

Attachment D

Written Scoping Comments

Boris Sanchez, CPUC
c/o Ascent, Attn: Heather Blair
455 Capitol Mall, Suite 300
Sacramento, CA 95814
Email: NSJTP@ascent.inc.

RE: Northern San Joaquin 230 kV Project, Application Number: A.23-09-001

Mr. Sanchez,

I am writing this letter regarding concerns with respect to the above referenced project. This is submitted via mail and email on 2/5/24.

I am deeply concerned about the environmental, safety, aesthetics and health impacts of having 230kV power lines running so close to my property and the properties of others in our area. It seems like no one has taken into account the adverse effect this project will have on farmers, residents and property owners alike. We were told the 70% of the power from this project will benefit the City of Lodi directly while those of us who reside and farm near the proposed project (and do not reside in the City of Lodi) are forced to bear the burden of the short term and long-term effects. The negative impact of this project would start at construction and continue indefinitely. If the City of Lodi needs more power, they should develop a new power source to sustain current growth and future growth within their city limits. They currently have two power plants (Lodi Energy Center 225-megawatt plant located at White Slough and a 48-megawatt plant located adjacent to Lodi Lake). They have the opportunity to be a leader in this environmental age and put alternative energy sources into play. If the City of Lodi would meet their own power needs, then there would be no need for this project. It should be the responsibility of the City of Lodi to develop 70% of the 230 kV power that this project proposes to meet their needs. If they were doing their job responsibly then the lives and livelihoods of others who won't benefit from this proposed project would not be negatively impacted.

My family has lived on this property for 45 years. It is a peaceful serene community with wonderful views. If this project goes through as proposed that will be gone forever. Section 5.1.1.1 lists the 18 representative photos that were included in the PEA. None of these were taken from my property which will be only 300' from the proposed lines to the north and within ¼ mile of proposed lines to the east. It states in Landscape Unit 2 that "residents situated by project routes sensitivity to open views in moderate to high. Would you like to see towers daily and hear the hum of power going through the lines? Property values will go down, noise levels (corona) will be evident, electronics in our home will be affected, and our health will be at risk. The EIR does not address EMFs that would be generated by this proposed project; however, I strongly believe NIH studies indicating a potential health risk should take precedence over any implied lack of information.

If this proposed 230 kV project moves ahead the CPUC, PG&E and LEU have an historic opportunity to "do the right thing", and build the project right the first time. It appears that the least cost approach has been taken. Utilize existing power corridors and right of way easements. It does not make sense to construct a brand-new power corridor through existing productive prime farmland. Section 4 Alternatives "D" (Undergrounding) meets the project purpose and most objectives. Utilize that option down Víctor Road / Highway 12. Underground transmission lines can be installed in dedicated public thoroughfares with dense populations, they preserve natural beauty and land values, have minimal impact from atmospheric conditions in our ever-changing climate crisis, and they are safely out of the way. Examples of completed projects where high voltage transmission lines were buried underground are: Jefferson-Martin 230 kV Transmission Line Project, Sycamore to Peñasquitos 230 kV Transmission Line Project, SCE Riverside

Transmission Reliability Project (230 kV), Embarcadero-Poterero 230 kV Transmission Project, and the Tehachapi Renewable Transmission Project (500 kV). Residents that live in San Joaquin County (east of the City of Lodi to Lockeford, and east of the Lockeford substation) along the proposed route deserve the same consideration. Don't disrupt 43.67 acres of "Important Farmland", farming operations and the lives of residents who did not ask for and will not benefit from this proposed project. The City of Lodi and PG&E stand to profit at the expense of our quality of life.

If undergrounding in a public thoroughfare or easement is not chosen then I advocate for 4.3 "No Project Alternative". This would be the time for the City of Lodi to go back to the drawing board to make a plan that sustains their energy needs within the city limits. Clean energy or renewable energy with a low or zero carbon footprint (wind power, solar power, geothermal, bioenergy) would be a way to create more sustainable systems. The City of Lodi needs to step up and commit to "thinking outside the box" to meet their energy demands. Take a leadership role and become a model for other public entities in our area.

I believe it is CPUC's job to protect the public. Their vision is, "The CPUC betters the lives of all Californians through our recognized leadership in innovative communications, energy, transportation and water policies and regulation". As a resident of one of the potentially affected areas, I ask that you seriously reconsider the proposed project and seek a more innovative, viable, all-around solution to increase power transmission if it is indeed required.

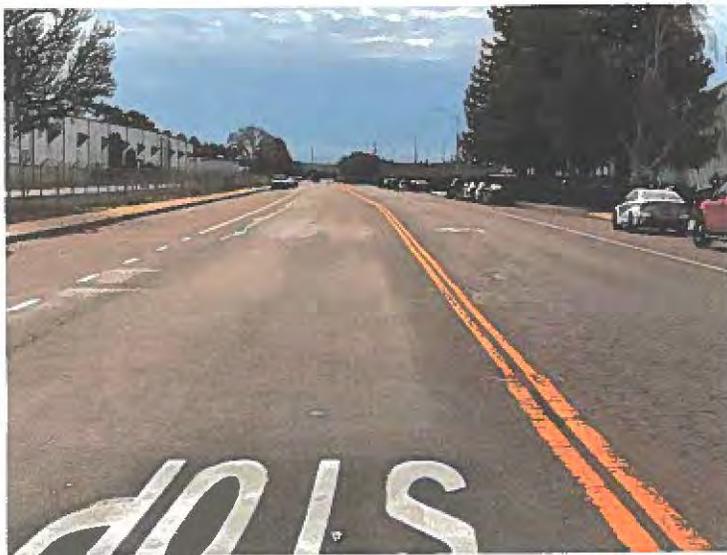
Respectfully Submitted,



Andrea Kutlik
Residence Address: 14453 N. Vintage Road, Lodi, CA 95240
Mailing Address: P.O. Box 401, Victor, CA 95253
(209)327-8222
Email: handiandi02@gmail.com



LEU Industrial Substation Facing West
(Taken from Guild Ave)
2/3/24



Guild Ave Facing South
(Taken at Victor Road / Hwy 12)
2/3/24



Victor Road / Hwy 12 Facing East
(Taken at Guild Ave)
2/3/24

The proposed 230 kV line between PG&E Lockeford Substation and LEU Industrial Substation is 6.8 miles long. Over 3 miles of this route down Victor Road / Highway 12 has an existing easement on the north side of the road. Bury the lines down this wide road if the project is actually needed.



SAN JOAQUIN FARM BUREAU FEDERATION

MEETING TODAY'S CHALLENGES / PLANNING FOR TOMORROW

February 6, 2024

Boris Sanchez, CPUC
c/o Ascent, Attn: Heather Blair
455 Capitol Mall, Suite 300

RE: PG&E Northern San Joaquin 230kV Transmission Project (A.23-09-001)

Dear Mr. Sanchez,

The San Joaquin Farm Bureau is submitting this letter with our input on the scope and content on the proposed Environmental Impact Report for the PG&E Northern San Joaquin 230kV Transmission Project. The San Joaquin Farm Bureau Federation is San Joaquin County's oldest agriculture organization, dedicated to the advancement of agriculture for over 100 years. Representing over 1,300 members throughout the county, we are committed to the protection of the natural resources that our industry depends on, including land. Protecting the prime farmland and the ability of farmers here to continue to operate in our county is our highest priority. While we have concerns with the project overall, we do have specific concerns that we would like to have addressed in the EIR.

We are concerned with the impact this project will have on our members' quality of life by restricting their ability to continue to produce on their land. As Lodi has become an area where people visit to explore their vibrant wine industry, more and more vineyard owners are moving away from bulk wine production and into inviting the public onto their properties to taste locally grown wines. Many of these landowners operate small farms that are already operating at a disadvantage to larger operations but are tailor made to tap into the public's interest in locally grown products. This project will impact the landowner's ability to pursue agrotourism on their properties, limiting their ability to attract visitors to tasting rooms. The project will also impact the landowner's ability to transition the tree fruit and nut crops that are grown elsewhere in the county as it is unsafe to farm these crops below the wires.

These lines will be added to a landscape already criss-crossed with existing power infrastructure. These lines will further restrict landowners' ability to use aerial applications on their property. These applications are a quick, safe, and cost-effective way to apply treatments to a large area. Limiting their access to these applications will require landowners and employees to apply products themselves in a much less efficient manner resulting in lost revenue and removing their ability to quickly react to developments in their vineyards and fields.

Placement of the new line must also be carefully evaluated. The proposed line runs near, and in some cases over top of, existing water pumps and infrastructure for many of our members. Having these lines in close proximity may force the landowners to abandon their wells and relocate them

elsewhere on their property at great expense. Underground water infrastructure, such as irrigation pipes and lines need to also be avoided when choosing sites for the towers themselves.

These impacts could potentially be mitigated through a few different measures. Adding capacity to existing infrastructure, such as the Lockeford-Industrial 60kV line or one of the other 60kV or 115kV lines, instead of building new towers and adding a new corridor is one option that should be explored. There is also an abandoned rail line right of way that may be used to limit the impact on landowners. The option of undergrounding the project where possible along existing transportation corridors is another potential avenue that would allow for the project while minimizing the impact to landowners along the route. The route should also follow existing property lines and right of ways where possible and avoid bisecting properties, whether above or below ground.

Thank you for your attention to our concerns and we look forward to seeing them addressed in the upcoming Environmental Impact Report. If you have any questions, please feel free to contact me at any time.



Andrew Genasci
Executive Director, San Joaquin Farm Bureau
andrew@sjfb.org
209-670-4390

From: [Sanchez, Boris](#)
To: [NSJTP](#)
Cc: [Heather Blair](#)
Subject: FW: [EXTERNAL] EIR
Date: Tuesday, January 30, 2024 3:44:59 PM
Attachments: [Northern San Joaquin Project Overview Map.jpg](#)
[15467 E Kettelman Lane Vineyard Proposed PGE ROW.pdf](#)
[PGE Proposed ROW Issues.pdf](#)
[15601 E Kettelman Lane \(83\)-D-Size.pdf](#)
[15467 E Kettelman Lane Vineyard Proposed PGE ROW.pdf](#)
Importance: High

Dwight's information sent over last week.

From: dwightb <dwightb@miovigneto.com>
Sent: Thursday, January 18, 2024 10:24 AM
To: Sanchez, Boris <Boris.Sanchez@cpuc.ca.gov>
Cc: 'Karen Mills' <Kmills@CFBF.com>
Subject: RE: [EXTERNAL] EIR
Importance: High

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning,

Attached are some maps I drafted of how the new ROW will impact my property along with a Letter I drafted a while back for the PG&E meeting held in Lodi.

Please review, for I believe it will be helpful in you decision.

Looking at the attached map that you sent me, our property is located exactly were the descriptor shows "Rio-Oso-Lockeford 230kv and Lockeford-Bellota 230kv." Now looking at the attached drawing entitled, "15467 E. Kettleman Lane Vineyard Proposed PGE ROW" you will see how adding a separate 100 foot wide easement and tower placement will affect my property severely. Getting estimates from various persons that have developed wells in the past year, we are looking at almost \$200,000 plus all the infrastructure that has to be modified.

I don't see the benefits of running a separate line from a single main feed line. Wouldn't be better to just double the conductors on the existing line like will be done on the Brighton-Bellota 230kv main line using the Lockeford substation as a distribution point.

Another option is to run down Brandt Road. It is more open, less developed and a shorter distance to the substation in Lodi proper. The farms along Kettleman lane, like mine are starting to develop more wine-tourist industry due to its proximity to established winery's and Lodi proper.

As mentioned before, the route currently chosen will cause financial harm to these parcels as the owners transition due to loss of grape contracts to boutique wineries, thus driving up the tourist

economy in Lodi.

Please forward this to all that will review the proposed route. There has to be a better solution.

Best Regards,

Dwight Busalacchi

Dwight & Sharon Busalacchi

Vineyard and Winery:

15467 E. Kettleman Lane
Lodi, CA 95240

Residence:

8075 Wayland Rd.
Loomis, CA 95650
Cell: 415 531-6450

Our property at 15467 E. Kettleman Lane, Lodi, California is noted as Parcel 16 of the Lockeford-Lodi Farms Subdivision, Unit 1. This subdivision is made up of 10 to 40 acre parcels, see "Exhibit B."

As shown on Exhibit B, the proposed new 230kv transmission line will cause severe property value loss to the most North Westerly parcel as shown on said map. With the current building offset requirements up to 175 feet along with the added 100 foot wide easement make it impossible to develop as a home site and vineyard as being done on several parcels in Lodi.

All the blocks of the Lockeford-Lodi Farm Subdivision have been noted on the San Joaquin GIS data server as a "Special Soils Area."

Our Property

Looking at Exhibit B, you can see how we planted our vineyard. This was to take advantage of the different soil types on our farm. Because of the soils on the northern end of our parcel, we planted small blocks of both Bordeaux and Italian wine grapes. The usual block size is one to two acres. Besides taking advantage of the soil types, the production of around 4-5 tons per acre was perfect for our business plan to share these unique grapes with our customers while being able to produce the needs of our winery and tasting room currently in construction.

As with our neighbors parcel to the West, the proposed easement would also prevent us from building our home with access to Smith Road.

The proposed pole location will remove 24% of our Nero d'Avola and 16% of our very rare Cabernet Sauvignon grapes out of production. Looking at this year's price per ton, we would have lost \$6,000 if this project was in place. Currently we receive anywhere from 5 to 6 times the average price for our Lodi districts grapes. Based on our 2023 harvest income, this potential loss represents about 13% of our grape income.

The reason our Cabernet grapes are so rare, is that UC Davis pulled this clone out of their nursery several years ago due to its susceptibility to viruses. Most vineyards having this clone, have pulled it out due to rapid loss of quality and production. What is unique about our Cabernet, is that it has the fatal virus but shows no decline at all. The question is, is "are our grape vines holding the DNA that will make all grape vines in the future be disease resistant?"

Looking at Exhibit A

As you can see on the attached Exhibit A, the proposed new ROW will cause the following issues.

1) The existing 440 foot deep AG and Domestic water well is now only 21.2 feet away from the 230kv conductors. This will require the well to be abandoned and a new well to be drilled. Our current well has been tested at the time of development, tested at 700gpm.

(Estimated cost for a new well, \$160,000). That does not include the abandonment of the existing well.

Please also note that the proposed conductors will impact my neighbors well located adjacent to Jory Road. Using Goggle Earth, I measure about 32 feet distance.

2) The Irrigation Control Building were all my internet, irrigation controller and wireless communication to remote sensors in the field will need to be moved to the new well location due to interference from being close to the proposed lines.

3) All the main and submain irrigation lines, irrigation valve control circuits along with the domestic water storage tank will have to be relocated to the new well site.

4) The existing power pole with stepdown transformer is too close to the 230kv lines and will have to be moved.

5) Our electrical distribution system has to move to the new well location. This will be very costly due to the need to re-route existing double 4" PVC conduits containing 500mcm conductors in a direct line from the winery to the distribution panels.

6) We would need new blocks to be planted to meet our existing production requirements to fulfill our customers' needs and our model for wine production at our new winery.

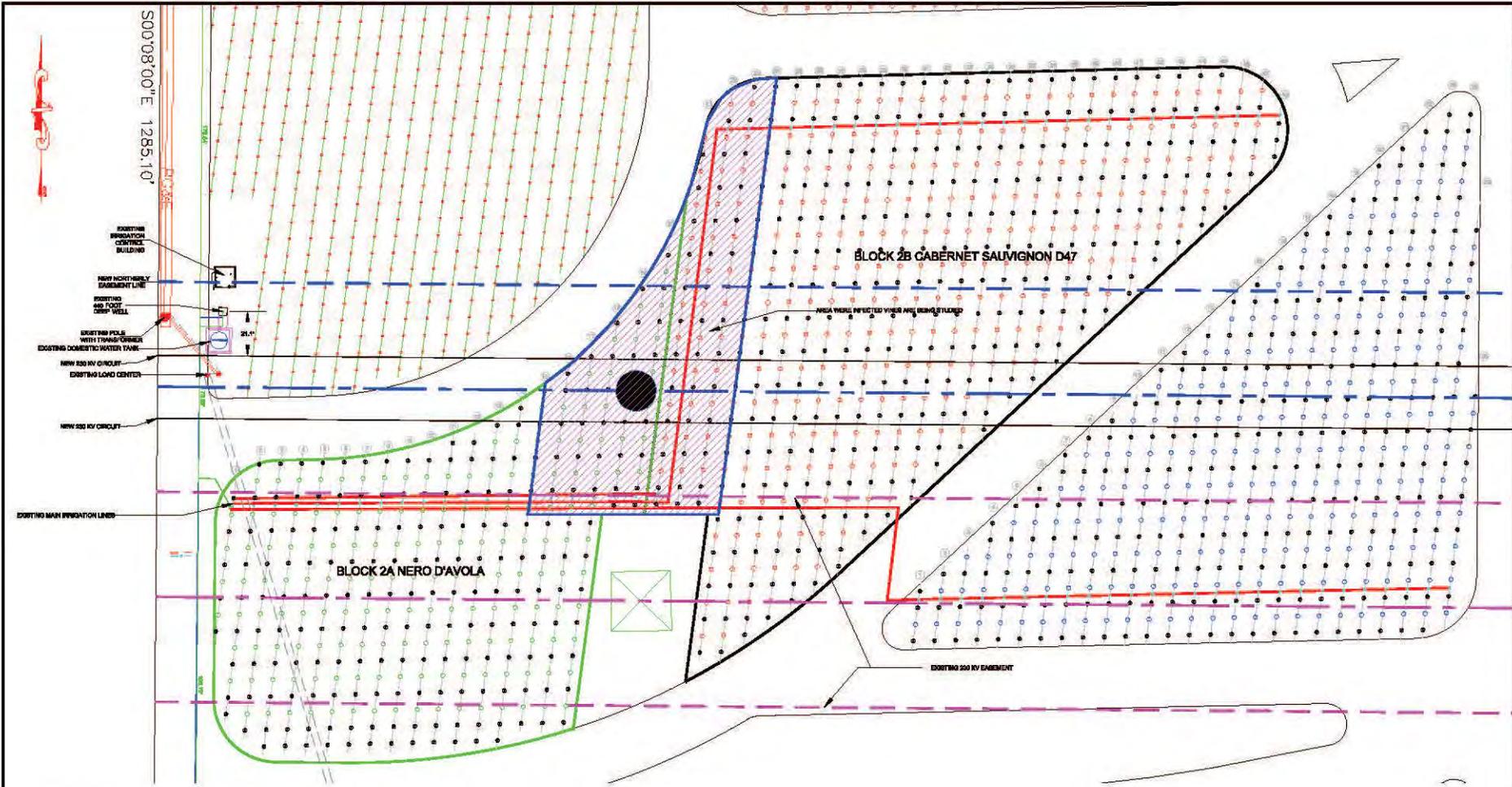
If you look at the current PG&E routing map, you will notice that the main line tying in from the South shows double dots along the transmission line path to the intersection of the current line heading west to the Lockeford sub-station. The drawing does not show this in the drawing notes, but as a Land Surveyor that worked for a Public Utility, means to me as the conductors are being doubled per phase.

Since the main transmission line that PG&E is tying into is a two circuit single conductor per phase line and that the Lockeford substation looks like it has a common bus feeding all the switches along with transformers, can't PG&E double the existing conductors on the existing towers? Current is current. His would have very little impact to all parcels under said ROW.

In closing, using the current proposed route through these small parcels will have a much greater environmental and economic impact to the owners of said parcels than using either the Northern or Southern route which go through large tracks of land.

