposed Project's anticipated demand or where the construction of such facilities could cause significant environmental impacts. There are no municipal wastewater treatment facilities within the Area of Analysis for utilities and service systems. Siskiyou County regulates individual onsite wastewater treatment facilities (septic systems) through its Sewage Disposal Code (Siskiyou County Code of Ordinance, Title 5, Chapter 2 Sewage Disposal), implemented by the Siskiyou County Environmental Health Division.

Within the Area of Analysis for utilities and service systems, the area in which wastewater is generated includes wastewater collection facilities at recreation sites, where wastewater is pumped from vaults, then hauled to and disposed of at permitted sites (i.e., Yreka Wastewater Treatment Plant). The Proposed Project includes elimination of some of the recreational sites, resulting in removal of their wastewater facilities. As part of the removal of existing systems or for any new recreational facility proposed each facility would need to meet applicable wastewater system design requirements (i.e., Siskiyou County Code of ordinance, Title 5, Chapter 2 Sewage Disposal). Other wastewater treatment systems within the Area of Analysis consist of individual onsite wastewater treatment systems (i.e., septic systems). The septic tanks associated with PacifiCorp housing would be removed under the Proposed Project¹⁶⁷. Those systems associated with surrounding residential or commercial uses would not be affected by the Proposed Project.

¹⁶⁷ Potential Impact 3.21-1 analyzes potential impacts due to the routine transport, use, or disposal of hazardous materials associated with the Proposed Project, including the removal and disposal of septic tanks. Additionally, note that the State Water Board has authority to review and approve any final plan developed to address removal and disposal of septic tanks through its water quality certification under Clean Water Act Section 401. The State Water Board has issued a draft water quality certification which sets forth requirements for hazardous materials management, including proper removal and disposal of septic tanks, as Condition 11.

The Proposed Project would make use of portable chemical toilet facilities during construction activities, which require providing adequate toilet facilities for work crews that are regularly cleaned, pumped, and have wastes disposed of by the toilet providers. Both County and State regulations dictate requirements for proper numbers of facilities and sanitary conditions. Based on Table 2.7-8 (workforce projections), the need for toilet facilities would be limited to the short-term (i.e., dam removal years 1 and 2) when construction activities and the number of workers (average 30 to 40) at each of the three California sites would co-occur. As closure of the existing Lower Klamath Project recreational facilities would occur prior to dam removal construction activities, there would be no overlap in recreational user wastewater generation and construction worker wastewater generation, and thus no substantial increase in the need for proper wastewater disposal at existing municipal treatment facilities due to the Proposed Project. Estimated traffic flow to recreational facilities under existing conditions is 166 visits/trips per day, compared to projected dam removal construction worker traffic flow of 105 average and 175 peak trips per day (see Potential Impacts 3.22-1 and 3.22-2). Based on these traffic flow estimates, overall construction worker requirements for toilet facilities during dam removal activities would be similar to that of recreational users under existing conditions and thus the Proposed Project would not result in the need for new treatment and/or disposal facilities or expansion of existing facilities, where the construction of such facilities could cause significant environmental impacts, and there would be no impact.

Since the total area of construction-related activities for the Proposed Project amounts to greater than one acre, the Proposed Project would be required to obtain coverage under the State Water Board Construction General Permit (2009-0009-DWQ as amended by 2010-0014-DWQ and 2012-0006-DWQ) (CGP). Each of the proposed construction areas, including staging, stockpiling, onsite disposal, and access-related areas, must be covered by the CGP. The CGP requires the applicant to address such items as employee wastewater generated during construction and spill containment and clean-up. Thus, meeting CGP requirements for onsite toilet facilities for short-term use by construction crews would not result in a significant impact as there will not be an increased need for permanent wastewater treatment facilities or an anticipated demand for additional wastewater treatment facilities.

Significance

No significant impact

Potential Impact 3.18-2 The Proposed Project could require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts. There is no existing formal stormwater collection system in the Area of Analysis for utilities and service systems. Each of the proposed construction areas, including staging, stockpiling, on-site disposal, and access-related areas, must be covered by the CGP. This would require the applicant to address items such as erosion and sediment control, stormwater, spill prevention and containment, and site cleanup during the short-term construction period (two to three years), but would not require construction of new stormwater drainage facilities or expansion of existing facilities.

Significance

No significant impact

Potential Impact 3.18-3 The Proposed Project could exceed permitted landfill capacity to accommodate the project's solid waste disposal needs.

Potential Impact 3.18-4 The Proposed Project could violate applicable statutes and regulations related to solid waste.

The below analysis applies for both Potential Impacts 3.18-3 and 3.18-4.

Overall, the total volume of waste generated by the Proposed Project would be approximately 1.4 million cubic yards (see Table 2.7-3 for estimated quantities of waste disposal for Copco No. 1 Dam, Table 2.7-5 for Copco No. 2 Dam, and Table 2.7-7 for Iron Gate Dam). For the Proposed Project, the vast majority of waste (i.e., soil and concrete) generated by demolition of the Lower Klamath Project dam complexes would be disposed of onsite and would not require transport to a landfill, thereby providing a substantial diversion of wastes meeting the County's AB 939 requirements. The Proposed Project would make use of onsite disposal options for appropriate construction debris in keeping with applicable regulations related to solid waste disposal.

Waste material exported from the Proposed Project sites to the Yreka Transfer Station would amount to less than 15,000 cubic yards. The Yreka Transfer Station is permitted to accept up to 100 tons per day of general residential, commercial, and industrial refuse for disposal, including municipal solid waste, construction and demolition debris, green materials, and agricultural debris. Siskiyou County requires waste diversion, therefore solid wastes sent to the Transfer Facility will need to be sorted at the construction site. Volumes exceeding the daily limit of 100 tons per day will need to be hauled by the contractor, most likely to the Dry Creek Landfill, approximately 45 miles north of Hornbrook, California. The Proposed Project also would require disposal of approximately 700 tons of treated wood waste from the wooden staves at Copco No. 2 Dam, where the treated wood is considered a hazardous material. This and other hazardous materials must be disposed at facilities certified to receive them. The Anderson Landfill in Anderson, California, is located 122 miles south of Hornbrook, California, and is a Class I facility, lined to prevent contamination of underlying soils and groundwater, and permitted to accept hazardous waste, including treated wood waste. Section 3.21 *Hazards and Hazardous Materials* also addresses the volume and type of construction-related debris, particular hazardous wastes and the location of disposal.

Based on the anticipated volume of waste generation for the Proposed Project and the above identified capacities for local landfill facilities (described in Section 3.18.2.4 *Solid Waste*), there is sufficient permitted capacity to accommodate the solid waste disposal needs of the Proposed Project, in keeping with applicable statutes and regulations related to solid waste.

Significance

No significant impact

3.18.6 References

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