

**Comment Set 4**

Nicolas Procos, CPUC  
 c/o Aspen Environmental Group  
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[atlanticdelmar@aspene.com](mailto:atlanticdelmar@aspene.com)

Dear sir,

This letter is to protest the proposed Atlantic-Del Mar Reinforcement Project. The Draft Mitigated Negative Declaration and Initial Study leaves out many factors which need to be considered, and minimizes others which are more significant than the reader is lead to believe. Although per section 21082.2 “the existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence in light of the whole record before the lead agency that the project may have a significant effect on the environment,” often public controversy is indicative that there is an environmental impact. In this case, that is so. Please review all the evidence and comments received before making a decision. There are feasible alternatives, which would substantially lessen the effects of this project.

**Aesthetics**

On page B-24 of the Draft Mitigated Negative Declaration and Initial Study (DMND), the report declares there is either no impact, or less than significant impact on each of the aesthetic checklist items. On number a) no indeed, the Rocklin area does not have a designated “scenic vista”.

Rocklin however, does have a proposed historic district, which will be visually impacted and Roseville has a woodland area, which also pertains to question b). On page B-25, the report states that, “Antelope Creek, woodlands, and the oak trees in the vicinity of the Proposed Project provide a scenic resource that beautifies the landscape.” The report then makes the conclusion that the power lines would not degrade the scenic impact. How is this conclusion made? The cities of Rocklin and Roseville have both enacted policies, which require all new services to be undergrounded. They have these written thresholds for aesthetics. Neither is the view of trees by enhanced by 75-110 foot power poles, nor are these significantly tall poles hidden from view by the shorter trees. The conclusion that the aesthetics will not be degraded seems to be a judgment with no basis, and in contrast to existing aesthetic thresholds.

The historic district, on which Rocklin has been working, will be significantly impacted by 75-110 foot, high voltage wires as well. Granted the poles are not on the property itself, but 75-110 foot poles are rather visible when looking out a window, walking out a door, or driving to an area. The proposed train depot, and old town Rocklin will have a significant visual impact. Rocklin has invested money into the project and has written plans and policies regarding its historic district. This area should be protected from visually inappropriate 75-110 foot pole. The reports conception of planting flowers around, or using a non-glare 75 foot poles will not mitigate the aesthetic impact.

The report also states that, “pursuant to CEQA, public views are eligible for protection and/or mitigation for project effects if there is demonstrable negative aesthetic

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impact. The impact is defined in part by the degree of contrast that the proposed facilities would have with the surrounding visual landscape.” Yes the landscape in the area is predominately the Union Pacific Rail Road (UPRR) corridor. It is somewhat wild and does have some distribution wires visible. The train corridor is acceptable to most of the residents and exciting to many others. A number of the residents are train enthusiasts and desire a location close to train tracks. That does not necessarily transfer to a desire to be near high voltage, tall, power towers. There are distribution wires in part of the area as well. Many of the residents have wanted those lines undergrounded as well. They however, are grandfathered in, because they existed before Rocklin’s undergrounding policy, or they are over an archeological site.

“With regard to the proposed power line, approximately 4 miles of 60kV overhead line would be constructed within the vicinity of a mixture of both urban and rural land uses, including residential developments, commercial developments, industrial developments, a historic district, and open space.” (p.B-26) The report continues by discounting the visual impact of all the poles and demonstrating such by including visual simulations (B-28 - B-37). These simulations are misleading, at best, in nature. The map (B-29) on which all the poles and simulations are based is at least 15 years old. This map does not indicate residential developments, which have existed for at least 13 to 14 years. How can the report categorically state it will not impact residences when the report does not even acknowledge the existence of several hundred, or more, homes? When questioned by the Judge Janet Econome at the prehearing conference to provide residential addresses for properties that were contiguous with the project, PG&E required two extensions of time, because there are close to 300 properties involved. This does not include all the residences and personal properties that are visually impacted, which is significantly greater. The report continues, “several residences along Willard Way in the residential development near Milepost 2.0 would have views of one or two of the proposed poles (pole numbers 16 and 17) and the conductor wires. Views of the proposed project would likely occur from the rear of the residences and they look over their backyard fences and depending on the observer’s view, the proposed lines may be partially back-dropped by commercial facilities along Pacific Street (PG&E, 2001a). (B-38) First of all, if the pole is behind their backyard, they are also going to see the 75-110 foot pole from the front yard not to mention driving up to their house. So will all the 200 plus other residents of that particular development. Secondly, the “commercial backdrop” is about 1/8 to 1/4 mile away. A 75-110 foot pole is not going to meld into a commercial building seen in the distance across an open field where rabbits play.