Regards,

Dwight J. & Sharon A. Busalacchi



LEGEND:

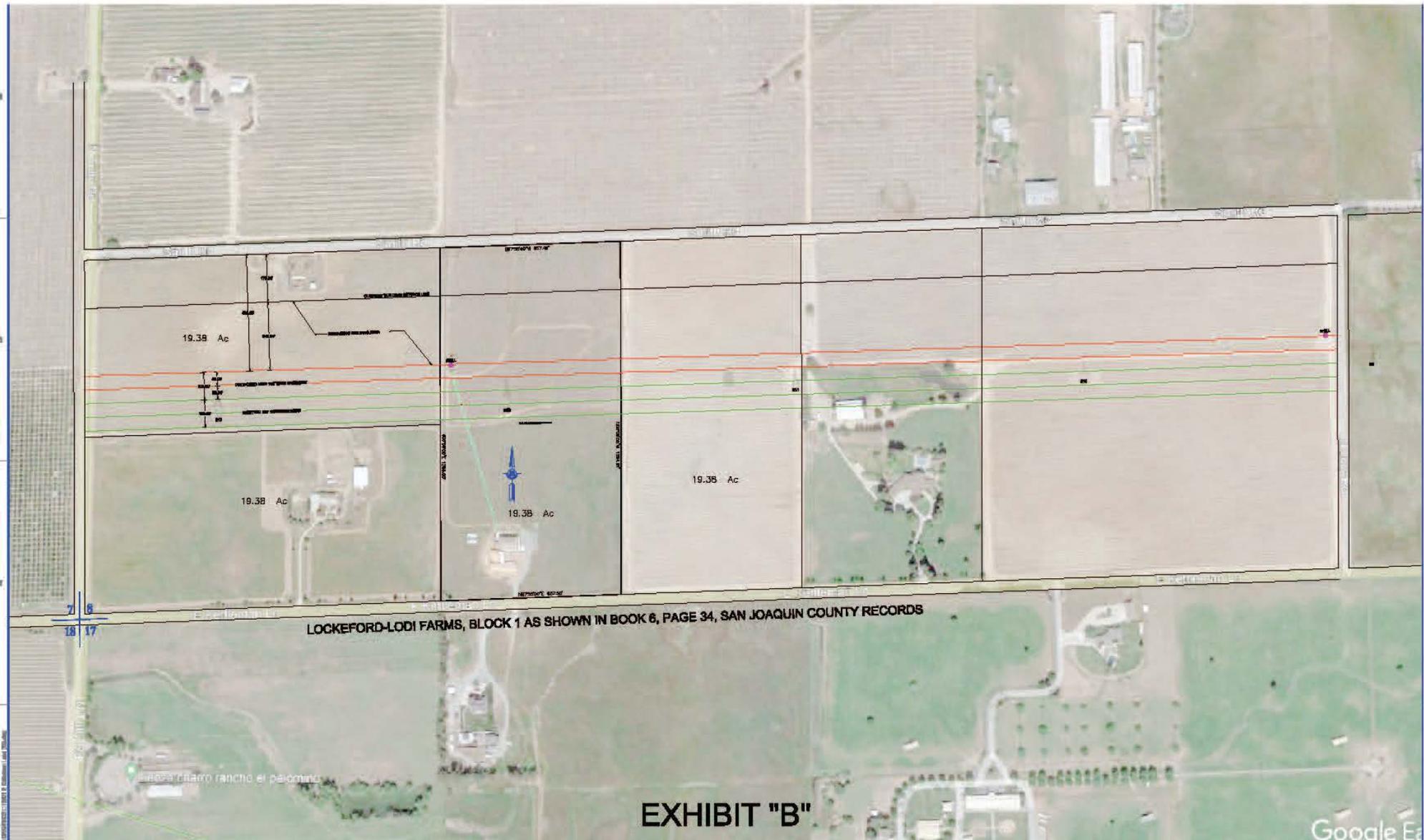
-  PROPOSED NEW TOWER
-  AREA TO BE AFFECTED BY NEW CONSTRUCTION

Exhibit A

SHOWING THE NORTHERLY PORTION OF LOT 18 OF LOCKEFORD-LODI FARMS, BLOCK 1 AS SHOWN IN BOOK 6, PAGE 34, SAN JOAQUIN COUNTY RECORDS

NO.	DATE				APPR.	REFERENCE INFORMATION AND NOTES				
	DESIGN	DRAWN	CHECKED	DATE		DESIGN	DRAWN	CHECKED	DATE	
<p style="text-align: center;">Vineyard 15467 E. Keneshaw Road Lodi, CA For Mr. & Mrs. Dwight J. Raschinski 8075 Weyland Rd. Lodi, CA 95669 Mobile (415) 531-4968</p>										
<p style="text-align: center;">SHEET 1 OF 1 HTS DATE: 11/25/2023</p>										





LOCKEFORD-LODI FARMS, BLOCK 1 AS SHOWN IN BOOK 6, PAGE 34, SAN JOAQUIN COUNTY RECORDS

EXHIBIT "B"

Google Earth

REV	DESCRIPTION	DATE	APPR.



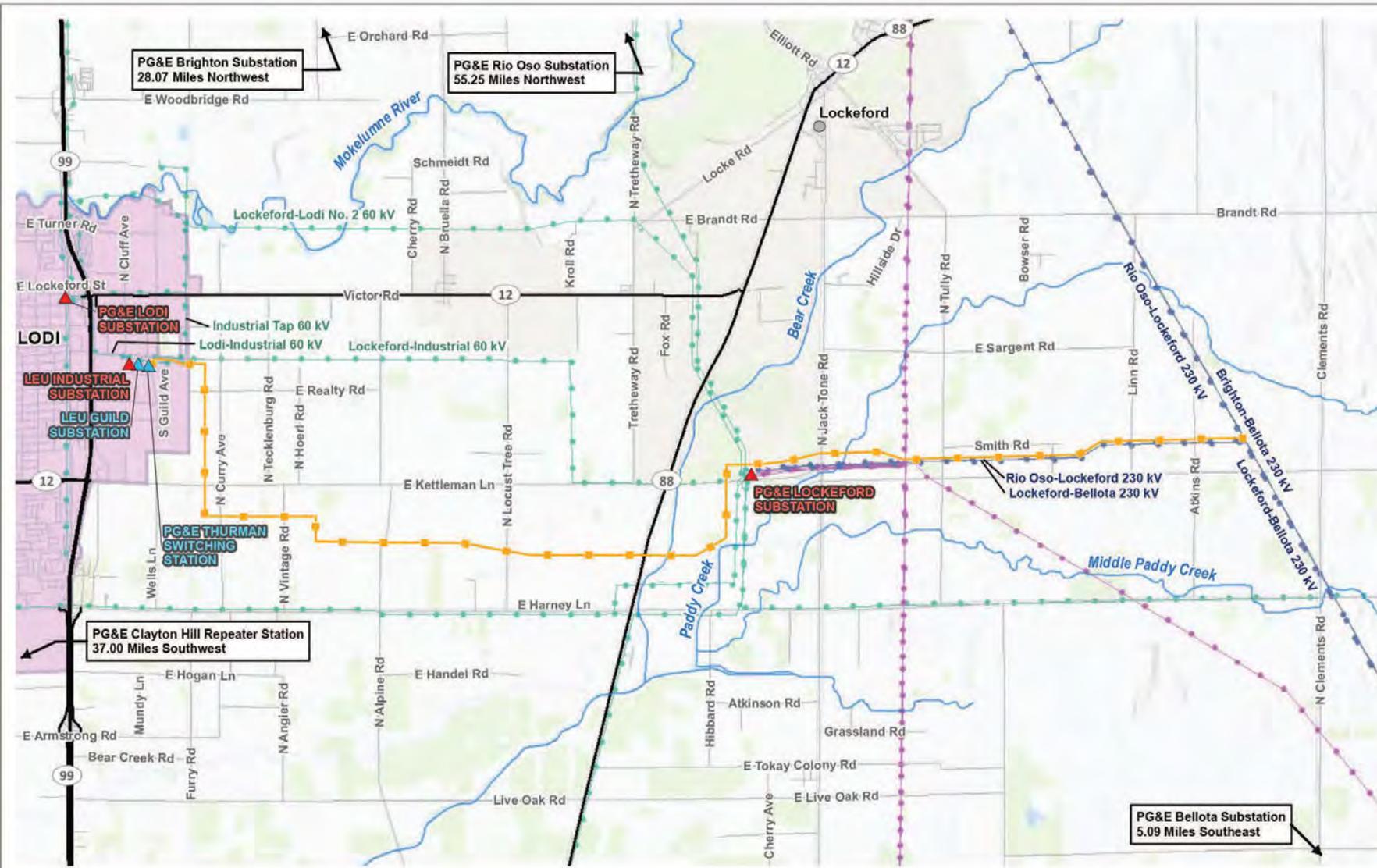
DATE		
DESIGN		
DRAWN	MAPPING CERTIFICATION	ENGINEERING CERTIFICATION
CHECKED	Surveyor	Engineer
	L.A. NO.	R.C.E. NO.

VERIFY SCALES
0 4"

SCALE
1
SHEET OF SHEET

VERIFY SCALE BY
MEASURING
THE SCALE OF
THIS SHEET, AGAINST
ANOTHER ACCURATELY

A B C D E F G H



- Legend**
- ▲ Existing Substation
 - ▲ New Substation/ Switching Station
 - PG&E New 230 kV Transmission Line
- Existing PG&E Power and Transmission Lines**
- - - 60
 - - - 115
 - - - 230
- Major_Roads
 - Local Road
 - River/Stream
 - City Boundary



From: [dwightb](#)
To: [NSJTP](#)
Cc: "[Karen Mills](#)"; "[Amy Blagg](#)"
Subject: CPCN Application No. A2309001
Date: Tuesday, January 30, 2024 11:04:11 AM
Attachments: [PGE ROW Options.pdf](#)
[15467 E Kettelman Lane Vineyard Proposed PGE ROW.pdf](#)
[15601 E Kettelman Lane \(83\)-D-Size.pdf](#)
[PGE Proposed ROW Issues.pdf](#)

Dear Ms. Blair,

My Wife and I own the 20 acre parcel located on 15467 E. Kettleman Lane, Lodi Calif, 95240. We are a small lot grape grower serving premium wineries throughout California. The proposed project will have a severer consequences to our living and property value.

Please forward the attached document to the committee for review.

Attachments:

PGE ROW Options.pdf (Alternative routing ideas)
15467 E. Kettleman Lane Vineyard Proposed PGE ROW.pdf, (Topographical map of how the new easement will affect my property)
15601 E. Kettleman Lane (83)-D-Size.pdf, (Shows all the proposed ROW will affect the adjoining parcel to the west)
PGE Proposed ROW Issues.pdf, (Letter explaining how the proposed ROW will affect PGE and us.)

Best Regards,

Dwight J. Basalacchi

Phone:(415) 531-6450

Email: dwightb@miovigneto.com

Dwight & Sharon Busalacchi

Vineyard and Winery:

15467 E. Kettleman Lane
Lodi, CA 95240

Residence:

8075 Wayland Rd.
Loomis, CA 95650
Cell: 415 531-6450

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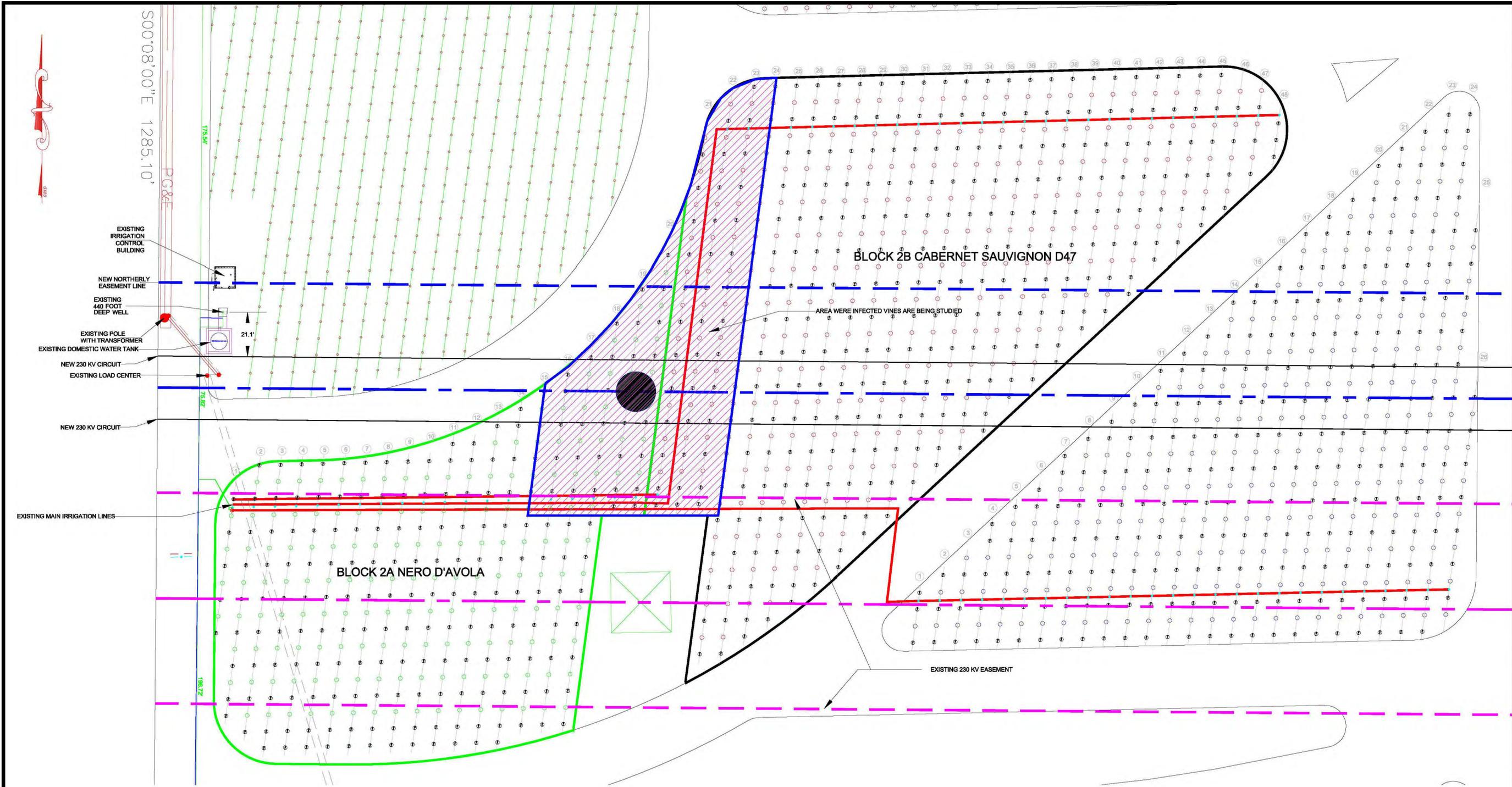
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Regards,

Dwight J. & Sharon A. Busalacchi



LEGAND:

-  PROPOSED NEW TOWER
-  AREA TO BE AFFECTED BY NEW CONSTRUCTION

Exhibit A

SHOWING THE NORTHERLY PORTION OF LOT 16 OF LOCKEFORD-LODI FARMS, BLOCK 1 AS SHOWN IN BOOK 6, PAGE 34, SAN JOAQUIN COUNTY RECORDS

SHEET		1	
15467 E. Kettleman Road Lodi, CA		1 OF 1	
For		NTS	
Mr. & Mrs Dwight J. Busalacchi		DATE: 11/25/2023	
8075 Wayland Rd. Loomis, CA 95650			
Mobile (415) 531-6450			
			
DATE	DESIGN	DRAWN	CHECKED
NO. REVISIONS			
APPR. REFERENCE INFORMATION AND NOTES			



LOCKEFORD-LODI FARMS, BLOCK 1 AS SHOWN IN BOOK 6, PAGE 34, SAN JOAQUIN COUNTY RECORDS

EXHIBIT "B"

REV	DESCRIPTION	DATE	APPR



DATE	DESIGN	ENGINEERING CERTIFICATION

VERIFY SCALES

0 1"

VER. SCALE 2
ORIGINAL DRAWING
VER. SCALE 3
THIS SHEET, ADJUST
SCALES ACCORDINGLY

SCALE
SHEET
1
SHEET_OF_SHEET

S:\DWG\C:\Land Projects\3\LODI\DRAWINGS\18001_E Kettleman Lane (8).dwg

PG&E ROW Options

1) The City of Lodi receives 70% of the new capacity, the rest to Northern San Joaquin County.

OPTION 1:

There are two main transmission Lines running north and South. The first set of transmission lines runs along Hwy 5 from Stockton northward and crosses Hwy 5 at the intersection of Grant line road and Hwy 5. It than crosses the railroad right of way that runs northbound from Lodi.

What makes this route more beneficial as a power source for Lodi is:

This set of transmission lines tie into the Stockton co-generation plant just North of City of Stockton and runs along Hwy 5. Thus tapping into the transmission line at the junction of where it crosses the railroad ROW than running south along said ROW which runs East of Hwy 99 will keep the transmission line away from crossing small farms to a location adjacent to the two substations that are shown as the terminus of the proposed 230kv line running through small farms and homes. PG&E can then use the existing 69kv lines to tie Lockeford substation to the other two in the city limits of Lodi if necessary.

The above route will provide better source of power than the very long Brighton – Bellota transmission line which has the same ampacity as the existing line that ties in the Lockeford substation. **Route Length 17 miles**

OPTION 2:

Option 2, is a less invasive then the current proposal, but can be made a little more potable by doing some modifications to the current design.

If you take a ride down Kettleman Lane toward Clements Road until you see the 230kv transmission line traverse Kettleman Lane. If you look to the North along that transmission line you will notice two massive towers that tap the main line in a vineyard. If they go ahead with running separate towers they will have to install two more massive towers in that vineyard. You can also see them using Google Earth.

If you look at the PG&E “Project Location Overview” map supplied in the Zoom meeting announcement letter, and follow the Brighton-Bellota line from the lower right corner going northward to the intersection of the existing line going to the Lockeford substation. You will notice that line has what seems to be double blue dots. Thence going northward only single dots as shown on their legend as “Existing 230kv” transmission line. Currently the whole line is just a single conductor line. They don’t show a new set of towers, but I think the plan is to

double the conductors on that line. If so, then why do they need a new set of 230kv towers from the main line to the Lockeford station?

My proposed option is double the conductors as I think they plan to do on the main line, from the main line to the Lockeford substation. Than from that station to the new station and existing substations converting the 69kv lines to 110kv lines, they can use the same poles and if necessary double the conductors to give them the same kilowatts as a single 230kv conductor. This would be more pleasing to the eyes.

In closing, the current proposed new 230kv line, excluding the modifications to the Brighton-Bellota line would be **9 miles**

OPTION 3:

Option 3 is a direct line between the main transmission line running along Hwy 5 and the substation. It is around 7 miles. They would need to jog around a little.

Best Regards,

Dwight Busalacchi

(415) 531-6450

From: cstarr@croptionsolutions.farm
To: [NSJTP](#)
Subject: PG&E Norther San Joaquin 230KV Transmission Project
Date: Thursday, February 8, 2024 7:58:27 AM

Dear CPUC,

I am writing to express my concerns regarding the proposed installation of new power transmission lines in the Lodi/Lockeford area, particularly in the context of the area's burgeoning reputation as an agrotourism destination. As a member of the community, I am deeply invested in preserving the aesthetic beauty and unique character of our region while also fostering economic development and tourism opportunities.

It is my understanding that the proposed power transmission lines would span approximately 11 miles through our area. While I acknowledge the necessity of such infrastructure projects, I believe it is crucial to consider alternatives that minimize the visual impact on our landscape and contribute positively to our community's goals.

One alternative that I would like to propose is the consideration of underground power lines. By burying the transmission lines underground, we can preserve the scenic beauty of our surroundings and maintain the integrity of our agrotourism efforts. Additionally, the space above ground could be repurposed as public bike and path trails, further enhancing our community's recreational offerings and attracting tourists.

Investing in underground power lines and transforming the surface area into public trails aligns with our community's values of sustainability, environmental stewardship, and economic vitality. Not only would this alternative mitigate the visual blight of overhead power lines, but it would also create new opportunities for outdoor recreation and enjoyment for residents and visitors alike.

I urge Pacific Gas and Electric Company to carefully consider the esthetic and long-term impacts of the proposed power transmission lines on our community. I believe that by exploring alternatives such as underground installation and repurposing the surface area for public trails, we can achieve a win-win solution that benefits both the utility's needs and the well-being of our community.

Thank you for considering my input on this matter.

Sincerely,
Charles Starr IV

From: [Chris Machado](#)
To: [NSJTP](#)
Subject: North San Joaquin 240 KV Transmission Project
Date: Thursday, February 8, 2024 10:16:26 AM

Dear Sirs, my name is Chris Machado, I own a 140 acre Vineyard at 17800 East Kettleman Ln. Lodi. Currently I have one high transmission tower located in the middle of my Vineyard and this project proposes to add a second tower 100 feet to the north of this existing tower taking vineyard land out of production along with the access road to build the proposed tower. I am an extreme opposition to this project as is being proposed. Number one why couldn't the current outdated old tower be replaced with a newer tower and heavier wire to transmit the additional needed electricity rather than taking more land from landowners to build the new proposed line. Second an even better proposal would be if PG&E needs more power for the Lockeford area and Lodi needs more power than why do they not purchase a piece of property next to the Lockeford substation on Kettleman Lane and Install a large solar generation farm there and produce their own power on site rather than transmitting it from the north south Bellota line over to the Lockeford substation?? This proposal would not affect all the landowners in their current proposed project and it would be safe clean solar energy for the future and also add to PG&E's E.S.G. corporate profile. The Lodi substation could do the same also to meet its growing electrical needs. When PG&E held their community informational meeting at the Lodi Grape festival grounds on November 29th, the PG@E employees presenting the meeting could not answer any of these questions. They did not have an engineer on hand, they did not explain the need for more power nor could they answer how landowners would be compensated. They did a terrible job explaining the need for this new power line which turned all the participants against them. The presenters answer to most questions was: this is what we're doing and if you don't like it write to the CPUC. Please respond that you have received my opposition letter to this project and that you will consider the above alternatives to building this new power line, thank you. Sincerely, Chris Machado

February 9, 2024

Boris Sanchez, CPUC
c/o Ascent, Attn: Heather Blair
455 Capitol Mall, Suite 300
Sacramento, CA 95814
Email: NSJTP@ascent.inc.

Re: Northern San Joaquin 230 kV Project, Application Number: A.23-09-001

Dear Mr. Sanchez:

I am writing in regards to the Notice of Preparation of Draft EIR for the proposed Northern San Joaquin 230 kV Project, Application Number: A.23-09-001 (the “Project”). Our office represents Mr. Robert Batch, who is the owner of Assessor’s Parcel No 061-133-060-000 located at 14384 N Vintage Rd Lodi, which is likely to be significantly impacted from the Project.

We have reviewed the Proponent’s Environmental Assessment for Pacific Gas and Electric Company’s Northern San Joaquin 230 kV Transmission Project and have prepared the following comments regarding the scoping of the proposed Project that are being submitted on behalf of our client. Going forward, we would request special notice of all environmental and public participation hearings, if any, of the remaining aspects of the general proceedings to ensure that our client is provided with the fair opportunity to participate in CPUC’s evaluation processes or provide perspectives on the project alternatives.

Overall, we do not believe that PG&E can satisfy its duty in evaluating the impacts caused by the proposed Project or those of General Order 131-D, based on Public Utilities Code §1001, which generally requires the CPUC to certify that the “public convenience and necessity” requires such construction. Here, my client maintains that PG&E cannot reasonably justify its chosen alternative because it has not fully and fairly evaluated the impacts of the Project and that there are less impactful means of achieving the Project’s objectives.

A. CPUC’s Mandates and Statutory Duties.

As you know, the CPUC evaluates applications by using an environmental evaluation and general proceeding. In the environmental evaluation, CPUC has an independent obligation and responsibility to properly evaluate all of the potential impacts caused by a project to the

Boris Sanchez, CPUC

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surrounding environment and communities. This is done in accordance with both the California Environmental Quality Act (CEQA) and with its own environmental rules, which includes evaluations of environmental issues such as water and air quality, noise, land uses, agricultural, biological, and cultural resources, mineral resources, public services, recreation, population, housing, transportation and aesthetics.

At the same time, CPUC is charged with ensuring that public utilities “furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.” (Public Utilities Code § 451.) Thus, no electrical corporation may begin construction or extension of lines “without having first obtained from the commission a certificate that the present or future public convenience and necessity require or will require such construction.” (Public Utilities Code § 1001.) In granting the CPCN pursuant to section 1001, the Commission “shall give consideration to the following factors:

“(1) Community values.

“(2) Recreational and park areas.

“(3) Historical and aesthetic values.

“(4) Influence on environment....”

(Public Utilities Code § 1002.)

In addition, when considering an application for an electric transmission facility, “the commission **shall** consider cost-effective alternatives to transmission facilities that meet the need for an efficient, reliable, and affordable supply of electricity, including, but not limited to, demand-side alternatives such as targeted energy efficiency, ultraclean distributed generation, as defined in Section 353.2, and other demand reduction resources.” (Public Utilities Code § 1002.3 (Emphasis added).) The electric corporation's application for a CPCN “**shall** include ... [a] cost analysis comparing the project with any feasible alternative sources of power. The corporation shall demonstrate the financial impact of the plant, line, or extension construction on the corporation's ratepayers, stockholders, and on the cost of the corporation's borrowed capital.” (Public Utilities Code § 1003, subd. (d)(Emphasis added).)

The CPUC’s general proceeding, as a formal review process, considers how projects could potentially benefit or harm the public, including its potential effects on utility ratepayers and seeks to strike a balance among power production, land use, and environmental stewardship.

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Commission's Rules of Practice and Procedure, section 14.3, governing written comments made by the parties on proposed or alternate decisions reads in part: “Comments shall focus on factual, legal or technical errors in the proposed or alternative decision and in citing such errors shall make specific references to the record or applicable law.” (Cal.Code Regs., tit. 20, § 14.3, subd. (c), italics added.)

With this in mind the following comments concerning siting, alternatives, environmental impacts and concerns are submitted with the argument that they must be fully investigated and fairly evaluated as part of the anticipated Draft EIR. (CEQA, Section 15082 (b).)

B. Failure To Provide Adequate Notice.

As an initial matter, it should be noted that my client was not provided with notice of the pending Project or CPUC’s evaluation processes, despite being directly impacted by one of the Project alternatives. The PG&E PEA states that “Pre-filing consultation and public outreach has occurred with CAISO, California Public Utilities Commission (CPUC), public agencies with jurisdiction over the project area, Native American tribes affiliated with the project area, other utility owners and operators, and the local community and public.” (Proponent’s Environmental Assessment (“PEA”) at § 2.2.)

Inexplicably, my client’s property, Assessor’s Parcel No 061-133-060-000, is located adjacent to the proposed preferred alternative and in fact the Project documents appear to show a pulling station that would be placed right in the middle of his cherry orchard requiring the removal of a number of his cherry trees, yet his APN is not listed on Appendix 1A of the List of Parcels Within 300 Feet of the Project. This raises serious questions about the adequacy of the notice that has been given not only to my client but to other surrounding land owners.

Public participation and the fair opportunity to provide comments to a Project of this nature that would have direct impacts on a landowner’s property is fundamental to ensuring a fair process and just decision.

C. The PEA’s Aesthetics Evaluation is Insufficient Given the Unique Nature of the Surrounding Properties Impacted by the Proposed Location of the Project.

The PEA’s methodology for evaluating aesthetic impacts is a visual analysis, based in part on guidance from the Federal Highway Administration and CEQA Guidelines. Notably, CEQA does not exempt aesthetic evaluations where there are potentially significant aesthetic effects on an official state scenic highway or on historical or cultural resources. (Public Resources Code §21081.3(b).) Nor does it alter, affect, or otherwise change the authority of a lead agency to consider aesthetic issues and to require the mitigation or avoidance of adverse aesthetic effect pursuant to other laws. (Public Resources Code §21081.3(c).) CEQA regulations specifically

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include aesthetics in the definition of “environment” under CEQA. (See, CEQA Guidelines at §15360.)

The PEA’s discussion on aesthetics generally recognizes the Project is “situated at the north end of Central California’s San Joaquin Valley, bordered by the Sierra Nevada foothills on the east and the inner Central Coast Range on the west. Located in San Joaquin County near the confluence of the Sacramento River to the north and the San Joaquin River to the south that drain the western flank of the Sierra Nevada mountains, the regional landscape includes a complex network of water conveyance and flood control infrastructure, as well as large riparian areas that connect the San Joaquin Valley with the San Francisco Bay to the west.” (PEA at §5.1.1.1.) Further noting that at least two roads are close to the new 230 kV double-circuit line, including Clements Road, and North Jack Tone Road, as County-designated scenic routes. (*Id.*) Yet the analysis thereafter goes on to downplay the visual impacts from developing additional 230kV double-circuit lines by stating that “[b]ecause of the predominantly flat terrain and prevailing poor visibility, scenic resources in the project area generally are limited to near- and medium-range viewpoints available within public recreation areas within the City of Lodi and from several public roadways. The foothills of the Sierra Nevada mountains begin to rise approximately 6 to 8 miles east of the project connection with the PG&E Brighton-Bellota 230 kV transmission corridor and occasionally they can be seen from some locations within the project vicinity during winter months; however, views of the mountains are largely obscured by atmospheric haze that persists in the area throughout much of the year.” (PEA at §5.1.1.2.)

Similarly, in the “Viewshed Analysis”, while acknowledging that project structures could be visible from most of the surrounding area because of the relatively flat terrain in the project area, the PEA downplays that impact by suggesting that “intervening structures, consisting mainly of rural and suburban residences and farm utility buildings, typically are surrounded by stands of tall trees, which – along with the preponderance of orchards and vineyards in many locations – constrains distant views across the landscape. Additionally, the presence of persistent temperature inversions, which prevents the dispersion of atmospheric pollutants within the valley environment, results in generally poor visibility within the project area for much of the year and, for the most part, this limits visual details to short-range perspectives.” (PEA at §5.1.1.3.) As a result, “the primary focus of the visual analysis included in this PEA is the foreground viewshed zone, where project-related visual effects would be most apparent, particularly those areas within 0.5 mile of project elements.” (*Id.*)

The PEA admits that “[t]hroughout the project area, the visual modifications to the landscape resulting from PG&E project construction would be experienced by motorists, residents, and visitors to area wineries and would be seen within the context of a working landscape with considerable modification related to agricultural activity, and where irrigation infrastructure along with agricultural processing, storage, and transport facilities are established visible landscape features.” (PEA at p.5.1-16.) By attempting to reduce the viewshed analysis due to sporadic

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pollution and haze, and surrounding landscape, much of which will be removed from the areas surrounding the project, this is highly disingenuous and biased analysis of visual impacts from the Project and is not consistent with the type of adequate analysis one would expect in a CEQA type of document.

The inadequacy of the analysis is only heightened by the recognition that this area is well known for its wineries and agriculture. (PEA at §5.1.1.5.) Building a large electrical transmission line right in the middle of this type of landscape is certain to reduce the visual aesthetic and character of the surrounding properties and those who travel to this area to go wine tasting. In fact, the PEA notes that “[t]hree wineries are situated within 0.5 mile of the project corridor and visitors may see portions of the new PG&E transmission line from some outdoor locations at winery tasting rooms.” Preserving visual aesthetics in an area known for wine tasting and surrounding agriculture should be a high priority and mitigating those impacts using alternatives, like burying electrical lines, even though more expensive, should still be considered as feasible alternatives under these circumstances. Yet the underground alternative was rejected because of the costs. The conclusion that the visual impacts are less than significant are not supported by substantial evidence under these circumstances and should be re-evaluated along with the alternatives to bury portions of the lines to mitigate those impacts.

D. The Project’s Impacts to Agricultural Resources are Inadequately Addressed in the PEA.

The PEA’s discussion of the Project’s impacts on agricultural resources is insufficient. The PEA recognizes that “San Joaquin County is in the center of California’s vast agricultural heartland, commonly known as the Central Valley. San Joaquin County encompasses approximately 921,600 acres (or about 1,440 square miles) of relatively level, agriculturally productive lands. Agriculture remains the economic base of the County and is a \$6.6 billion industry that employs nearly 17% of the County’s population (San Joaquin County 2016). San Joaquin County is the top producer, statewide, of asparagus with 24,000 acres of farmland dedicated to this single crop. In recent years, the leading crop in San Joaquin County has shifted to wine grapes (San Joaquin County 2022a). The project alignment would cross through agricultural resources, including grapes, cherries, forage hay, oats, walnut, corn and oats, almonds, and other crops”. (See, PEA at §5.2.1.3.) Notably, one of those cherry orchards impacted belongs to my client who was not properly notified about the proposed impacts as noted above.

The Pea also admits that 43.67 acres of farmland will be temporarily impacted while 1.41 acres will be permanently disturbed as “[t]he proposed PG&E 230 kV transmission line footprint will permanently intersect approximately 0.44 acre of existing Prime Farmland, approximately 0.16 acre of Unique Farmland, and approximately 0.14 acre of existing Farmland of Statewide Importance.” Some of that property is Williamson Act parcels, which are designed to preserve agricultural and open space lands. (See, PEA at §5.2.1.3.)

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Notably, there is no discussion in the PEA about the impacts on the 230kV line extension on cultivation practices of local farmers, which includes cultivation practices, loss of implement turning radius from the Project impacts, limits to future crop-dusting, helicopter drying, spraying and fertilizing practices, including temporary impacts to scheduling those activities that can be done with adequate re-entry intervals.

Section 15002(g) of the CEQA Guidelines, “a significant effect on the environment is defined as a substantial adverse change in the physical conditions which exist in the area affected by the proposed project.” As stated in Section 15064(b) of the CEQA Guidelines, the significance of an activity may vary with the setting. Yet despite this definition and the noted significance of agricultural resources being impacted by the line extension, the agricultural impacts are noted to be either “Less-Than-Significant” to “No Impact”. Section (e) of table 5.2.4 specifically asks would the project “[i]nvolve other changes in the existing environment, which, due to their location or nature, could result in the conversion of farmland to nonagricultural use.” The reality of the Project is that it will have the direct effect of impacting the surrounding farms to the point where, over time, it is more likely that those agricultural uses will be pushed out by residential expansion as a result of making it more difficult to farm those parcels in the immediate areas of the Project. This includes the results from installing new tubular steel poles and conductors for approximately 11 miles where PG&E will be extending an existing 230 kV transmission line through PG&E Lockeford Substation to a new PG&E Thurman Switching Station in Lodi. The PEA’s conclusions in this regard are not supported by substantial evidence and must be re-evaluated with any substantial impacts fully mitigated.

E. Green House Gas (GHG) Impacts Must Be Adequately Addressed.

In 2006, the Legislature adopted Assembly Bill 32, which required California to reduce its greenhouse gas (GHG) emissions to 1990 levels by 2020. (Health & Saf.Code § 38550, including Historical and Statutory Notes, 41B West's Ann. Health & Saf.Code (2010 supp.) foll. § 38550, p. 13.) The Commission adopted policies and rules designed to achieve these goals in the energy sector, including the recommendation that the electricity sector achieve renewable procurement at 33 percent renewable portfolio standard (RPS) by 2020. The California Air Resources Board (CARB) was tasked with implementing those rules. The CARB 2017 Scoping Plan states that “achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development.” (p. 101.)

Greenhouse gas emissions from buildings, including indirect emissions from offsite generation of electricity, direct emissions produced onsite, and from construction with cement and steel, amounted to 21% of global GHG emissions in 2019. (IPCC Sixth Assessment Report, Climate Change 2022, WGIII, Mitigation of Climate Change, p. 9-4.)

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On December 30, 2009, the California Resources Agency adopted amendments to the CEQA guidelines to include analysis of GHG emissions in CEQA documents, deferring significance thresholds to the lead agency. The amendments became effective on March 18, 2010. Appendix G of the CEQA guidelines, defines GHG emissions as significant if a project would: (a) generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or (b) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The most recent California state policy requires the state to be net-zero by 2045. (See, AB 1279, signed into law on September 16, 2022, - requiring the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter. It also requires the state to reduce statewide GHG emission by 85% compared to 1990 level and directs CARB to work with relevant state agencies to achieve these goals.) Therefore, any chosen alternative must meet California's broader policy goals of facilitating renewable energy development and reducing GHG emissions in the energy sector. I would urge the CPUC to adopt net-zero as the GHG significance threshold for this Project, and require full fair-share mitigation. (See, *Napa Citizens for Honest Gov't v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 364.) Here, this means mitigation of all of the Project's GHG impacts.

However, the PEA notes that full mitigation is not being required. Instead, it states the following:

in several recent CEQA documents, the CPUC has elected to use an approach to determine the significance of GHG construction emissions based on guidance developed by the South Coast Air Quality Management District (SCAQMD). For construction related GHGs, SCAQMD recommends that total emissions from construction be amortized over 30 years and added to operational emissions, and then compared to the operation-based significance threshold of 10,000 metric tons CO₂e per year. The 10,000 metric tons CO₂e per year threshold was derived from emissions data from the four largest air districts in California and is based on the Executive Order S-3-05 GHG emissions reductions goal of 80% below 1990 levels by 2050, which is roughly equivalent to 90% below current levels by 2050. This emissions reduction goal goes beyond the AB 32 emissions reduction goal established for 2020. The emissions data suggest that approximately 1% of all stationary sources emit greater than 10,000 metric tons of CO₂e per year and are responsible for 90% of GHG emissions. This significance threshold represents a capture rate of 90% of all new and modified stationary source-related projects. A 90% emissions capture rate means 90% of the total emissions from all new or modified stationary source projects would be subject to analysis in an environmental impact report prepared pursuant to CEQA, including analysis of feasible alternatives and imposition of feasible mitigation measures (SCAQMD 2008).

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The PEA narrowly focuses its analysis on the construction phase of the project for 34 months and then amortizes that over 30 years. Focusing only on the construction phase of the project for GHG analysis entirely misses the broader and cumulative impacts of additional growth that will be induced from the increased electrical capacity. The PEA recognizes that “San Joaquin County has 26 power plants generating electricity, most operating on natural gas” (PEA at 5.6.1.3), yet there is no discussion about what impacts the increasing electrical supply capacity will have on GHGs from the power supplies. Methane is a relatively potent greenhouse gas (GHG). Although methane has a relatively short atmospheric lifetime of 10-12 years, when integrated over 100-years, methane is over 20 times more effective than carbon dioxide (CO₂) at trapping heat in the atmosphere. In 2012, on a CO₂ equivalency basis, methane contributed to roughly 9 percent of total greenhouse gas emissions from U.S. anthropogenic sources, roughly a quarter of which was emitted by natural gas systems¹. Therefore, if the increasing size of the transmission lines will lead to increased consumption of electricity from non-renewable sources like natural gas, those impacts should be evaluated and fairly considered as part of the project’s CEQA analysis.

Further, there is no discussion on facilitating renewables and does not require full mitigation of GHG impacts necessary to achieve the State’s broad policy goals of net zero. Renewable systems with abundant availability and zero carbon footprint are ideal for addressing and reducing GHG impacts. However, they have problems, including low energy density, instability, and unpredictability. In order to develop a robust, sustainable, and cost-effective energy system, the integration of diverse energy sources into an electric power grid has shown to have a contribution to address fossil fuel and renewable energy related concerns. There has been a considerable increase in the green energy integration with the conventional energy systems around the world. In fact, two of the alternatives proposed, but rejected, were a Battery Energy Storage Solution (“BESS”), which involved the installation of two blocks of 50-MW batteries and a new PG&E 60 kV switching substation at LEU Industrial Substation requiring no changes or additions to power or transmission lines, and reconductoring existing PG&E 60 kV lines and installing a BESS. (See, PEA at §§4.4.8 & 4.4.9.) The BESS alternative was requested to be reconsidered by CPUC. The PEA notes that both of these alternatives were rejected because they supposedly did not meet project purpose and most objectives, including mitigating thermal overloads. However the PEA also states that “[i]n 2017, CAISO evaluated the NEER – Lodi 40 MW BESS Project as an alternative and determined that it would address thermal overloads but there were other lower-cost alternatives.” Yet the potential GHG reductions of this alternative were not fairly considered despite California’s broader policy goals of facilitating renewable energy development with energy storage as one of those potentially viable options.

¹ See, *Methane Emissions from all Anthropogenic Sources in the U.S. Data source is the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2012, Environmental Protection Agency (2014).*

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F. Conclusion.

Aside from ensuring that the impacted parties have been given fair and proper notice in this case, the CPUC has the fundamental duty and responsibility ensure that the environmental impacts on the surrounding environment and the community from this Project have been fully evaluated and fairly considered. I would urge the CPUC not to simply adopt PG&E's biased and incomplete environmental analysis as part of its own CEQA review, but to address the issues raised above to fully analyze and consider the potential impacts that the proposed Project will have. As it stands, there analysis by PG&E in this regard is woefully inadequate and would not likely pass judicial scrutiny. The CPUC must further evaluate the issues identified above as part of the Draft EIR.

Sincerely,

FENNEMORE DOWLING AARON



Daniel C. Stein

DCST/dcst

Project Name: **Northern San Joaquin 230 KV Transmission Project**

CPCN Application Number: A23-09-001

FOLLOW UP COMMENTS TO 1/30/24 SCOPING MEETING

To:

Boris Sanchez, CPUC
c/o Ascent, Attn: Heather Blair
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Submitted by:

David R. and Sandra A. Simpson
14206 N Vintage Rd.
Lodi, CA 95240
209.479.0653
simpson4grapes@yahoo.com
APN 061-133-320

Comments submitted by mail and email 2-4-2024

1. Route Selection – use existing power corridors, not new corridors

The proposed route appears to miss our property (APN 061-133-320). However, the route intersects the northeast corner of our property. The route will create a “new” power corridor rather than using an existing power corridor. This “new” corridor will pass over and adjacent to orchards and vineyards.

We strongly believe routes should follow existing power corridors, major highways, paved roads, rail lines and property lines rather than going “cross country” which will impair the landowner’s ability to plant and manage orchard under power lines.

2. Need to describe impact of “construction pads”

No information has ever been presented or discussed of the disruption to normal farming practices from the construction pads or temporary areas used to build the lines. Will the construction pad proposed on my property make it impossible to farm the vineyard and result in crop loss? When will the construction pad be used and for how long?

3. Conditions have changed and re-evaluation of routes necessary

The City of Lodi built a new 48 megawatt power plant further calling into question the wisdom of building a new power corridor versus maintaining and upgrading an existing one.