The visual simulations do not accurately reflect the visual character that would change. The simulation on B-33, Taylor Road looking north, is a case in point. This view minimizes the size of pole by the angle and distance and comparison to the huge poles used in Roseville. Also if this view is to demonstrate that the residences in the apartment complex, identified on B-26, as having a less than significant impact because of the backdrops, the simulation should be made from their perspective. If this were done, the poles would be significantly larger and more noticeable, and the wires would be shown hanging right above the garage units of the apartment complex, straight in front of the second story windows. The simulations fail to include a simulation of the higher density residential area, and focus solely on the open space and commercial area. This, in itself is misleading. The reports simulations likewise fail to simulate the poles near

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dangerous, or beautification areas. Additional, as an aside, if the views are to be taken from Pacific/Taylor Road, it should be noted that this road is part of the historic Lincoln Highway, which is one of the first roads, like Route 66 to cross our nation. Granted it is not a state scenic highway, but its historic value is of some significance and the views from this historic highway are of value to many. 75-110 foot high voltage power poles will not enhance its historic vistas. Also, since the simulations are from the road, has the DMND considered and notified the visual impact of the people that travel regularly upon that road. Was notice given in such a way as to reach those individuals who travel or live within viewing distance of the project?

**4-1**

Although "CEQA does not require technical perfection..., but rather adequacy, completeness and a good-faith effort at full disclosure," it does not appear that the report is adequate, complete or maybe not even made in good-faith as far as the visual impact of the project is concerned. The map is old, the simulations misleading, and the conclusions without basis. The report's "findings" that the visual impact is less than significant is not acceptable and further study, at a minimum, should be made.

**Hazards and Hazardous Materials**

The DMND delineates the "potentially contaminated sites in the project area" on page B-66 of the report. One site is not examined to the extent that it should be. That is site number 7 - Kinder Morgan Energy Partners at 6050 Pacific Street in Rocklin. The site is said to have "had historical releases of fuel hydrocarbons, including benzene, toluene, ethyl benzene, xylenes and methyl tertiary butyl ether (MTBE)." Why has this area had these releases? Well the answer is located right across the tracks from the exhibited site, the fuel tank farm. This tank farm in June of 1981 spilled 30,000 gallons of gasoline over the top of a storage tank. This spill led all the roads to be closed and the trains to stop for about 5 hours. A local state of emergency was declared. It was said "the spill was very similar to one which sparked an explosion and fire in Stockton a year ago that sent flames shooting more than 400 feet into the air". (Sacramento Bee 6/22/81 pgs A1 & A12). This facility has now increased in size, and carries jet fuel to the Air force bases of Beale CA and Fallon NV. This type of fuel burns with even more intensity.

**4-2**

The question then is, why is a 75-110 foot pole, for high voltage electricity is being placed at an unmarked railroad crossing within yards of this facility? In the first place, placing electrical wires that spark around jet fuel seems to be an idea lacking common sense. If a spill occurs, will the sparks from these wires set off a fire or explosion? How quickly can the electricity be shut down, once notified which also may take considerable time, so that a spark does not create a fire or explosion?

Secondly if, for whatever reason a pole should fall, it has a likelihood of landing in the tank farm, or downed wires may fall in the tank farm. Again the possible devastation that could occur is unimaginable. Explosion or fire, the results could be catastrophic. One possible reason for pole damage could be due to a train derailment or collision, something which did occur in that exact spot, crossing (750563W) in 1996. The train hit a truck which was crossing the tracks. At that site there are no crossing gates or alarms. The risk of human error is higher when there are no safety devices available. With a pole at that location, the risk of a driver not observing a train is even higher. Another possible reason for pole damage is an automobile accident. Several weeks ago, a van in Roseville careened into a pole, seriously damaging the pole and

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causing it to lean significantly. Could this type of accident also ignite fuel from the tanks? Winds, electrical storms, earthquakes and other acts of God may additionally damage a pole or break the wires. In these instances, electricity and jet fuel are a combination that could create a significant emergency. Is PG&E prepared for the casualty and resulting lawsuits? Since the tank farm was in the area first, it would seem the predominate fault would lie with PG&E for placing its poles and lines negligently by such a hazardous entity.