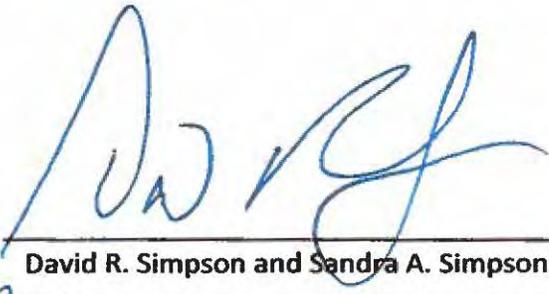
4. Re-Evaluation of construction method necessary

Why assume the transmission lines have to be overhead and not buried? We agree buried transmission lines are more expensive but that should not be the sole reason for excluding the option any more than excluding solar power because it is more costly. We recommend continuing to work with the Lodi Winegrape Commission, Lodi District Grape Growers Assoc, Visit Lodi and the Lodi Chamber of Commerce, all of which are trying to promote the rural ambiance and beauty of one of California’s premier wine grape growing regions.

5. Impact on property value

The construction of a new overhead power corridor will lower property value of surrounding properties as well as those crossed by powerlines. The visual impact of overhead power corridors is undeniable and damaging to the rural agricultural values.

Thank you for your consideration.

A large, stylized handwritten signature in blue ink, appearing to read 'David R. Simpson and Sandra A. Simpson', positioned above a horizontal line.

David R. Simpson and Sandra A. Simpson

A small, stylized handwritten signature in blue ink, possibly reading 'for', located to the left of the main signature line.

From: [KATHY PERRY](#)
To: [NSJTP](#)
Subject: Northern San Joaquin 230 KV Project Application number A.23-09-001
Date: Friday, February 9, 2024 4:17:57 PM

Boris Sanchez, CPUC
% Ascent, Attn: - Heather Blair
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Mr. Sanchez,

2/9/24

I am writing this letter not as a farmer, grower, or businessperson, but as a private individual who has lived in Lodi for 46 years and in this particular area for 35 years. I owned a 5-acre parcel here in the area where I built a home and raised my four children. My wife and I thoroughly enjoyed living there for 30 years, raising our children and caring for our grandchildren. Five years ago we sold it to our son who also loves this area and wanted to raise his own family there. Our current residence is approximately ½ mile from our previous residence and so it is still in the area adversely affected by the proposed towers and transmission lines.

In addition to the personal benefits we and all our neighbors have enjoyed, we have realized over the years just how special this part of Lodi is. There are very few vicinities, especially in the wine country, which can compare to this unique area. We are very troubled that if this project is approved it will have a severe negative and far-reaching impact on all the families here as well as this remarkable environment. We understand that there are other possible alternatives for this project, IE going underground, placing new transmission lines along the existing power line on HI way 12 (Victor Rd.), or placing them in another area less populated by families, farms, vineyards and wine related businesses. We hope the California Public Utilities Commission members will take a very thorough look at what P.G.&E. has proposed and how it will negatively impact the lives of so many as well as this wonderful environment as a whole.

Thank you so much for your time and attention to this very important matter. Please reply to confirm you received this email.

Doug and Kathy Perry
15317 N. Curry Ave.
Lodi, CA 94240
(209) 334-5529
Perryc70@comcast.net

From: [Shannon Oxford](#)
To: [NSJTP](#)
Subject: North San Joaquin 230kv Transmission Project
Date: Sunday, February 4, 2024 1:53:30 PM
Attachments: [Letter to CPUC Boris Sanchez.docx](#)
[4 back proposed area for new lines.jpg](#)
[5 view from guest house deck for proposed pole.jpg](#)
[2 front existing towers.jpg](#)
[3 front existing lines.jpg](#)
[1 project map.jpg](#)
[6 from back of main house.jpg](#)
[Request for Pubic Meetings PG&E.docx](#)
[Request for Pubic Meetings PG&E 2nd letter.docx](#)

Dear Boris Sanchez

Please Find attached our letter of response for the above mentions project. I've included the two letters that we sent back in October to PG&E and photos. I will also be sending all this information hard copy to the Ascent Address.

Sincerely,
Gayle Oxford

--

Oxford Ranch

God, Family and Purpose

Horse Boarding, Dorper Meat Sheep, Home of the DOVES Guidance Program

From: [Shannon Oxford](#)
To: [NSJTP](#)
Subject: North San Joaquin Co. 230kV Project concerns letter
Date: Monday, February 5, 2024 4:23:01 PM
Attachments: [Letter to CPUC Boris Sanchez.pdf](#)
[4 back proposed area for new lines.jpg](#)
[5 view from guest house deck for proposed pole.jpg](#)
[3 front existing lines.jpg](#)
[2 front existing towers.jpg](#)
[1 project map.jpg](#)
[6 from back of main house.jpg](#)

To: Boris Sanchez,
Please find attached our letter and photos with our comments and concerns on the NS Co
230kV proposed project.

Regards,
Gayle Oxford

--

Oxford Ranch

God, Family and Purpose

Horse Boarding, Dorper Meat Sheep, Home of the DOVES Guidance Program

Project Name: Northern San Joaquin 230kV Transmission Project

Application Number: CPCN Application No. A2309001

Comments and concerns with the proposed Northern San Joaquin 230kV Transmission Project

To: Boris Sanchez, CPUC

Submitted by:

Shannon R. and Gayle L. Oxford

Oxford Ranch and The DOVES Guidance Program School

13749 E. Kettleman Lane

Lodi, Ca. 95240

(209) 329-7034 or (209) 329-7035

ox4ranch@gmail.com

Comments and concerns submitted by mail and email 2/5/2024

It is my understanding that the CPUC exist to “ protect consumers and ensure the provision of safe, reliable utility service and infrastructure at reasonable rates, with the commitment to environmental enhancement and a healthy California economy”. To protect the public interest, safety and health in regards to utility projects. Therefore we are writing this letter of concerns about the proposed Northern San Joaquin 230kV Transmission Project which includes concerns of public and private interest, safety and health. Our hope is that CPUC will opt to do the right thing in protecting farmer’s, rancher’s and resident’s property ownership from over reaching utility companys.

- 1. Location/Aesthetics/Land use/ Health/loss of land** – All three proposed tower and line routes run parallel to our property line at the north side of our property, (see attached map and photos), 13749 E. Kettleman Lane, Lodi (We have lived on this property since 1978 and it had been in our family since 1970). The proposed lines have been indicated to be approximately 50’ from our property line to the north, which will make these lines less than 75’ to 100’ from the back door of our homes (see attached photos #s 4, 5 & 6). We already have three very large lattice towers on our property to the west of our house, (see attached photos #s 2 & 3) and three sets of lines that run across our 8.35 acres west to east. These lines are about 200’ from our front door and are visually ugly! As well, proposed lines and poles will affect our wonderful view of the farm land and Sierra Mountains that we enjoy from our windows to the north. We are also concerned for ourselves, our students, guests and livestock, about the health issues, (EMF and

Corona effects) and possible other health concerns. The additional lines and poles to the north will sandwich us in between these monstrosities. The noise from these lines is sometimes overwhelming and very irritating and also interferes with our phones and electronics. Additionally we have lost the use of about 2 to 3 acres of our land due to building restrictions under or near the existing towers and lines. The corner of Jack Tone and Kettleman Lane, which is the intersection near us, already has too many towers and lines. It is ugly and hazardous. **Why not go underground or use the existing Lattice Towers?**

2. **Impact during construction, after and ongoing** - It has also come to our attention that our private driveway is being targeted as an access and easement road during construction of this proposed project. We have not been contacted personally to get permission for this, and we will not give permission for use in the project, for many reasons; loss of privacy, dust, damage to road, trees, fences and noise to mention a few. The potential negative impact of ongoing and future maintenance will impact us personally, our students, livestock and guest not to mention financially.
3. **Benefits?** - We see no benefits for us personally or the properties owners along the proposed routes, this project is only benefitting parts of Lodi as our P G & E rates continue to raise exponentially! We will have loss of property use and loss of property value along with negative visual, potential health and wellbeing impacts.

We respectfully urge the CPUC to deny this project based on the proposed routes and negative impacts to the farmers and residents within the scope of this project, or at least find less impactful routes or use existing towers and/or consider underground options.

Respectfully Submitted

Shannon R. Oxford

Gayle L. Oxford

Project Name: Northern San Joaquin 230kV Transmission Project

Application Number: A23-0918-23

REQUEST FOR PUBLIC MEETINGS AND HEARING IN LODI-LOCKEFORD AREA

Submitted by:

Shannon R. and Gayle L. Oxford

Oxford Ranch and The DOVES Guidance Program School

13749 E. Kettleman Lane

Lodi, Ca. 95240

(209) 329-7034 or (209) 329-7035

ox4ranch@gmail.com

ASMT 053-040-280-000

Comments and concerns submitted by mail 9-19-23

1. We never received personal notice of this project nor any follow up letters including the September 8th 2023 Letter from P.G.& E. **RE: Notice of Application A.23-09-001 for Authorization from the California Public Utilities Commission to Construct the Northern San Joaquin 230kV Transmission Project.** Which, by the time most residence in the area of the project received this letter, had only two weeks to respond with a protest.

2. Route Selection – Why not use existing power towers and lines versus new corridors. We already have 3 huge power towers and multiple lines on our property that is approximately 300 feet from our home. We are concerned about the effect of new poles and lines on or near our property. We have livestock that graze under the existing lines and do not want any more. We are also concerned of the effect of EMFs on our livestock and on the special needs children that attend our non-profit program/school The DOVES Guidance Program tax ID #26-3251554. Adding additional lines would be an encroachment on our personal health and safety and adding a visual eyesore and a component that will bring down our property value. We feel that adding new poles and line to our property when there are already 3 existing towers and lines, would be unfair, unjust and unwarranted. We feel there are ample alternative routes and solutions.

We respectfully urge the CPUC to require PG&E to conduct public meetings and hearing(s) in the Lodi and Lockeford area.

Respectfully Submitted,

Shannon R. Oxford

Gayle L. Oxford

Project Name: Northern San Joaquin 230kV Transmission Project

Application Number: CPCN Application No. A2309001

Comments and concerns with the proposed Northern San Joaquin 230kV Transmission Project

To: Boris Sanchez, CPUC

Submitted by:

Shannon R. and Gayle L. Oxford

Oxford Ranch and The DOVES Guidance Program School

13749 E. Kettleman Lane

Lodi, Ca. 95240

(209) 329-7034 or (209) 329-7035

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Comments and concerns submitted by mail and email 2/5/2024

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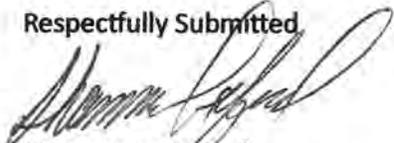
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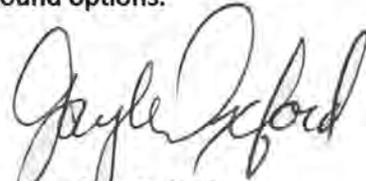
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Shannon R. Oxford
2/5/2024


Gayle L. Oxford
2/5/2024

Project Name: Northern San Joaquin 230kV Transmission Project

Application Number: A23-0918-23

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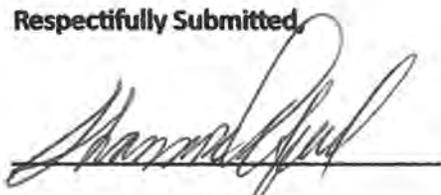
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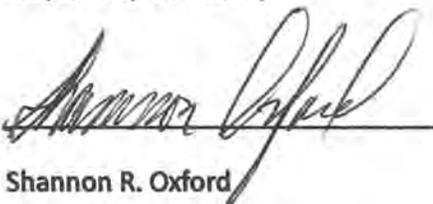
1. This is an additional letter to the letter we sent on 9-19-23, as we have received new information since, involving our property.

2. We have learned from a conversation with the PG&E Representative Erin Rice, that the proposed new 230 kV lines will be approximately 50' from our property to the north; our home is only about 50' from that property line which will put our home very close to these lines. We have not received written notice of this fact. We are concerned about the health risk, the ascetics and the potential depreciation of our property. If these lines go in we will be sandwiched between 4 high voltage lines as there are already 3 tower lines to the south of our home. This proposed route is in a very large acreage field; couldn't this route be moved further into that field?

3. We have also learned that our private driveway to our home is being considered as a proposed access road to the proposed new lines – fig 3.5-1 project components and Construction Elements page 8 f 26 in Northern San Joaquin 230vK Transmission Project Application. Using our private driveway is unacceptable as it would not be able to handle heavy equipment, traffic and the fact that it floods in the winter during heavy rains makes it inaccessible. Our trees on the driveway are noted for possible trimming or removal, these trees provide shade and shelter for our livestock. We are also concerned with the potential of noise, dust and hazard to children and livestock. With the previous installation of a tower installed on our property we know the damage that can be done to the property. There are better alternatives then using our private driveway, such as the Paddy Creek Levee road or the farm road to the east of our property.

We respectfully urge the CPUC to require PG&E to conduct public meetings and hearing(s) in the Lodi and Lockeford area.

Respectfully Submitted,

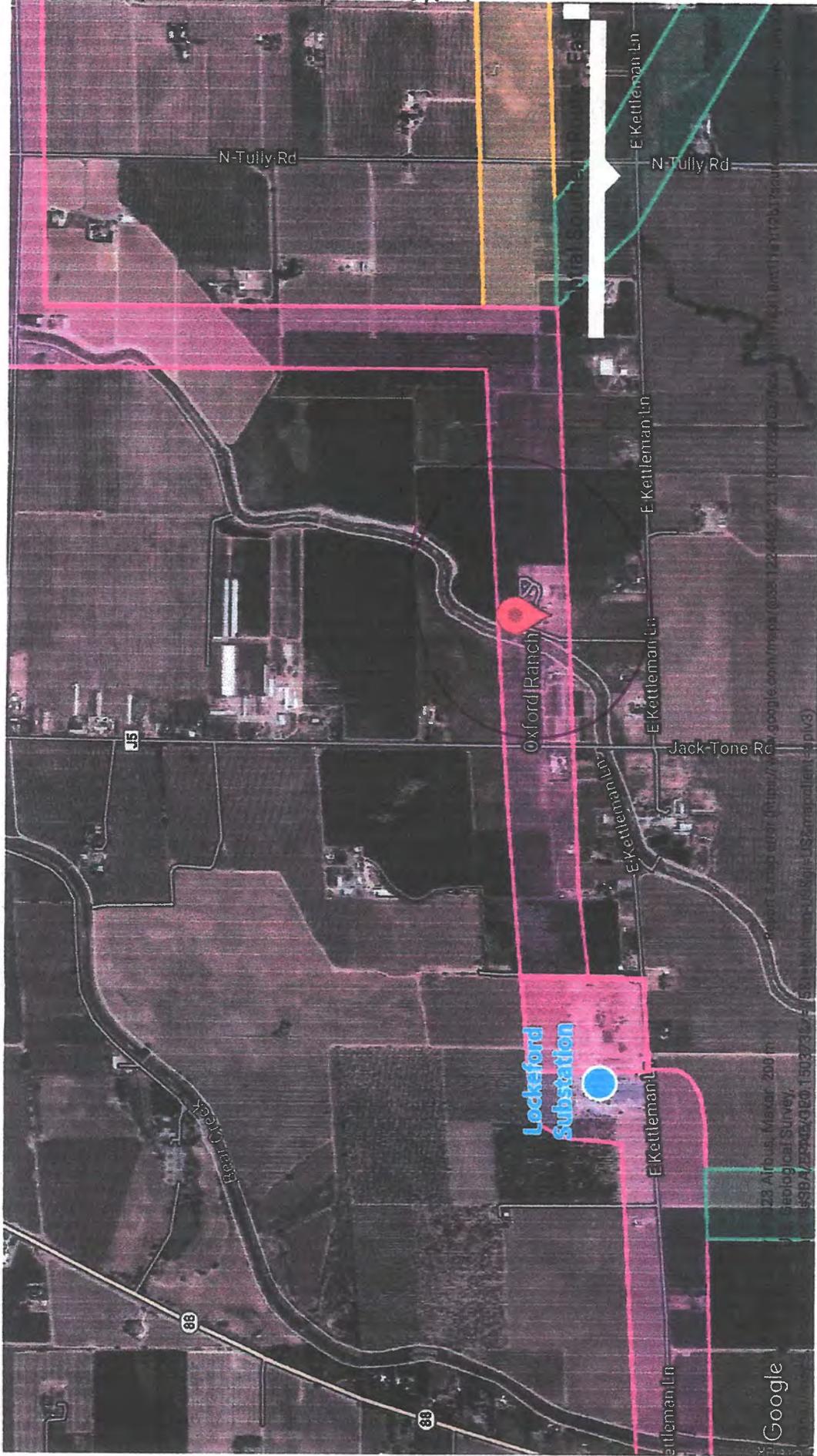


Shannon R. Oxford



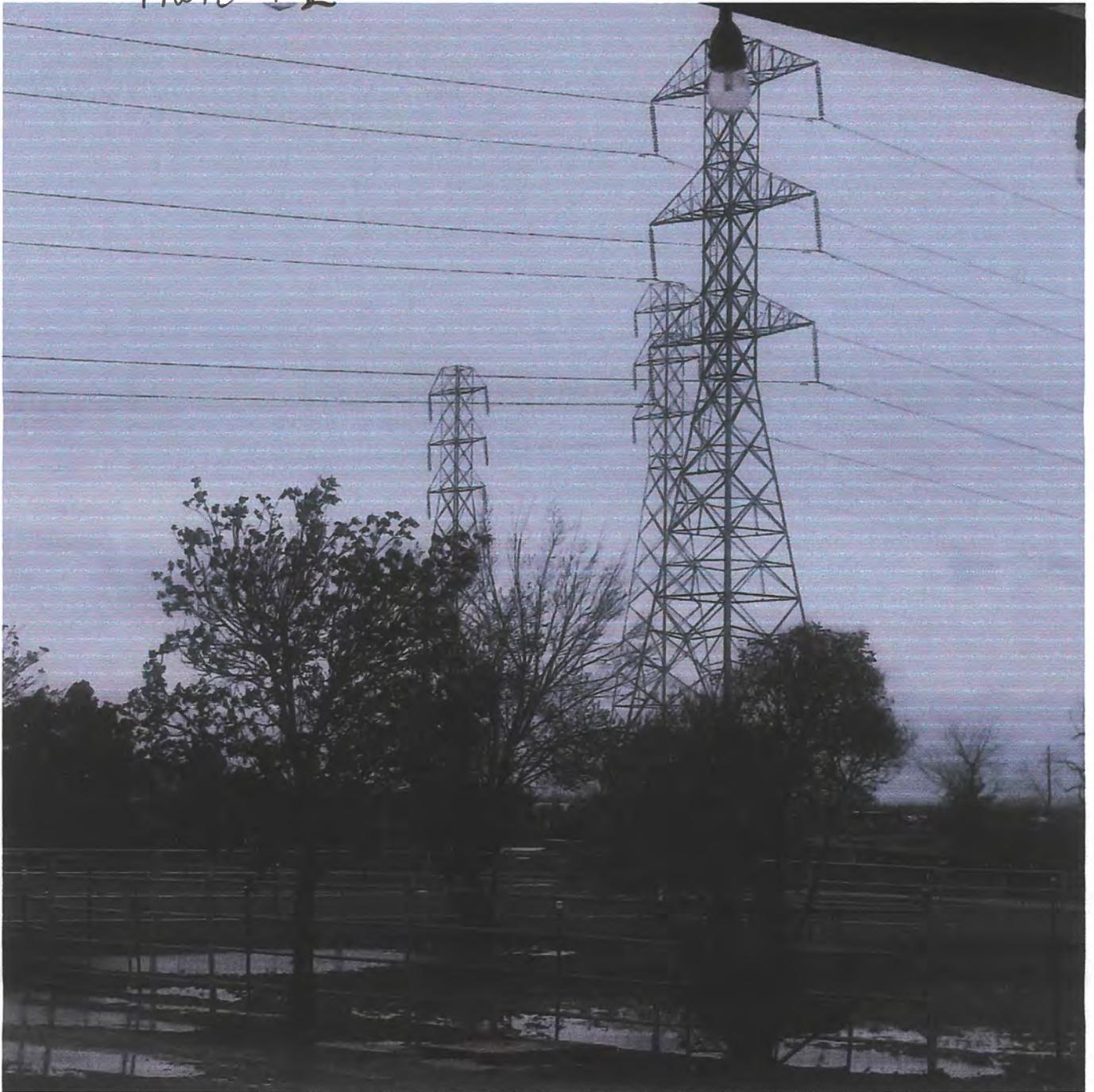
Gayle L. Oxford

Photo #1



all 3 proposed routes follow our property line
 just 50' from our homes.

Photo #1

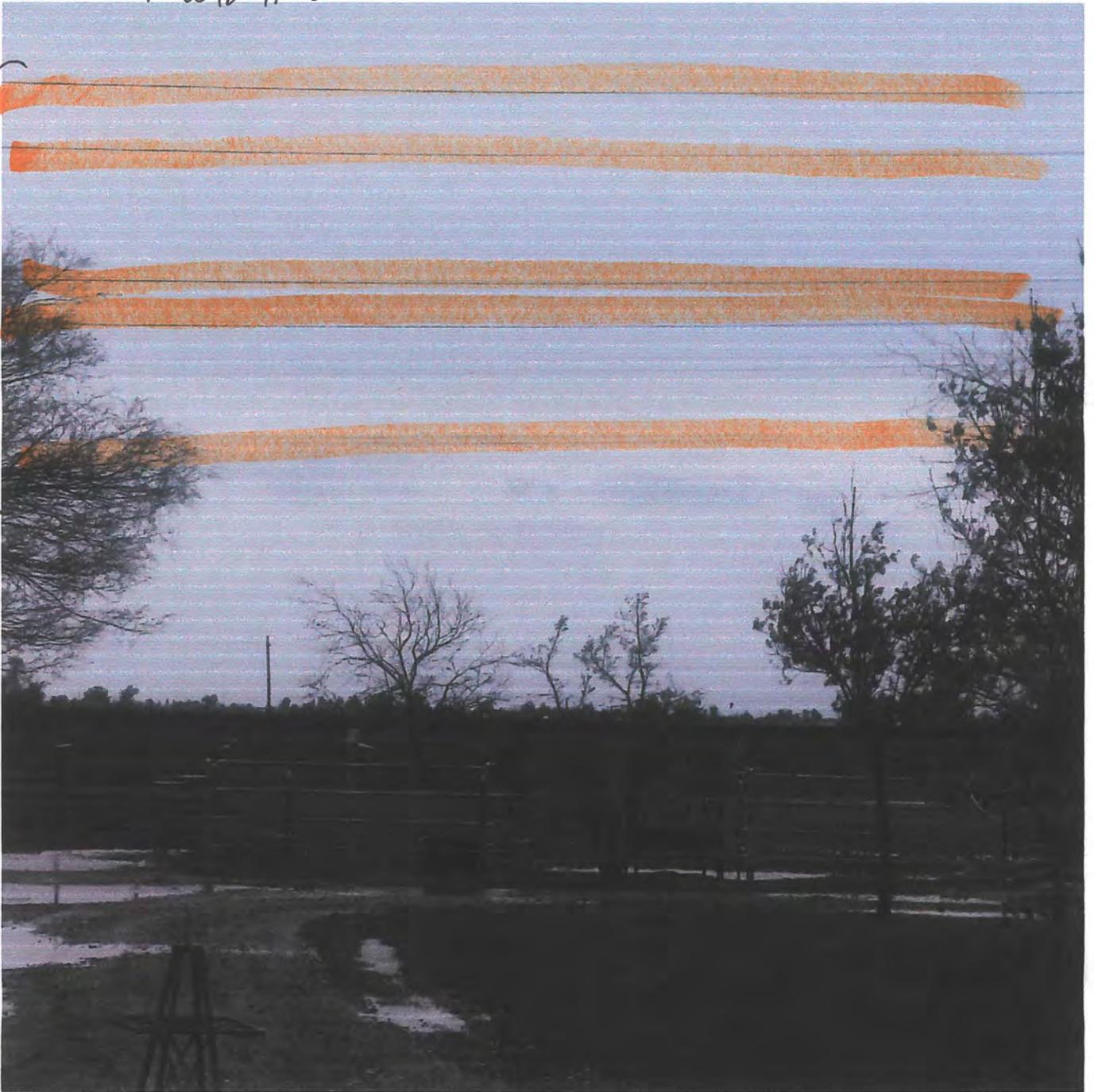


existing Power lattice Towers & lines, 150' to 200' from
our fit daron property of S&G Oxford 8.35 acre parcel
13749 E. Kettleman, lane, Lodi, Ca. 95240

Loss of land use, approx. 1 acre

Photo # 3

lines

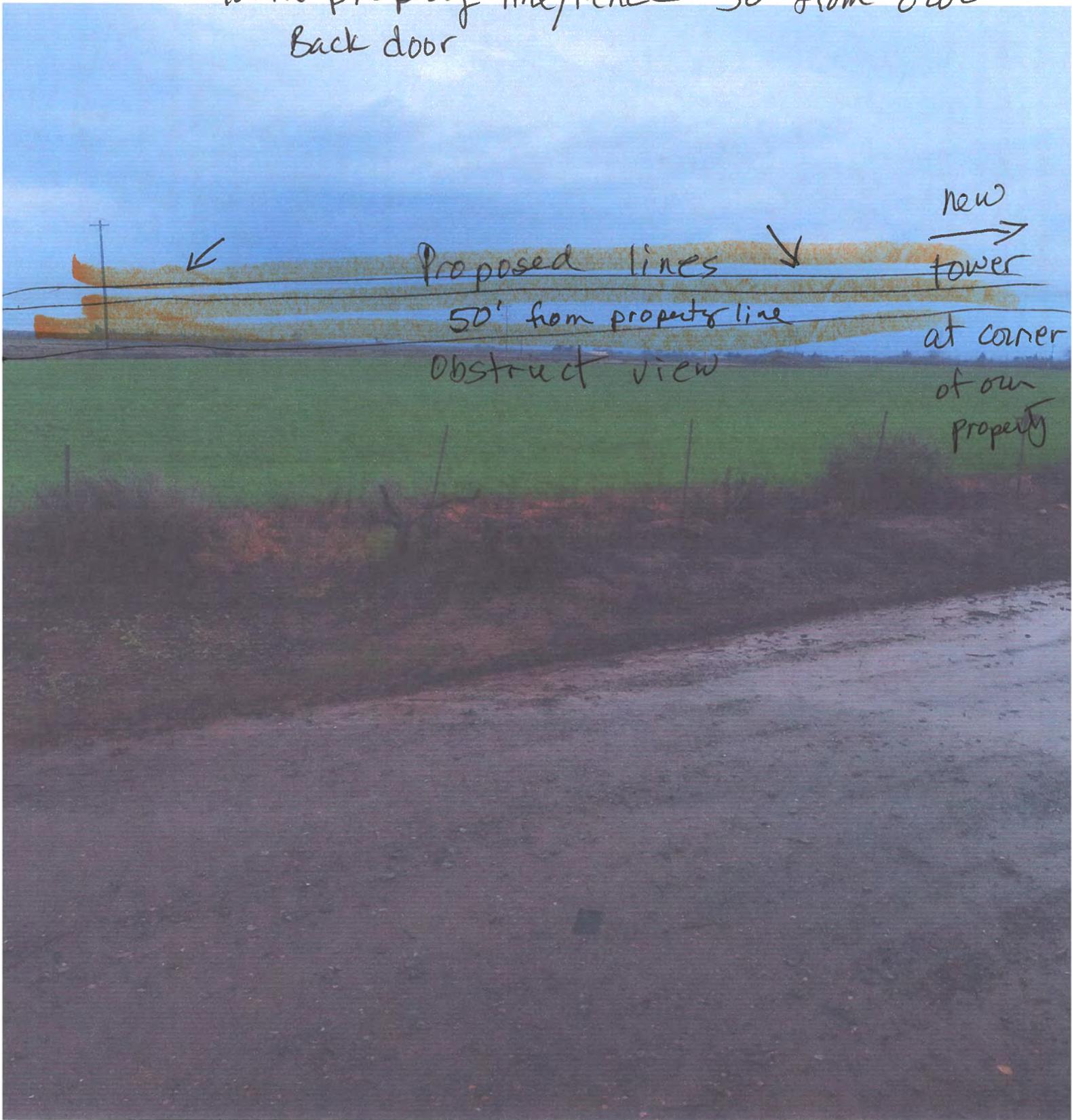


Exiting Power lines across property just approx
150' to 200' from our front door

Loss of hand use 1 1/2 to 2 acres

#4

North property line/fence 50' from our
Back door



Proposed lines

50' from property line

obstruct view



new
tower

at corner
of our
property

#5

Rental on our property
North view 90' from new proposed lines



#6

Looking from our Back Door



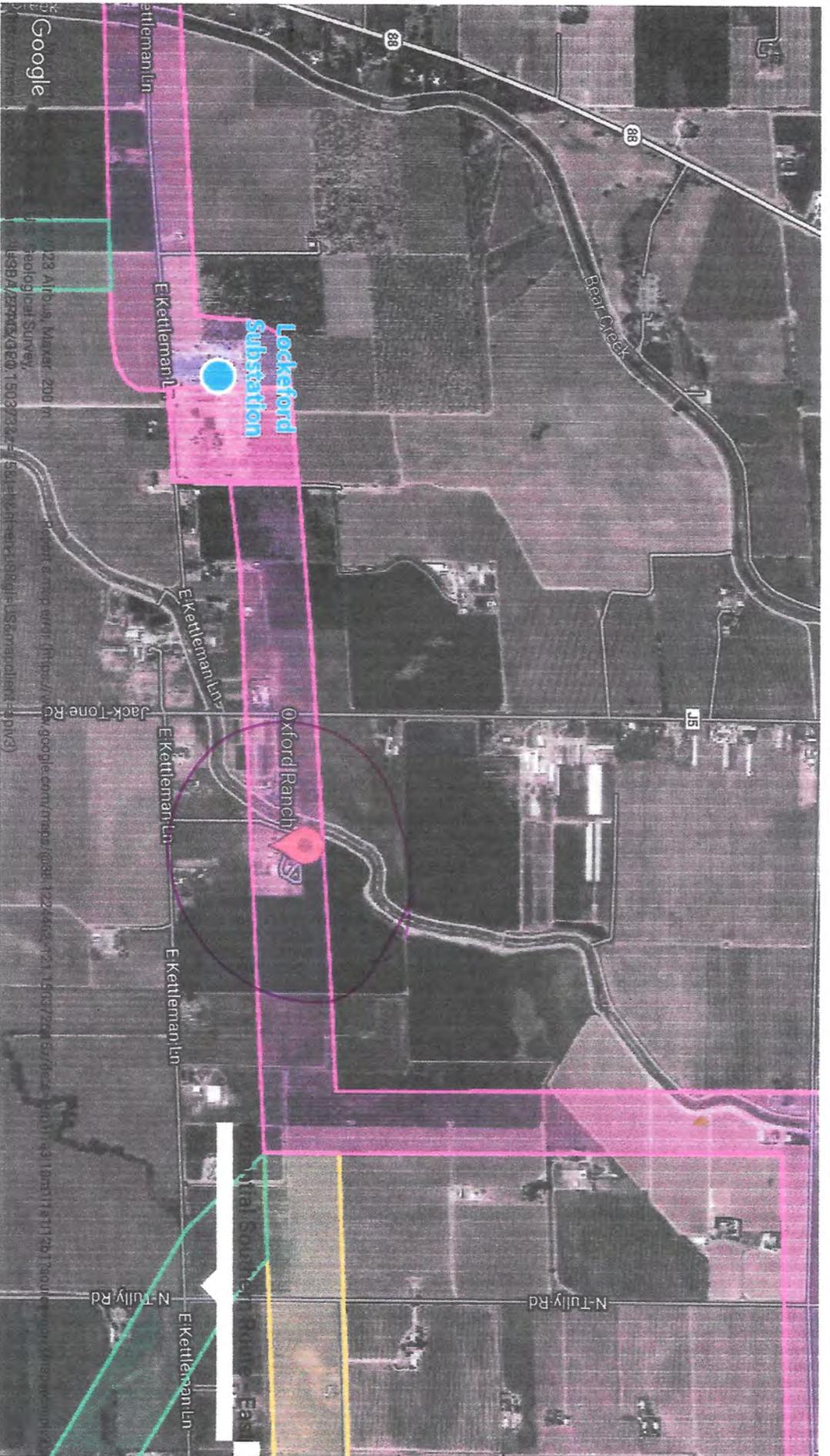
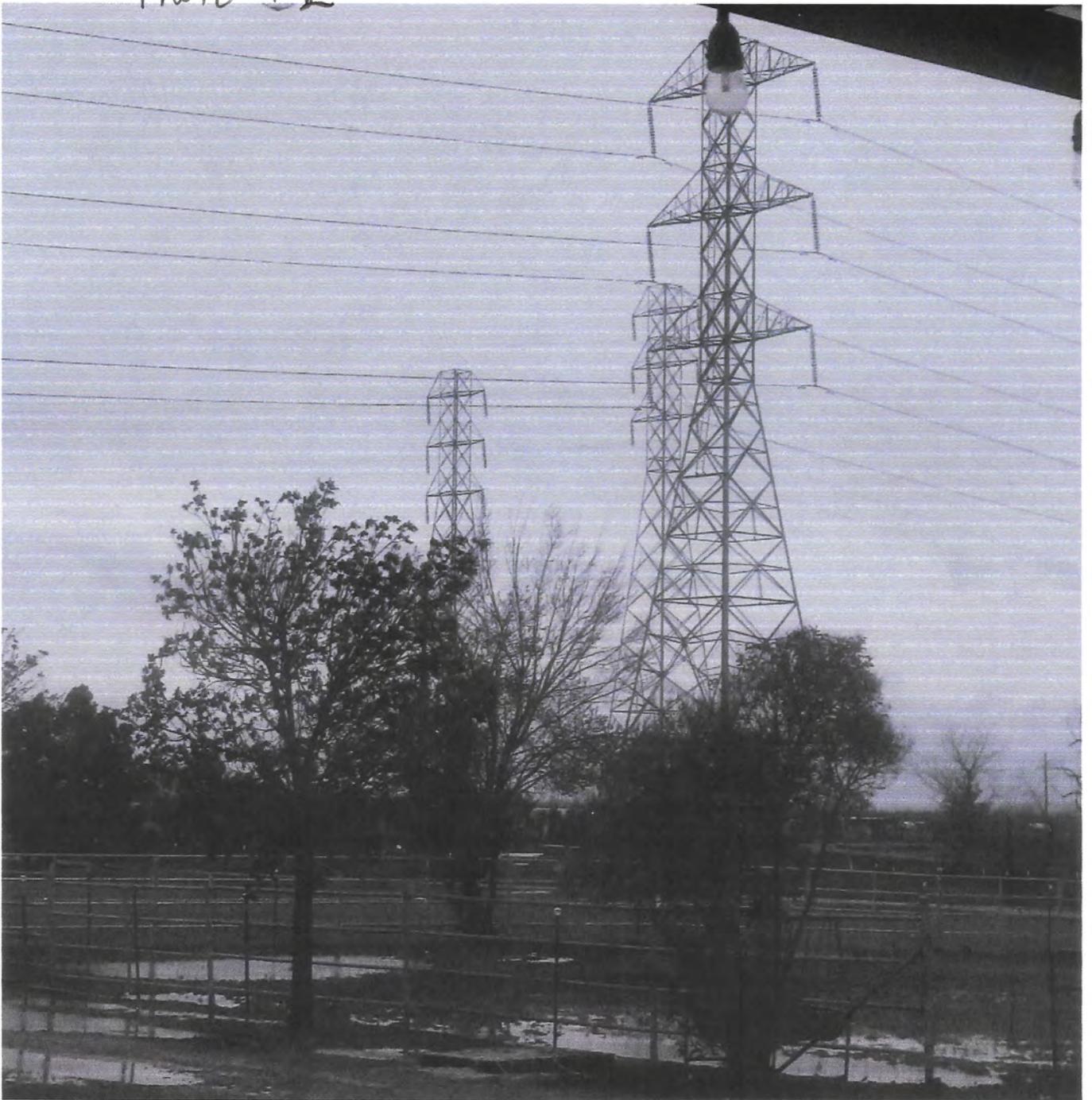


Photo #1

all 3 proposed routes follow our property line just 50' from our homes.

Photo #1



Existing Power Lattice Towers & lines, 150' to 200' from
our site on property of S&G Oxford 8.35 acre parcel
13749 E. Kettleman, Lane, Lodi, Ca. 95240

Loss of land use, approx. 1 acre

Photo # 3

Lines

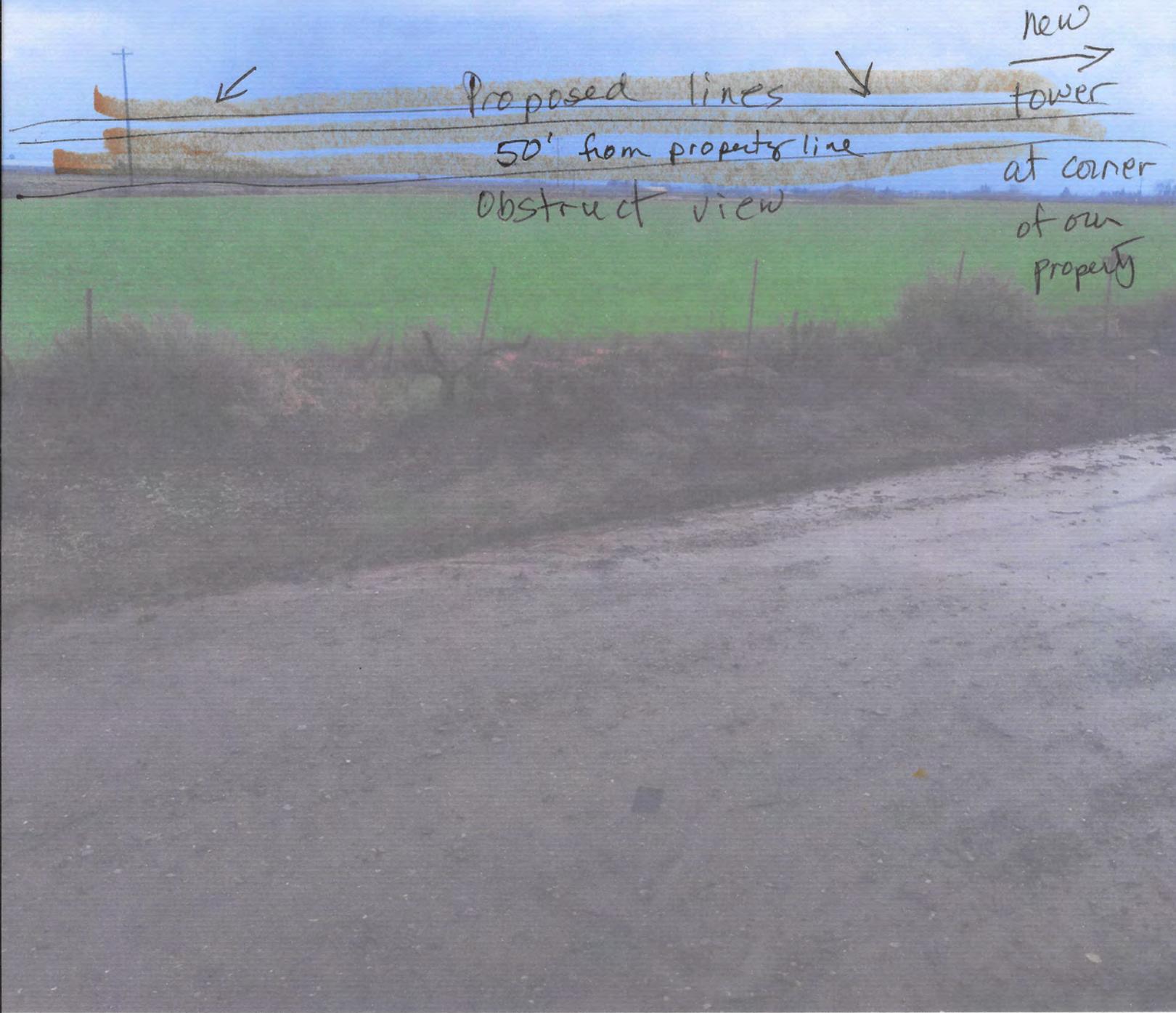


Exiting Power lines across property just approx
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North property line/fence 50' from our
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Proposed lines



new
tower

50' from property line

obstruct view

at corner
of our
property



Proposed Pole

Proposed lines

#6

Looking from our Back Door



George and Angeliki Perlegos 155506 N Curry Ave , Lodi, Ca. 95240
45863 Bridgeport Pl
Fremont Ca 94539
408497 4754 / gperlegos@yahoo.com

February 7, 2024

CPUC, Boris Sanchez,
c/o Ascent, Att Heather Blair
455 Capital Mall , Suite 300
Sacramento , Ca 95814

Re: Northern San Joaquin 230 KV Transmission Project,

Dear CPUC Commissioner's

I attended the January sponsored Zoom meeting and objected to the PGE 230 KV power lines and was asked to submit my previous objection letters I had sent to the CPUC and I attached here.

Also the potential Northern Rout had big impact on the PERLEGOS FARMS (APN : 04923004, 04922009, 04922008, 04922006)

and the present Southern Route has a big Impact on APN 06113117 and APN 06113227 and APN 06113228 all on Curry Ave , Lodi Ca.

As I said in the January 30, meeting the 230 KV PGE power lines do not belong in this part of Lodi.