**4-2**

CEQA questions whether a project would “create a significant hazard to the public or the environment through reasonably foreseeable **upset and accident** conditions involving the release of hazardous materials into the environment?” (Appendix G) The answer to that question must be Yes. By itself the project may not be hazardous. But by placing the project right beside a jet fuel tank farm, reasonable foreseeable upset and accident potential exists that would be potentially catastrophic. The report’s indication that the project has a less than significant impact is completely unacceptable.

**Land Use / Planning**

On B-77 the report declares that it will have less than significant impact on b) “applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating and environmental effect.” The city of Rocklin has several policies on which it is requesting a hearing. The first is the historic district of Rocklin. It is still in planning and process, but work has begun and the city has a written policy. Another written policy is the policy of undergrounding utilities. These are written thresholds for land use. These policies should be considered. The project will have a significant impact on the historic district for both visual and land use justifications.

**4-3**

As a personal aside, it is also obvious, from the DMND report and CEQA, that people have little value to the process. Our land use for our own private property is never considered. How the project will impact the breeding of frogs, fowl or fauna is of more importance to the state of California and requires more mitigation than how each project will impact people. This is understandable if a project is running through an undeveloped area. However, when a project is run through an already developed community, it seems to have eminent domain. If the power lines exist before houses are built, individuals may choose or not choose to live near them. However, as in this case, the law does not seem to protect individuals that were in an area first. Their right to choose has been obliterated, and may not even be voiced. The power lines that will be crossing through this area will not even supply power to this area. The area already has sufficient power, and has not grown the degree that it requires significantly more power. The power will be used to bolster another area of Rocklin and Lincoln, which is growing significantly, and will continue to grow. An additional question for the power company, CPUC and our legislature if we must have eminent domain of power lines, why not run them along the corridors which are actually requiring them? In other words, move the project to the Stanford Ranch/ Lincoln area. Of course, there would be even more outcry, because there are more people in that area.

**4-4**

PG&E’s response is that undergrounding is more costly. They contend that all their customers have increased bills if lines are undergrounded. In some ways this is fair in that, the existing customers have already paid for undergrounding in San Francisco,

**4-5**

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Tahoe, and other areas where they are underground. However, another possibility if communities are growing and need more power, is that the growing communities should help fund the cost of providing that power. Roseville and Rocklin should float bonds to help pay to provide resources for the increase in citizens. The towns will be making additional funds on property taxes from the new citizens. Also, developers could be charged a fee to provide undergrounded services to their development. Then those requiring the new additional services would be helping to pay for the additional cost of the new services, and not just those who do not require the new services.

**4-5**

**Public Services**

Continuing on with the public services, the DMND proposes on page B-91 that the project will have less than significant impact on fire protection. The report supports this on page B-93 stating "under normal operating conditions, the proposed power line and proposed modification to the existing substation would not introduce any new fire hazards that would require an increase in fire protection. Therefore, no impact is anticipated." Fire, however, is not, normal operating conditions. It is an emergency situation where every second counts. CEQA defines emergency as "a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. "Emergency" includes such occurrences as **fire**, flood, earthquake, or the other soil or geological movements, as well as such occurrences as riot, accident or sabotage." (Section 21060.3) Fire is an emergency, and cannot be considered in a vacuum of when operations are routine.

**4-6**

The first, and most catastrophic fire potential has already been mentioned under the hazardous waste section above. In addition to the possible electrical ignition of jet fuel and poles and wires falling into the compound, live wires in any area will delay the ability of fire fighters to extinguish the fire. Fire fighters will not go, and rightly so, into an area with live power lines. An existing problem regarding the tank farm is that the Rocklin fire department has limited ability to handle a fuel fire. Reinforcements would be required from Travis Air Force Base. Therefore, increasing the likelihood of fire in that specific area surrounding the tank farm significantly impacts response time, endangering all of the surrounding area.