This is an established over 100 years Farm Lands , Vineyards, Cherries, Wineries , etc. We have homes pumps, shops, barns, kids and etc and all will all be impacted as we said in our attached letter.

FEASIBLE ALTERNATIVES TO THE PROPOSED PROJECT

#1 PGE needs to stay on their existing CENTRAL ROUTE to either Doubling the 60 KV lines to 115 KV which as we understand will meet most if not all of the projects objectives.

Or go Underground on their existing easement Central route.

Or bring 230 KV lines on the existing easement Central Route.

#2 Alternative -- " NO PROJECT"

Given the many potential negative impacts , there is a clear case against pursuing any version of the project. The project site will remain unchanged and no transmission lines will be developed. As a result there will be no visual, no noise, no geologic, air, health , habitat, or economic impact, among others .

The PERLEGOS FAMILY and Every property Owner along the Southern Route prefer that PGE stays in their CENTAL ROUTE along Victor Road .

Even though LODI has not Annexed this section of lands we are well established for over 100 years and it never happened before that PGE will bring 230 KV power lines in an establish area , established part of the City of Lodi even though we are not Annexed yet.

Thank you

George and Angeliki Perlegos

408 497 4754

gperlegos@yahoo.com



LUBIN OLSON & NIEWIADOMSKI LLP

THE TRANSAMERICA PYRAMID

600 MONTGOMERY STREET, 14TH FLOOR SAN FRANCISCO, CALIFORNIA 94111

TEL 415 981 0550 FAX 415 981 4343 WEB lubinolson.com

April 21, 2022

GERALD M. MURPHY
Direct Dial: (415) 955-5091
Email: gmurphy@lubinolson.com

SENT VIA E-MAIL [MTSN@pge.com]

Matthew Swain, Esq.
Russ Building
235 Montgomery Street, 17th Floor
San Francisco, CA 94104

Re: Northern San Joaquin 230 kV Transmission Project, formerly known as Northern San Joaquin Power Connect ("Project")

Dear Mr. Swain:

This law firm represents George Perlegos and Angeliki Perlegos (the "Perlegos Family") with regard to the above-referenced Project under consideration by the Pacific Gas & Electric Company ("PG&E"). It is our understanding that PG&E is preparing a Project application for submittal to the California Public Utilities Commission ("CPUC") in mid-May, 2022. The Perlegos Family submits the below comments for consideration in PG&E's preparation of its application and urges PG&E to reconsider how the routing options will be characterized in the application filing, as the Project poses significant wildfire dangers and health risks, would drive up energy rates and threaten sensitive resources, environmental communities, and over 100 years of winegrowing and agricultural history, including any future development of the land.

We are hopeful that the concerns of the Perlegos Family can be addressed at this initial stage of the pre-application process, and appreciate PG&E's careful consideration of the following issues.

PG&E'S INADEQUATE PRIOR PUBLIC NOTICE OF THE PROJECT AND REQUEST FOR FURTHER PUBLIC HEARING

As a preliminary matter, PG&E's web page for this Project has not been updated since the 2019 public open house. Although the Project website includes prior "fact sheets," a Project map, and old materials from previous open houses, our clients were never consulted or notified about these open houses from several years ago. We are concerned that similarly-situated members of the community also were not adequately notified by PG&E about the Project and therefore were denied an opportunity to comment on how the Project might impact their properties. To provide a more thorough public review process, we ask that the Project go through further public hearing before the Project application is submitted to the CPUC. Please

additionally ensure that any future notice of open houses or public workshops for the Project, or any variation of it, are also directed to our law firm so the Perlegos Family—and other community members—may actively participate in what should be an open and fully transparent public review process.

THE PROJECT'S DIRECT ADVERSE IMPACTS ON THE PERLEGOS FAMILY PROPERTIES AND SURROUNDING AREA

If approved by the CPUC, the state agency with jurisdiction over the siting of this type of project, our current understanding is that the Project would include connecting PG&E's existing Brighton-Bellota 230 kV Transmission Line into PG&E's Lockeford Substation and building a new 230 kV double circuit transmission line from PG&E's Lockeford Substation to a new 230 kV switching station on Thurman Street in Lodi. The study area on the Project's website includes three potential transmission line routes: (1) Northern Route; (2) Central Route; and (3) Southern Route.

It is our understanding that the potential Northern Route is PG&E's preferred route. Such alignment, however, would cross four parcels owned by the Perlegos Family [APN 04923004; APN 04922009; APN 04922008; and APN 04922006]; whereas, the potential Southern Route would cut across one of their properties [APN 06113117] (collectively, the "Perlegos Family Properties").¹

The affected properties are all located in a secluded, nature-based setting, and have been in the Perlegos Family for generations.



[Peter and Helen Perlegos with a family friend in front of their vineyards circa 1990]

¹ The map enclosed herein depicts the impacted properties in relation to the proposed Northern and Southern transmission routes.

After immigrating from Greece in the 1950s, Peter Perlegos, George Perlegos' father, purchased the properties and built his family home at 15506 N. Curry Ave., where he raised his family. The Perlegos Family has continued Mr. Perlegos' legacy, establishing their home and raising their children in the area. Like Mr. Perlegos before them, the family today actively cultivates Zinfandel vineyards on their properties—a varietal that has thrived in Lodi as far back as the late-1880s—as well as mature cherry trees.

All of this is at risk by the Project's proposed Northern or Southern alignments, which propose constructing transmission lines and towering steel poles across the Perlegos Family Properties. Impacts from either potential route would scar the views and skyline, destroy the tranquil, natural setting of the area, and devastate the Perlegos Family Properties and surrounding areas, including but not limited to the following:

- The proposed transmission lines would have adverse aesthetic impacts and be out of scale with the area and community; would clash with established infrastructure and land uses, including agricultural land uses such as vineyards and orchards; and would degrade the foreground character or scenic quality of a visually-important landscape by introducing dominant visual changes in the landscape with special scenic and natural qualities.
- The Project would potentially conflict with sensitive resources and habitat areas and run counter to existing and proposed land uses.
- There is significant concern over the potential for health risks associated with the electromotive force emitted from the transmission lines.
- The overhead power lines also would have noise impacts from the “buzzing” during operation.
- The overhead power lines present a significant and unavoidable fire hazard risk in the area (*e.g.*, if they were downed in an earthquake or in high winds).
- Moreover, the transmission lines potentially expose sensitive receptors to detrimental pollution concentrations and may further contribute to a collective or combined air quality effect, including in combination with existing and foreseeable other projects, that leads to violation of air quality standards, even if the individual effect of the Project/activity is relatively minor compared with other sources.
- The Project may additionally adversely affect a listed endangered, threatened or proposed species or designated critical habitat, or a non-listed special-status plant or animal species either directly or through habitat loss or modification, as well as native plant communities, including riparian areas that deposit the fertile soils so ideal for agriculture in Lodi, as well as other sensitive communities.

- The Project would drive up energy rates. The cost of electricity service is rising in California, and this Project—including any pass through of land acquisition costs²—would significantly add to that burden and increase the cost of electrical service and rates in the area.
- Constructing transmission lines would also substantially decrease property values for the Perlegos Family Properties and other nearby properties, and would make any property it touches commercially worthless. Properties in the area are being rezoned due to housing shortages, and the potential value of the land is considerable, which PG&E should take into account.

Of course, the Project's devastating potential impacts—under either the Northern or Southern alignment—are not limited to the Perlegos Family Properties alone. The Project would have similarly detrimental impacts on numerous area farms, wineries, and tasting rooms, and our understanding is that widespread opposition to the Project, as currently proposed, is considerable among members of this community.

FEASIBLE ALTERNATIVES TO THE PROPOSED PROJECT

One of the most important aspects of this pre-application processes is identification and assessment of reasonable siting alternatives that potentially avoid or minimize impacts of a project. Below is a non-exhaustive range of alternatives for consideration that would avoid or substantially lessen the Project's potential adverse impacts.

Alternative #1 – No Project

Given its many potential negative impacts, there is a clear case against pursuing any version of the Project. Under the “no project” alternative, the Project site would remain unchanged, and no new transmission line development would occur. As a result, there would be no visual, noise, geologic, air, habitat, health, or economic impacts, among others, under this alternative. This is the preferred alternative of the Perlegos Family.

Alternative #2 - Upgrade Existing Transmission Lines Along the Central Route

The second alternative involves upgrading the multiple existing 60kV rights of way along the “potential Central Route,” which would meet most, if not all, of the Project objectives, as far as we understand them.

In our assessment, upgrading Lockeford-Industrial to 115kV would be an easier staged upgrade than what is proposed by the Project. Using a single pole 115kV would likely take the same right-of-way, and subsequent upgrades to 115kV could also happen at Lockeford-Lodi #2

² The Perlegos Family intends to vigorously oppose any version of the Project resulting in condemnation of any portion of their properties.

& #3. Any and all of these upgrades could occur within the proposed 2026 timeline at lower cost and would likely be a more welcomed alternative among community members.

This second alternative is favored because it would completely resolve numerous of the environmental and economic impacts, including but not limited to the concerns raised in this letter. For example, this alternative would avoid the significant, permanent aesthetic impacts along the Perlegos Family Properties and other properties. Instead of constructing a full-blown 230kV transmission line through the middle of Lodi, impacting sensitive natural lands and important farm land, and other communities and attractions within the area, Alternative #2 would substantially maintain the status quo.

PG&E should consider putting out a proposal to upgrade a 60kV line to 115kV in the shorter term rather than pursue the currently contemplated Project. At minimum, PG&E should provide a more robust and thorough assessment of the feasibility of this alternative.

REQUEST FOR PROJECT INFORMATION

On behalf of the Perlegos Family, we request the following information and materials concerning the Project:

1. A clear explanation of why the Project is considered by PG&E to be necessary, including the assumptions and calculations on which the Project is based, and why the power would need to be run through the Westside of Lodi.
2. Identification of the intended customers for this Project.
3. A specific description of PG&E's distribution needs in the area that would be addressed by the Project and how an upgrade of the existing transmission lines would or would not meet those needs.
4. Any technical analysis of the proposed transmission line routes and study of feasible alternatives, including but not limited to a robust assessment of upgrading the existing Central Route.

*

We are optimistic that the Perlegos Family, community, and PG&E can find a mutually agreeable path forward that provides reliable energy transmission while minimizing impacts and cost to ratepayers. On behalf of the Perlegos Family, we warmly invite your principal decisionmakers to tour the potentially-impacted properties. We believe a tour of the properties would help provide PG&E with a different view of the affected landscape, farms, and natural scenery so worthy of preservation.

Matthew Swain, Esq.
April 21, 2022
Page 6

Please let me know when you are available to meet and discuss these issues further. You may contact me directly at (415) 955-5091, or by e-mail at gmurphy@lubinolson.com.

Very truly yours,



Gerald M. Murphy

Encl. (1)

cc: The Honorable Eleni Kounalakis, Lieutenant Governor (by e-mail: eleni.kounalakis@lgt.ca.gov)
Supervisor Chuck Winn – San Joaquin County Board of Supervisors, District 4 (by e-mail: cwinn@sjgov.org)
Denise Warmerdam, Chief of Staff for Supervisor Winn (by e-mail: dwarmerdam@sjgov.org)
Lodi City Mayor Mark Chandler (by e-mail: mchandler@lodi.gov)
Lodi City Council (by e-mail: citycouncil@lodi.gov)
Rachel Peterson, CPUC Executive Director (by e-mail: rachel.peterson@cpuc.ca.gov)
John Ketcherside, PG&E Sr. Electric Outreach Specialist (by e-mail: JPKa@pge.com)
Qing Zhang, PG&E Transmission Planning Engineer (by e-mail: QXZ5@pge.com)
George Perlegos (by e-mail: gperlegos@yahoo.com)
Pete Perlegos (by e-mail: peteperlegos@gmail.com)
Shawn Zovod, Esq. (by e-mail: szovod@lubinolson.com)
Philip Sciranka, Esq. (by e-mail: psciranka@lubinolson.com)
Susan Schneider (by e-mail: schneider@phoenix-co.com)

LOCKEFORD INDUSTRIAL 60KV

INDUSTRIAL

INDI

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COMMEN

KEY

INDI

Industrial Way

Beckman Rd

Vine St

Curry Ave

Lockeburg Rd

Reilly Rd

Pine Rd

Host Rd

Kettelman Ln

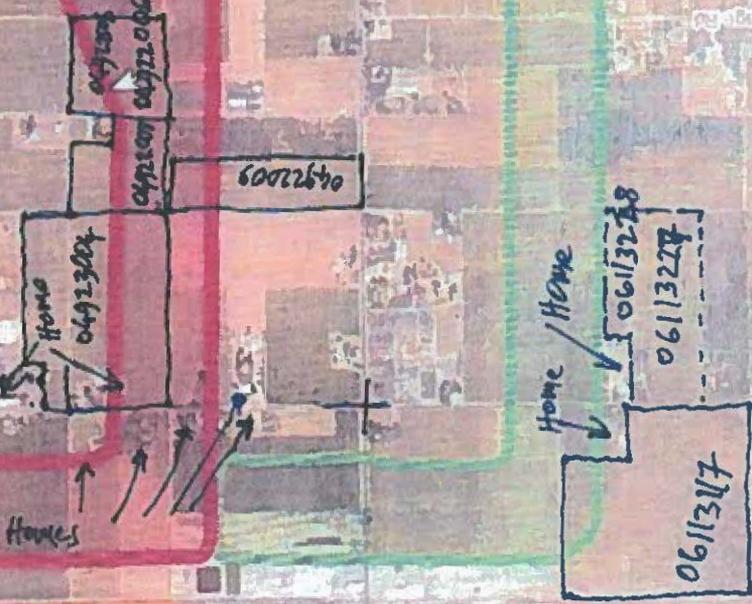
Kettelman Ln

Beckman Rd

Wells Ln

Aprie Rd

Village Rd



From: Gust Perlegos (Farm Owner, 5102269585)

To: CPUC

Date: February 8, 2024

Subject: PG&E's Northern San Joaquin 230KV Transmission Project (Application No. A.23-09-001)

PG&E has filed an application for a new 230KV transmission line from Lockeford to Lodi. The rationale for tripling the current power capacity with this new 230KV double circuit line is unclear. It seems unlikely that PG&E will acquire three times their current customer base to justify such an increase.

PG&E's plan is to make the new 230KV line fully operational to the point where the 60KV lines are not needed. Then PG&E can disconnect these and reconfigure them.

Addressing overheating and reliability issues caused by overloading could be more efficiently managed by upgrading one of the four existing 60KV lines to a double circuit, thereby enhancing capacity by 20%. Should there be a need for greater transmission power, converting a 60KV line to a 138KV double circuit line—utilizing either single wood or steel poles—would result in a 75% increase in capacity. This solution would not only sufficiently exceed their capacity requirements but also reduce the right-of-way impact concerning radiation. By using existing easements, PG&E could avoid introducing 230KV overhead power lines across numerous farms to the east of Lodi, which are currently not near any such lines; the nearest are at least 10 miles away on both the east and west sides of Lodi.

Employing existing easements would also sidestep the potential financial and moral implications for property owners considering selling their land due to the installation of new lines, as well as concerns about excessive EMR exposure.

The proposed new line presents several issues:

1. Property owners, especially those with small parcels ranging from 10-20 acres, will strongly oppose having these lines cross their land due to potential financial losses and ethical concerns.
2. The exposure to electromagnetic radiation (EMR) is worrisome for many farmers who spend extensive periods working in the fields—pruning, weeding, removing leaves, thinning, and tying vines—all in close proximity to these lines. Moreover, there is apprehension that laborers may be reluctant to work near these lines, which could significantly affect farming operations.
3. Residing on farms within 1200 meters of high voltage lines or where magnetic radiation exceeds 1.0 mG may elevate the risk of leukemia or other health issues in children, as indicated by research on the health impacts of living near such power lines.
4. Additionally, the hazards posed by fallen high voltage lines or fires, which can occur during the dry season, should not be underestimated. In addition, threatened and endangered species maybe displaced, harmed or affecting breeding from the project. These species would include but not limited to, Owls(Elf and Grey), Large-Flowered Fiddleneck, California Tiger Salamander, Tricolored Blackbird, Swainson's Hawk, Giant Garter Snake and riparian brush rabbit. A full list of these can be found at <https://wildlife.ca.gov/Conservation/CESA>.

We appreciate your attention to these considerations.

Gust Perlegos

From: [Jim Grady](#)
To: [NSJTP](#)
Subject: PG&E Power Line Project
Date: Friday, February 9, 2024 1:22:14 PM

To Whom It May Concern: I

My name is James Grady Jr.

I own vineyards at 14051 N. Hwy 88 in Lodi.

I first became aware of this project when I received a letter from PG&E approximately a year ago.

My son and I have farmed winegrapes at this location for the past 20 years.

My son lives in a home on the property and we also have a large storage building for our vineyard equipment.

As we have been told the line is planned to go down a dirt road that bisects our ranch with vineyards to the north and south of the road.

Our farming will be impacted significantly. There are years when the rains cause the clay soil to be too wet for the tractor to apply sulfur dust to prevent mold and mildew in the grapes and we have dust applied via crop duster. Once the line is placed if it is done as proposed down the middle of our ranch the planes will likely not be able to do so.

My son's house is on that lane and I believe the line is planned for approximately 75 feet in front of his home. That will make his home which he has invested in for 20 years as well as the surrounding yard likely worthless. I don't think there will be a market for a home to be purchased with power lines such as these in the front yard!

Our vineyard was purchased and has been developed at considerable expense over the past 20 years and we just are in the 2nd year of a 20 acre replant of the south half of our field. The value of the vineyard property will be significantly reduced if the power line is allowed to go in down the middle of the property.

Suggested solutions:

I would like to see the power line placed underground. I know that is more expensive, but PG&E will be making significant income from the delivery of the power and I am sure will just increase electric rates to whatever amount is necessary to remain profitable. That would spread the cost of undergrounding the line over all the consumers, thus sharing the expense with everyone instead of just destroying local property owners land values.

A much better route would be to use existing power line right of ways. Perhaps the line could be undergrounded down the middle of kettleman lane or harney lane and not cause anyone hardship.

At the very least the line should be moved to the north or south edge of our vineyard so it does not impact farming as much. That would also mitigate the problem of

conflicting with my son's home.

Should this project proceed as planned, I see little option for me other than to sue PG&E and the City of Lodi Power Company for the lost value of my vineyard property and the value of my son's home.

I get the need for electricity for the City of Lodi to grow, but destroying land owner and home owners property values and destroying the aesthetics of living on said land is not an acceptable cost. Undergrounding the line avoids all the aesthetic damage as well as land devaluation and would be paid for ultimately by all citizens to spread the cost.

Thank you for your attention to my letter,

James J. Grady MD

From: [Jim Natsis](#)
To: [NSJTP](#)
Subject: PG&E Northern San Joaquin 230 KV Transmission Project
Date: Wednesday, February 7, 2024 10:57:42 AM

Dear Mr. Sanchez/Ms. Blair,

My parents and sister live at 13960 N. Locust Tree Road and 13972 N. Locust Tree Road, respectively. Both homes are dangerously close to where the proposed towers and transmission lines will be situated, not to mention that they will be going through a large section of our vineyard located just north of the two homes.

We strongly oppose this project. It is an unacceptable infringement on my parents and sister's quality of life and is detrimental to their health and property values. We are especially concerned about any long-term health issues that will arise from the high-voltage transmission lines due to the proximity of the homes to the location of the towers that will run through our property.

Furthermore, the project will decrease our property values because of these potential long-term health issues, and the overhead transmission lines and towers will also degrade the environment, further erode property values, and severely impact our ability to farm our vineyard.

This project should continue running west along Kettleman Lane instead of being routed south at Highway 88 to then run west through multiple farms and vineyards as currently proposed. The current proposed route/path is unacceptable.

Sincerely,

Jim Natsis
(408) 857-7332

From: [Joe Petersen](#)
To: [NSJTP](#)
Cc: [Jeannette Petersen](#)
Subject: Lodi PG&E project
Date: Monday, February 5, 2024 12:17:25 PM

Boris:

The lines go down the center of my already narrow vineyard creating an unnecessary impact on my ability to farm it. It unnecessarily increases the amount of farmland that will be lost due to the project. This central location further diminishes if not eliminates the highest and best use of the property, building 2 homes on it.

By slightly extending the angle after crossing Locust tree road (heading west) would put the line at the northern edge of my property as it heads west. Slightly shortening the line at the same location would put the lines at the southern boundary of my property. Either option would have less of an impact on my property and the use of it. These slight changes would reduce the loss of prime farmland because existing service roads would be used to access the poles.

It would be best if you chose the shorter angle because there is an existing PG&E easement on the south side of my field - ultimately saving the ratepayers from purchasing the whole easement.

In terms of impact to my operation and land, going to the north or south edge of my field reduces the impact.

I am not against the project, I am asking you to reduce its impact.

The property being impacted is located approximately 1/2 mile south of Kettleman lane and extends from the east side of Alpine road easterly to the half way point between alpine road and Locust tree road.

I do not have the APN with me. If you need it, let me know and I will provide it.

Thank you for your time.

Joe

Joe Petersen
Petersen & Company
(209) 368-8010
Joe@AgLand.org
BRE# 01489372



Sent Via Email

February 9, 2024

Boris Sanchez
California Public Utilities Commission
Energy Division - Infrastructure Permitting & CEQA
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102
Email: boris.sanchez@cpuc.ca.gov

RE: PG&E's Northern San Joaquin 230 kV Transmission Project / A. 23-09-001

Dear Mr. Sanchez:

The California Farm Bureau Federation ("Farm Bureau")¹ submits these comments in response to the lead agency review under the California Environmental Quality Act (CEQA) by the CPUC regarding an Environmental Impact Report (EIR) to conduct an objective analysis of the effects of the proposed Project in compliance with CEQA. These comments are intended to address the scoping process with a scoping period from January 10 through February 9, 2024,² and are responsive to the Proponent's Environmental Assessment (PEA).

Farm Bureau represents farmers and ranchers throughout California, including members in San Joaquin county, who would be directly impacted by the Project based on the proposed scope. Farm Bureau presents its comments as augmentation to the comment letters which have been submitted by members of the community.

¹ The California Farm Bureau Federation is California's largest farm organization with approximately 26,000 agricultural and associate members in 54 county Farm Bureaus. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. Farm Bureau also aims to improve the ability of individuals engaged in production agriculture to utilize California's resources to produce food and fiber in the most profitable, efficient, and responsible manner possible guaranteeing our nation a domestic food supply. San Joaquin County Farm Bureau and its members have provided input, that is reflected in these comments.

² <https://ia.cpuc.ca.gov/environment/info/ascent/NSJTP/index.html> for timeline requirements for comments.

Farm Bureau recognizes and generally supports the need for appropriate energy infrastructure to assure consistent, reliable supplies of power. That recognition, however, does not translate into an assumption that every project proffered meets appropriate need tests without question. The Project, in fact, raises many questions and concerns, which should be examined both in the context of statewide resources and opportunities, as well as the implications to the local community where the Project will be located. It is incumbent upon the Project proponents to scrutinize all available options to obtain the needed capacity in light of the information it has and will receive about the effects of the Project as proposed. Set forth within these comments are issues, concerns and opportunities, which emphasize a broader review than that which PG&E conducted in minimizing impacts on many agricultural resources.

With the recommendations regarding how to better configure the Project our observation is that if they are adopted it would expedite the completion of the Project and minimize impacts to the community. Had PG&E spent more time working with the community to identify how to address impacts, the solutions could have already been reflected in the Project documents.

I. The Project Should Include the Perspective of the Impacted Communities From the Outset

It is necessary and relevant to consider the long-term economic and operational impacts to those residents forced to sustain the Project, in this instance the predominately agricultural landowners in San Joaquin county. The Project area to be studied and evaluated includes many, many small businesses comprised of farming operations. Those operations and the supporting services that depend upon them would be directly and permanently negatively affected by the construction and installation of new transmission lines, depending upon how the Project is ultimately comprised.

We recommend that this opportunity for reviewing the Project impacts seriously analyze the comments received by local community residents who are far more familiar with the area to be built out. Already we are aware that substantive and technical proposals have been made at the Public Scoping Hearing held on January 30, 2024, that will also be provided in written comments and are outlined below as well. Unfortunately, PG&E seemed to take an easy approach to connecting the dots to achieve what it has deemed to be the Project goals. That means that it is up to the CEQA process to overcome the deficiencies in what has been presented to date and there are multiple avenues to build out the Project in a manner that better respects the existing and potential viability of the agricultural businesses in its path.

The challenge of building the Project in an established agricultural community will be overcoming the important values that have been developed. With about 40% of the state's premium grapes grown in Lodi, the viticultural area is touted as the "winegrape capital of the world." Lodi growers produce more than \$450 million in winegrapes annually. These and other crops grown in the area are very high value and every effort should be made

to minimize effects on acreage. Although reducing permanent footprints on such areas will reduce the overall cost of the Project, because less remuneration will have to be paid, more importantly such reductions will benefit the community.

Agricultural landowners sustain much energy infrastructure on their property that serves the communities far and wide. In asking or in many cases forcing them to provide for such infrastructure, it is expected that every effort will be made to ameliorate the Project's effects.

II. Long-Term Impacts of Future Transmission Lines Can Be Understood from Effects of Existing Lines

Agricultural lands sustain vast amounts of utility service infrastructure. Agricultural landowners and operators have learned what to expect from living with that infrastructure on a daily basis. Education about the mandates associated with the operation and maintenance of the infrastructure, and limitations on the surrounding land, has been decades in the making. Landowners know that the burdens associated with managing land around the lines will continue to grow, and that the flexibility of operating around and under the lines will be more limited over the course of time. Assessment of impacts and appropriate treatments to impacts on agricultural lands based on the conditions which currently exist would be a severely inadequate measure. Agriculture must be able to adapt crops and management practices to remain viable. The project is happening at a time when farmers are having to make hard decisions about their futures. A lot of growers right now, just as markets change, are looking at pulling out a vineyard and determining what alternative crops they could grow. The overhead lines limit their ability to plant alternative crops such as trees.

Vegetation management around transmission lines provides an important example of the challenges faced by agricultural landowners. The trend over the years has been for utilities to ask for ever increasing clearances between trees and lines. The key variability in trimming requirements has been what the utility mandates at time of trim, rather than the clearance that must be maintained. It is recognized that new and different requirements established by the North American Electric Reliability Corporation impact how the utilities administer their programs. Whatever the causes, the fact remains the rules and requirements associated with sustaining the infrastructure on the property changes, sometimes without regard to the commitments made when the infrastructure was installed. In addition, the height and operation of mechanical grape harvesting equipment will have to be considered.

Agricultural landowners must be able to adjust to changing economic conditions by being able to plant appropriate crops on their land; permanent infrastructure severely constrains that ability unless appropriate planning and placement of the lines is conducted.

III. Significant Impacts to Crops Must Be Accounted For

1. Disruption of Soil During Construction

The Project will subject various levels of high-quality soils in the construction area to disruption. There is a significant risk that soils cannot be properly restored to the current status that signifies it as capable of high-quality production. Such concern is especially true of the operations in the Project area, since the farms have small acreage and depend on high value returns to sustain their operations. There is a possibility permanent impacts could be sustained long after construction and remediation. The extensive description of the construction activities highlights the long-term effects of changes to soils in the limited area.³

2. Dust Emission Impacts to Crops

Dust control is an issue not only as an air quality concern but as a pest control issue in orchards, vineyards, and other crops. Uncontrolled dust results in increased use of pesticides, because dust acts as a carrier for pests and diseases. In organic operations extensive use of approved materials is needed and water is used to wash the leaves of the crops. Dust is not only a concern during construction, but also as a result of vehicle access in the right of way for maintenance. Insufficient attention is given to the impacts to crops from dust during and after construction.⁴

Dusty conditions and their severity depend on the soil type, speed of vehicles using adjacent roads and the frequency of watering the dirt roads. Reduction of the speed of vehicles is the most cost-effective action, especially during drought conditions when water is in short supply. Where private ranch roads are used as access roads it will be nearly impossible to monitor the speed of the traffic or who uses the roads.

Discussion of methods to reduce dust needs to take into account the impact to crops and the related cultural practices, whether treatment is a suppressant, additives or vegetation. Agricultural operations are subject to some very strict regulations regarding chemical use. Materials appropriate for use in one context may not be appropriate near food production. Vegetation as a suppressant, unless properly managed, can create ancillary problems to crop production, as it may propagate weed problems for the operation.

The types of crops grown in the Project area are highly specialized and carefully managed. Thoughtful review of any changes to the area from a construction project is required in reviewing impacts. It can't be assumed that what works to maintain dust for air quality will work for neighboring crops.

³ PEA, page 3-42

⁴ PEA, page 3-73

Limiting impacts to crops from dust will depend on who and how access roads are used. It is not possible to monitor traffic on additional access roads. Although in some cases gates would be installed, much agricultural land is not fenced. For example, fences are not a common sight in orchards. The alternatives that create new easements and access roads also create greater impacts to crops.

3. Compatibility of Agricultural Activities With the Line is Limited

It should be taken into account that the placement of a line in areas that can support orchards will constrain future opportunities, as well as affect current operations. Constraints for vegetation management make vulnerable orchard crops and machine harvested grapes in the potential ROW. Transmission lines create greater impacts to these crops because of the requirements for maintaining vegetation clearances around the lines. With the changes over the years to vegetation management requirements, it cannot be assumed that the authorization for planting of any particular tree crop will continue for a defined period. The limitations imposed on landowners from such regulations should be understood and taken into account in assessing the impacts from the line and how to properly route it. The extensive limitations to permanent crops, especially orchards, do not bode well for landowners in the Project path.⁵

CFBF has been engaged for decades with utilities to find workable solutions to the requirements established by the CPUC and NERC for ensuring vegetation does not affect the transmission system. The trend over the years has been for the utilities to ask for ever increasing clearances between trees and lines. The key variability in trimming requirements is what the utilities mandate at time of trim rather than the clearance that must be maintained. Utilities have also been stricter about conducting the trimming under their direction, in contrast with periods when landowners did much of the pruning themselves. New requirements authorized by the North American Electric Reliability Corporation establish standards and penalties and also created vegetation management standards with which the utilities must comply.

Although the planning document suggests that ongoing vegetation management should not be required around the lines, the CPUC's standards for vegetation management as set forth in General Order 95 anticipate ongoing trimming under and around the lines. That practice has existed and continues to be in place, because PG&E is provided authorized revenues to conduct those activities. However, the most expeditious solution to prevent conflicts with current and future orchards is to site the lines so that agricultural parcels can be avoided.

⁵ PEA, page 3-54

4. Water Availability and Quality are Important Factors in the Sustainability of Crops

The categories of Farmland defined by the Department of Conservation⁶ are listed on its website and can be viewed on the link below. Key to the categories of Farmland which are capable of supporting the widest variety of crops is water availability and as a corollary water quality. Irrigation of Farmland will be significantly impacted on certain properties, either through the disruption of irrigation systems or the need to replace existing wells that are in too close of proximity to the proposed lines. The feasibility of replacing and relocating wells may not only be costly, but infeasible to replicate existing water availability and quality. The PEA addresses existing wells⁷, but provides an uneducated conclusion about the impacts between wells and lines, not taking into account the limitations that well servicing companies will contend with in addressing maintenance requirements.

If wells must be replaced in any of the proposed routes, there will be significant impacts to agricultural resources. Replacement of a well and water availability is not simply a matter of moving the source from one location to another. Significant analysis is required to assure that any new well would have comparable water resources. Because many of the parcels impacted by the Project are limited in acreage, so too are the options for locating a new well site.

5. Effects From the New Lines on Aerial Spraying Creates a Hazard and Affects the Sustainability of Farmland

Cultural practices of agriculture in San Joaquin County are dependent upon aerial application of materials to maintain the viability of the crop. Measures to assure the safety of the pilots for any new lines is important, but cropland subjected to new lines may be compromised as well. Because crops such as vineyards and orchards may require aerial application of products to protect crops, restrictive placement of lines may prevent applicators from being able to provide that much needed protection. In many instances aerial application will not be possible, because flight patterns that avoid the lines cannot be identified.

IV. San Joaquin County Agricultural Resources are Irreplaceable

As a finite resource and the backbone of every farming operation, agricultural land is carefully guarded. For environmental review purposes under CEQA, the categories of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land constitute 'agricultural land' (Public Resources Code

⁶ <https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx>

⁷ See PEA at page 3-30.

Section 21060.1).⁸ However, it is the interrelationship of all types of agricultural resources in the counties, which enable the supporting businesses and activities to thrive.

Any decision to remove the significant amounts of highly productive agricultural land as contemplated from the Project must be subjected to the strictest scrutiny. It is evident that the Project proponents fully assessed neither the financial impacts to the communities nor the long-term operational impacts to the agricultural resources. Not only do such resources provide valued food and fiber production, they are also invaluable resources for wildlife. If the proponents are truly committed to good stewardship, they should take a step back and treat the agricultural lands as an important piece of the equation and not a mere afterthought.

V. Options Other Than New Lines on Agricultural Land Should be Explored

During the scoping meeting held on January 30, 2024, a number of parties mentioned the option of undergrounding a portion of the line. The most expeditious area for undergrounding that would significantly minimize impacts to agricultural land is on Kettleman Lane. We encourage this process to investigate and consider that option, since it is an existing public use. Although undergrounding is more expensive, which fact will be raised at some point, it may be comparable to the other alternatives when land acquisition and long term impacts to the community are weighed.

Another important alternative that should be pursued is the subject of a recent analysis by the Energy Institute at Haas, University of California at Berkeley, **Accelerating Transmission Expansion by Using Advanced Conductors in Existing Right-of-Way**.⁹ They found that large-scale reconductoring with advanced composite-core conductors can cost-effectively double transmission capacity within existing right-of-way (ROW), with limited additional permitting.

VI. Conclusion

The California Farm Bureau Federation appreciates your consideration of the concerns and issues raised by the agricultural community in San Joaquin county. Many landowners in the Project area know first-hand that placement of a high voltage line on productive land forever changes the owner's ability to manage the resources. Because

⁸ <https://www.conservation.ca.gov/dlrp/finmp/Pages/Important-Farmland-Categories.aspx>

⁹ <https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Fberkeley.us13.list-manage.com%2Ftrack%2Fclick%3Fu%3Ded42abc90348afd39994b0fbb%26id%3Db7003df12a%26e%3Db0b8a993a7&data=05%7C02%7Ckmills%40cfbf.com%7C9b133f0c28b24e58a28108dc243a5308%7C8213ac7c9da54f9b9c40e0372e5a7659%7C0%7C1%7C638425080208525110%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=R%2FXNWvpdWn8Xlpb%2FyDysJ3%2FndmCO1YLu9a2KCQbvWJA%3D&reserved=0>

Mr. Boris Sanchez
February 9, 2024
Page 8

impacted landowners are quite knowledgeable about the long-term impacts of the lines, the lack of effort by PG&E to engage with the community was not only disappointing but did not facilitate effective solutions. In our experience, project proponents are prone to complain about delays for building out infrastructure; however, if more than required outreach to the affected community were conducted better planning would be accomplished with more expeditious completion of the project.

Decisions will constantly be gauged by how a large, dangerous piece of infrastructure on the property will impact the business operations. Until better methods are developed for agricultural crops and operations to co-exist there will be significant questions about long-term implications of new transmission lines on agricultural lands. We hope and expect that other options are fully explored, including substantive consideration to the recommendations contained in this letter and those that members of the community have provided.

Respectfully submitted,



Karen Norene Mills
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cc: NSJTP@ascent.inc

Andrew Genasci, Executive Director, San Joaquin Farm Bureau Federation

From: katiekoepplin@gmail.com
To: [NSJTP](#)
Subject: CPUC Preparation and Scoping Project - # A.23-09-001 PG&E Northern San Joaquin 230kV Transmission Project
Date: Friday, February 9, 2024 7:01:10 AM

February 7, 2024

To Whom it May Concern,

I am reaching out as a concerned homeowner explaining our concerns and frustrations with the proposed High Tension power lines project number A.23-09-001 (**Northern San Joaquin 230kV Transmission Project**) projected to impact our area and our property east of Lodi, CA.

We are deeply concerned. Our residence will be within the 300' of these lines and possibly within the "fall zone". Our second home across Curry Ave from our main residence will be right at the 300' distance from the lines. We will probably lose half of our cherry orchard and have clear site of the lines and poles from both homesites to the north.

Much of the frustrating part is that we were not aware of any of this happening until about 4 years ago, thus only able to attend one of the community meetings that were held in Lockeford, CA. I was lucky that a neighbor one street over actually called and asked if we knew about it and that there was going to be a meeting for all of us in Lockeford. By that point PG&E had already made a decision to abandon that original route that was going to come from the Spanos Park area near I-5 towards Lodi. We were told by PG&E that those homeowners that were in the path already fought hard against it. Low and behold it was no longer in the running. But we were not told that until this fall. At a recent meeting PG&E had with some of us in Lodi, CA at the Grape Festival Grounds (after they turned all of this over to the CPUC) a rep from PG&E explained that they went through a rigorous process of making sure everyone that might be impacted was sent a notice. Many were dumbfounded since we had not gotten a notice. Wouldn't something of this magnitude deserve to be sent certified or registered mail to ensure that all of us in the direct path of the lines were contacted and notified? Just standing up and saying "Well, we thought we had it all covered" does not really help us much after the fact. And then had the nerve to say "well we should have been at meeting years back so we could speak up". Really?

At the only meeting I was able to go to in Lockeford sponsored by PG&E the reps didn't have any information that anybody was interested in, nor had answers to our questions or any timelines. What was the point of those meetings? We were hoping for a voice back when the decisions were being made. They said to keep checking the website and we kept checking the website for more info and nothing was ever posted for us to see, even though PG&E now states they kept us informed the entire time. They did not. Then out of the blue a couple of months ago we get a flyer stapled to a power pole down the street from our home and about 5 days later get the same info in the mail basically stating "congrats, your route was picked!"

We did not buy our home because it was located next to high tension power lines. We chose this property because of the location near town and yet far enough to enjoy the peaceful country living of vineyards and orchards. I don't understand why we have to suffer consequences of poor planning and failed policies because the State of California can't manage this State in a way that makes logical sense. You don't keep expanding communities/cities with more homes and businesses if you can't provide adequate needed services such as electricity and water. We know these are issues that have affected all of California the past few years with rate hikes and water rationing. All of these new

subdivisions and shopping centers were approved and the City of Lodi didn't even have adequate facilities to support all of the new projects. And more are coming! How does that stuff get approved? Maybe they should have updated the electrical power grid BEFORE they approved all these new projects. Were any of these costs of expanding the power grid passed along to these developers like they do with other issues the city doesn't want to or are unable to pay for? And if so, where did that money go? PG&E did admit that the bulk of the need for additional electricity (70%) is for the City of Lodi. So why do City issues, and poor planning, impact those of us that are not part of the City of Lodi?

Some of the information given to us recently indicates that this has been in the works since 2000, how come we never heard about it? Nobody told us? Maybe we could have sold and moved before any of this ever happened. At least we would have had an option. Now how can we move? Who would buy this place? The option to sell is no longer an option. Nobody wants to live next to High-Tension power lines. I am a Real Estate industry and know for a fact some Lenders won't even loan on a property that would be this close to power lines. Property values plummet with high tension power lines. So now we have to suffer the consequences of these poor decisions by people that these high-tension power lines will never affect.

We understand that PG&E needs to update the grid and try to stay on top of the growing communities. But there has to be a better way. We all know that burying these lines is an option. Yes, the cost is very high. But the cost to us is already very high. We would rather pay more per month for electricity and have a property we can live in and/or sell if necessary than have these lines installed and not be able to sell our place if needed one day. Not to mention that they are not healthy to be around and they make noise. We all know that is true but PG&E will never admit that. Ever!! Will PG&E be willing to buy our properties at current market value? And I do not mean just the portion they need to use. I mean pay what our home is worth before the lines go in? Very sad since we do not want to leave this area. I have talked with friends who are adjacent to high voltage lines and they have nothing positive to say.

Why shouldn't everyone share the costs rather than just those of us that this affects? I mean we are all already paying the cost of old systems and all the fires that were started because of inadequate/dated electrical equipment. We are not even in a fire zone and we suffer those consequences. At least that is what we are being told. PG&E rates are super high and they still can't get a handle on any of this. All those billions in fines should have gone to upgrading the systems and not into attorneys' pockets. We are tired of PG&E and the State getting a pass on this stuff. Tired of the poor decisions/planning by the State and poor decisions by our representatives.

We take pride in our rural location and this is a very productive agricultural area of high producing vineyards, almonds, cherries and such. Lodi is considered a destination in the wine community and who wants to have to look at and/or experience all these power lines going right through the heart of rural East Lodi? There are other options that should be explored. I know this is not PG&E's or the CPUC's first rodeo with having to deal with unhappy homeowners. But we are not going down without a fight. We love living where we live and do not feel that it is fair to have someone come along and just decide the fate of our properties in order to take care of inadequate infrastructure/services that the State and/or City of Lodi should have seen coming 30 years ago.

Please consider another option. We realize that you are wanting suggestions rather than complaints. We just never had an opportunity to relay our feelings until this point. We feel that the fairest way to handle would be to go up a major street such as Victor Rd, Kettleman Lane, Harney Lane etc. or save everyone from complaining and go the underground route. We were told they did this in San Francisco so the skyline wasn't ruined. So obviously it can be done. The cost is extremely expensive, however the loss in value to our properties is way more than the monthly bill increase that should be shared by everyone in Lodi that is going to benefit from this.

Thank you for taking the time to read our concerns.

Katie and Gary Koeplin

(209) 327-5964

The following are the parcels we own that will be impacted by the project listed above:

14541 N. Curry Ave. Lodi, CA - APN: 061-131-02

14501 N. Curry Ave. Lodi, CA - APN: 061-131-01

14550 N. Curry Ave. Lodi, CA - APN: 061-132-30

From: [Kurt Kautz](#)
To: [NSJTP](#)
Subject: FW: Scanner
Date: Tuesday, January 30, 2024 4:22:38 PM
Attachments:

Per the directions at today's zoom meeting regarding the proposed Northern San Joaquin 230KV Transmission project, I am resending a letter I mailed to the CPUC Docket office. They had requested comments to be submitted in writing only and sent via regular mail. In addition to the comments included in the attached letter, I have been told that any pumps and wells located close to the proposed line would need to be moved. My pump and well is directly in the path of the proposed line. My parcel sizes are shown on the attached information, the 40 acre parcel has the ability to be split into four 10 acre parcels, making 4 additional home sites. Home site parcels are generally valued at 5-9 times the value of straight AG property. It really does not make sense to run this line through so many small parcels on the entire route. These small parcels are often the only land holdings, usually with their home, of the local residents. Kurt Kautz

-----Original Message-----

From: Debbie Razo <drazo@kautzfarms.com>
Sent: Tuesday, January 30, 2024 4:10 PM
To: Kurt Kautz <kkautz@kautzfarms.com>
Subject: Scanner

Will this work?



KAUTZ FARMS

Diversified Farming

LETTER OF PROTEST OF APP# 23-09-001
Northern San Joaquin 230KV Transmission project

To California Public Utilities Comm Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, Ca 94102

With Copy too.

David Kraska, Law Department P G & E
300 Lakeside Drive
Oakland, CA. 94612

I am protesting the proposed route of the proposed Northern San Joaquin 230KV Transmission project. Specifically, the proposed route is west of Vintage Road in Lodi to west of Curry Road in Lodi.

The proposed route cuts directly across my parcels of grapes and almonds. These are all small parcels with a much-increased value for homesites due to their small size. The transmission lines will destroy the value of the parcels for homesites. This would constitute a taking of private property value and requires just compensation for the landowner.

It would seem much more logical to run this proposed line, along an existing public roadway where there is already power lines. Most properties would be more valuable without these lines going across them, so that would also be a taking of private property.

The specific APNs which I own that the proposed route would cross are as follows. Parcel Map is included.

- 061-132-08 40 acres
- 061-132-10 7.2 acres
- 061-132-41 4.2 acres
- 061-132-31 13.17 acres
- 061-132-32 20 acres

If the route crosses these parcels, I expect to be fully compensated for the loss of value. In addition, at times we apply pesticides via air. These lines would restrict our ability to do that.

Kurt Kautz
5490 Bear Creek Road
Lodi, CA, 95240
209-334-4786

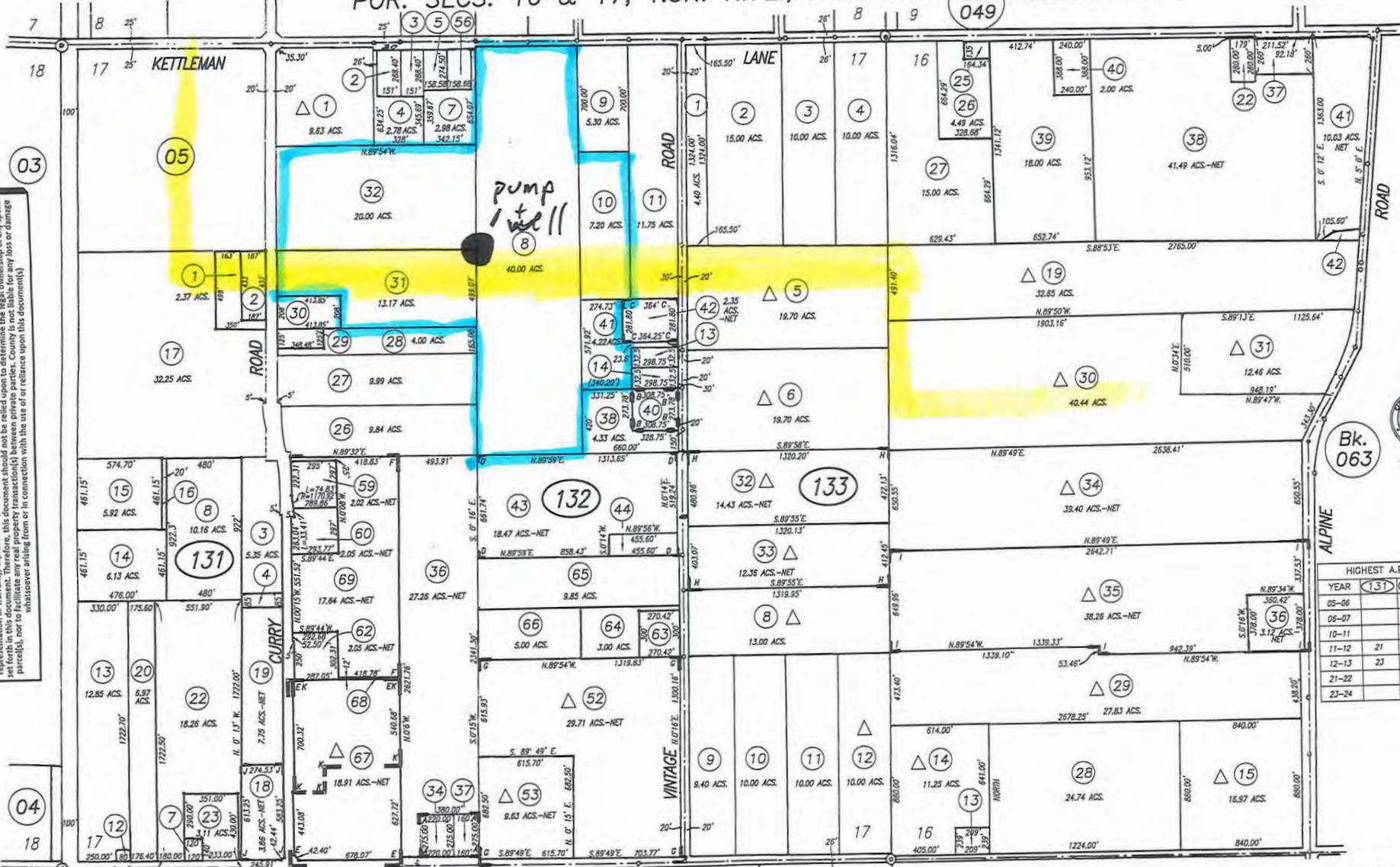
POR. SECS. 16 & 17, T.3N. R.7E., M.D.B.&M.

Bk. 049

THIS MAP IS FOR ASSESSMENT USE ONLY

061-13

DISCLAIMER
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HIGHEST A.P.N. USED	131	132	133
05-06	84		
06-07	66		
10-11			40
11-12	21		
12-13	23		
21-22			42
23-24			69

- HARNEY
- D-P. M. BK. 18 - PG. 050
 - C-R. S. BK. 30 - PG. 182
 - B-P. M. BK. 04 - PG. 182
 - A-R. S. BK. 26 - PG. 043
 - H-P. M. BK. 20 - PG. 048
 - C-R. S. BK. 32 - PG. 167
 - F-P. M. BK. 19 - PG. 041
 - E-P. M. BK. 18 - PG. 073

- LANE
- K-P. M. BK. 22 - PG. 051
 - J-P. M. BK. 22 - PG. 036
 - I-P. M. BK. 20 - PG. 089

LANE 20 21

△-Williamson Act Parcels
NOTE: Assessor's Parcel Numbers Shown in Circles.
Assessor's Block Numbers Shown in Ellipses.

Assessor's Map Bk.061 Pg.13
County of San Joaquin, Calif.

proposed Route
- pump + well Location
My properties Boundaries

NATIVE AMERICAN HERITAGE COMMISSION

January 13, 2024

Boris Sanchez
California Public Utilities Commission
455 Capitol Mall, Suite 300
Sacramento, CA 95814

Re: 2024010207, Northern San Joaquin 230 KV Transmission Project, San Joaquin County

Dear Mr. Sanchez:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

[AB 52](#)



CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
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Yokayo Pomo, Yuki,
Nomlaki

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COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation**: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation**. There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality**: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation**: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse

From: manroopshergill1@yahoo.com
To: [NSJTP](#)
Cc: [Sanchez, Boris](#)
Subject: PG& E NSJ 230 KV project
Date: Friday, February 9, 2024 1:50:25 PM

Hello,

We have 15 Acres at 15155 N Curry Ave, Lodi, Ca 95240. Proposed project yellow line on the map goes through our field to connect to Lodi Industrial substation. We are DEFINITELY AGAINST the proposed route. Our family would like PG&E to take power lines underground or find another least impacted route. We are a small farmer and our livelihood is on farming. Having a pole in field with wires going overhead will really affect us.

1. Reduce our property value
2. 15 acres of productive land will be reduced in size if pole is put in our field.
3. Working in field will exposed my husband, son and workers to electromagnetic waves.
4. It will be hard to farm around electric pole
5. Aesthetic of our field will change with pole and overhead wires.

We would request California Public Utilities commission to look into this project very closely and make PG&E explore all other options.

Can you please acknowledge that you received my e-mail.

Thank you
Paul and Manroop Shergill

Sent from my iPhone
Manroop Shergill



Central Valley Regional Water Quality Control Board

9 February 2024

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

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, NORTHERN SAN JOAQUIN 230 KILOVOLT (KV) TRANSMISSION PROJECT, SCH#2024010207, SAN JOAQUIN COUNTY

Pursuant to the State Clearinghouse's 10 January 2024 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Northern San Joaquin 230 Kilovolt (kV) Transmission Project, located in San Joaquin County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as

required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention

Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more

information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

Northern San Joaquin 230
Kilovolt (kV) Transmission Project
San Joaquin County

- 5 -

9 February 2024

If you have questions regarding these comments, please contact me at (916) 464-4684
or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

February 15, 2024

Boris Sanchez
California Public Utilities Commission
Energy Division - Infrastructure Permitting & CEQA
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

Project: Notice of Preparation for Northern San Joaquin 230 kV Transmission Project

District CEQA Reference No: 20240058

Dear Mr. Sanchez:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the Notice of Preparation for an Environmental Impact Report (EIR) from the California Public Utilities Commission (CPUC) for the Northern San Joaquin 230 kV Transmission Project proposed by PG&E and Lodi Electric Utility. Per the NOP, the project consists of the construction and operation of a new 230 kV transmission system with approximately 10.6 miles of new double-circuit 230 kV transmission lines, an expanded substation, a modified substation, a new substation, a new switching station, reconfiguration of four existing 60 kV lines, relocation or extension of two existing 12 kV lines, and upgrades at four remote-end substations and one repeater station (Project). The Project is located primarily in northeastern San Joaquin County and in the City of Lodi.

The District offers the following comments at this time regarding the portion of the Project:

1) Project Related Emissions

At the federal level under the National Ambient Air Quality Standards (NAAQS), the District is designated as extreme nonattainment for the 8-hour ozone standards and serious nonattainment for the particulate matter less than 2.5 microns in size (PM_{2.5}) standards. At the state level under California Ambient Air Quality Standards (CAAQS), the District is designated as nonattainment for the 8-hour ozone, PM₁₀, and PM_{2.5} standards.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

The District's initial review of the Project concludes that emissions resulting from construction of the Project may exceed any of the following significance thresholds as identified in the District's Guidance for Assessing and Mitigating Air Quality Impacts: <https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf>. The District recommends that a more detailed preliminary review of the Project be conducted for the Project's construction and operational emissions.

1a) Construction Emissions

The District recommends, to reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment.

2) Health Risk Screening/Assessment

The CPUC should evaluate the risk associated with the Project for sensitive receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) in the area and mitigate any potentially significant risk to help limit exposure of sensitive receptors to emissions.

To determine potential health impacts on surrounding receptors (residences, businesses, hospitals, day-care facilities, health care facilities, etc.) a Prioritization and/or a Health Risk Assessment (HRA) should be performed for the Project. These health risk determinations should quantify and characterize potential Toxic Air Contaminants (TACs) identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health.

Health risk analyses should include all potential air emissions from the project, which include emissions from construction of the project, including multi-year construction, as well as ongoing operational activities of the project. Note, two common sources of TACs can be attributed to diesel exhaust emitted from heavy-duty off-road earth moving equipment during construction, and from ongoing operation of heavy-duty on-road trucks.

Prioritization (Screening Health Risk Assessment):

A "Prioritization" is the recommended method for a conservative screening-level health risk assessment. The Prioritization should be performed using the California Air Pollution Control Officers Association's (CAPCOA) methodology. Please contact the District for assistance with performing a Prioritization analysis.

The District recommends that a more refined analysis, in the form of an HRA, be performed for any project resulting in a Prioritization score of 10 or greater. This is because the prioritization results are a conservative health risk representation, while the detailed HRA provides a more accurate health risk evaluation.

Health Risk Assessment:

Prior to performing an HRA, it is strongly recommended that land use agencies/ project proponents develop and submit for District review a health risk modeling protocol that outlines the sources and methodologies that will be used to perform the HRA.

A development project would be considered to have a potentially significant health risk if the HRA demonstrates that the health impacts would exceed the District's established risk thresholds, which can be found here:

<https://ww2.valleyair.org/permitting/ceqa/>.

A project with a significant health risk would trigger all feasible mitigation measures. The District strongly recommends that development projects that result in a significant health risk not be approved by the land use agency.

The District is available to review HRA protocols and analyses. For HRA submittals please provide the following information electronically to the District for review:

- HRA (AERMOD) modeling files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodologies.

For assistance, please contact the District's Technical Services Department by:

- E-Mailing inquiries to: hramodeler@valleyair.org
- Calling (559) 230-5900

Recommended Measure: Development projects resulting in TAC emissions should be located an adequate distance from residential areas and other sensitive receptors to prevent the creation of a significant health risk in accordance to CARB's Air Quality and Land Use Handbook: A Community Health Perspective located at <https://ww2.arb.ca.gov/our-work/programs/resource-center/strategy-development/land-use-resources>.

3) Ambient Air Quality Analysis

An Ambient Air Quality Analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of State or National Ambient Air Quality Standards. The District recommends an AAQA be performed for the Project if emissions exceed 100 pounds per day of any pollutant.

An acceptable analysis would include emissions from both project-specific permitted and non-permitted equipment and activities. The District recommends consultation

with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance, is available online at the District's website:
<https://ww2.valleyair.org/permitting/ceqa/>.

4) Voluntary Emission Reduction Agreement

Criteria pollutant emissions may result in emissions exceeding the District's significance thresholds, potentially resulting in a significant impact on air quality. When a project is expected to have a significant impact, the District recommends the EIR also include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for this Project.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-related impacts on air quality can be mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of agricultural equipment with the latest generation technologies.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-related emissions have been mitigated. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the environmental document includes an assessment of the feasibility of implementing a VERA.

5) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the

District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: <https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations>. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (209) 557-6446.

5a) District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 (Permits Required) requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 (New and Modified Stationary Source Review) requires that new and modified stationary sources of emissions mitigate their emissions using Best Available Control Technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits. Prior to construction, the Project proponent should submit to the District an application for an ATC. For further information or assistance, the project proponent may contact the District's SBA Office at (209) 557-6446.

5b) District Rule 9510 - Indirect Source Review (ISR)

The Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 9,000 square feet of space.

The purpose of District Rule 9510 is to reduce the growth in both NO_x and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NO_x and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission

reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA application for this Project. Please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510 so that proper mitigation and clean air design under ISR can be incorporated into the Project's design. One AIA application should be submitted for the entire Project.

Information about how to comply with District Rule 9510 can be found online at: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview>

The AIA application form can be found online at: <https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/>

District staff is available to provide assistance and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

5c) District Regulation VIII (Fugitive PM10 Prohibitions)

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities*.

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.

The application for both the Construction Notification and Dust Control Plan can be found online at: <https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx>

Information about District Regulation VIII can be found online at:
<https://ww2.valleyair.org/dustcontrol>

5d) Other District Rules and Regulations

The Project may also be subject to the following District rules: Rule 4102 (Nuisance) and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

6) District Comment Letter

The District recommends that a copy of the District's comments be provided to the Project proponent.

If you have any questions or require further information, please contact Michael Corder by e-mail at Michael.Corder@valleyair.org or by phone at (559) 230-5818.

Sincerely,

Brian Clements
Director of Permit Services



For: Mark Montelongo
Program Manager

From: [Teresa McDonald](#)
To: [NSJTP](#)
Cc: [Jeremy Ballard](#)
Subject: Subject: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC SCOPING MEETING FOR THE NORTHERN SAN JOAQUIN 230 KV TRANSMISSION PROJECT
Date: Friday, January 12, 2024 11:25:26 AM
Attachments: [01112024_California Public Utilities Commissioif .pdf](#)

Good morning,

Stanislaus County Planning has reviewed the subject referral and has no comment on the project at this time.

Thank You

Teresa McDonald

Associate Planner

From: liamcvicker@gmail.com
To: [Sanchez, Boris](#); [NSJTP](#)
Cc: "[Shannon Oxford](#)"; "[Andi Kutlik](#)"; BTranch10@gmail.com
Subject: PG&E --NORTHERN SAN JOAQUIN TRANSMISSION LINES
Date: Friday, February 9, 2024 1:29:47 PM

February 9, 2024

Boris Sanchez, CPUC
c/o Ascent, Attn: Heather Blair
455 Capitol Mall, Suite 300
Sacramento, CA 95814

PG&E application number A-23-09-001

Dear Mr. Sanchez, et al.,

Thank you for this chance to comment on the Northern San Joaquin 230 kV Transmission Lines Project.

While we, my husband and I understand that some things are a necessity for the future, we find that if there is no secrecy, and total transparency with not just us but all fellow ranchers and farmers involved in a “project”, the timing and completion of the project will go much smoother and will not disrupt all our lives.

Please respond when you receive my email.

I do have questions that still an answer, please see below.

Questions:

1. **Who and why is ascent.inc involved in this Northern San Joaquin Project and why are we having to email them?**
2. **How will CPUC and PG&E notify us, and be informed of any future decisions being made, since our lives and livelihood are being affected and disrupted? Such as, Right-of-ways, Easements, and Construction of an access road to our property. How will we be properly notified of when our property will be used for Construction Access, and the property to be used for Staging Access?**
3. **Will we and other San Joaquin, (S.J.) County ranchers that are being affected by these new transmission lines be compensated for the loss of their income and any of the property acquired by PG&E?**
4. **Will we, S.J. ranchers and farmers be compensated for the portion of their property that will be acquired as a “Staging Area”?**
5. **If access is needed for construction who will pay for the insurance in case one of the worker’s or crews becomes injured while entering or working on the property or exiting?**
6. **Since there is no public access to our property and the only access is though our existing driveway, how does PG&E and any other person(s) or agency or business**

propose to get to the property that has been designated as land they will need to acquire for these transmission lines?

7. Who is paying for there to be an access road to be built on the property, when there is no access from the main road? Please understand we will need a minimum of 30 days advanced notice to prepare for access to be built for to our property.
8. Who will pay for any damage done to the existing irrigation system and irrigation pipelines, or wells due to vehicle traffic while the crews and or Inspections that will have to be on our property?
9. Who will be responsible for any damage done to the existing fence lines that surround our property and any of the cross-fencing within the boundaries of the property, which may be damaged due to vehicle traffic?
10. Why are Contra Costa and Sacramento County's, and the town of Rio Oso, (Sutter County) deemed a part of this Northern San Joaquin 230kV Transmission Lines Project?
Why are other counties, and towns being "upgraded" on their communication lines or electrical lines within this project?
11. Will these other counties or towns pay for their own connection and usage of the power and electricity to be tied into these transmission lines?
12. Why are San Joaquin County citizens having an increase in their PG&E bills if these transmission lines are needed to increase the electrical output for the City of Lodi, Lockeford, Sacramento County, Contra Costa County, the town of Rio Oso, (which is in Sutter County) and surrounding areas?
13. When and if any portion of my property/land becomes inaccessible and unusable because of PG&E power lines and the PG&E 230 Monopole structures or other PG&E Electrical Towers, who will be responsible to maintain the insurance and taxes on that portion of the property that we can no longer use?

Please respond to this email when you receive it.

Thank you for your time.

Regards,

Will McVicker and Lia McVicker Home: 209-333-8406
15510 N. Jack Tone Rd.
Lodi, CA 95240

Will McVicker wmcvicke@gmail.com 209-481-1489
Lia McVicker liamcvicker@gmail.com 209-481-4034

Cc: Gayle Oxford, Andi Kutlic, Dan Bartlett, and Maria Tone-Bartlett.

Lia McVicker