The second fire impact of the poles is in relation to placing the poles on the railroad corridor itself. Trains are known to derail and be involved in accidents. When there are poles near the tracks, the opportunity for the poles to be struck and damaged is increased. If the poles are downed, fire is an immanent possibility. Not only that, but the 75-110 foot poles could easily fall into residential areas. (Specifically poles 8, 9, 10, 11, 12, 13, 16, 17, 18, 19,20, 21, and 22) When power poles and wires are involved, the fire department sits and waits until power has been turned off. Response time is lengthened. Homes, business, and people are at significantly more risk of injury and death.

Even without a derailment or accident, trains have been known to spark fires. Along highway 65 in the summer of last year, 2000, a train sparked numerous fires along a stretch of about 15 miles. The area along the railroad corridor is open space, and grass fires sprcad quickly, endangering the environment and the surrounding area. The response time of the fire departments is fast, however, if there are high voltage electrical poles in the arca, will their response time be as quick? Will they need the electricity

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turned off, especially if the fire is largely surrounding poles? Will the fires harm or damage the poles or otherwise impair performance? Will the heat from such grassland fires disturb the high voltage wires?

The existence of high voltage poles does not in and of itself create a fire, however power lines do decrease the response time of fire fighters. There are also some significant factors involved in the placement of this project, primarily the tank farm, and downed lines or poles in residential or commercial areas. Other factors which are potentially significant, are the possibility of fires surrounding the project, and the existence of the poles and lines to response time. Accordingly, the DMND's statement that the impact on fire protection is less than significant is unacceptable.

4-6

### Population and housing

On page B-89 the DMND reports that the project will have no impact in the displacement of substantial numbers of existing houses, necessitating the construction of replacement housing elsewhere. This comment is defended on page B-91 of the report because no houses will need to be moved or demolished. Some homeowners probably wish that their homes had to be demolished, because at least they might be paid for the decline in value of their properties. This project is running along the railroad corridor, yes, but right next to several miles of residential areas. The poles and the lines, no matter what PG&E might believe, decrease the property value of all the homes in the visual area. Along 2nd Street, near pole 22, there were 6 homes on the market, right after notice had been given regarding the project. Unfortunately, the many owners have been told that very few buyers will purchase homes that close to power poles and lines. In addition, several lenders will not lend to prospective homeowners on homes which are positioned under or near high voltage power lines. Whether the law recognizes it or not, the damage to values is real. The decline in value may not seem significant to a large corporation such as PG&E but to each individual homeowner, the decline is significant, and taken as a whole, the area will lose millions of dollars of property value.

4-7

Even if the residents of these affected areas can find buyers for their properties, there may be nowhere for the current residents to move. This area, currently, is a nice, affordable area, with starter homes and older homes mixed. There are few other such areas in the Rocklin area. Most new developments in Rocklin are larger more expensive homes. This project will be displacing a number of people.

It is one thing if power lines exist and residential areas grow next to them. It is morally another matter completely when the residential area exists, and the power company comes in and demands the right to erect high voltage power poles and lines and run them right through the community. The whole community is damaged, sickened by the intrusion. Many will want to leave, the lucky will. Yes there may be those that may purchase the existing home, but it will be at significantly lower prices, and they will have made the choice to live next to the power lines.

### Mandatory Findings of Significance

CEQA requires that the whole of the project be considered. Its guidelines, in appendix G, asks the question, "Does the project have impacts that are individually limited, but cumulatively considerable?" "Cumulatively considerable" is here considered in context of past, present or future projects. Several questions are not addressed in this

4-8

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report. If the power load to the Del Mar Station is increased, how is the power distribution of the increased power to be handled? Will the distribution of the increased power run on the existing lines or will additional lines be required to distribute the increased power supply? As the Stanford Ranch/Lincoln corridor continues to grow, how long will this power supply last and will additional lines be required on these existing poles or will larger poles be needed? Or, perhaps, will other power stations need to be built in the growth areas?

**4-8**

The project should also itself be considered cumulatively. Even if each of the areas of concern by themselves are not significant enough to require further study, taken as a whole certainly there is enough significant evidence to suggest further study is required.

Finally, the DMND report must question whether “the project has environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?” B-103. The report declares there is less than significant impact. How, or on what basis is this conclusion drawn? This question has been answered in this letter many times already. Yes, the project will significantly impact the aesthetic and visual quality of Rocklin’s residents. Yes the project may endanger the residents through fire safety, and fuel explosions. Yes the project will demoralize the residents and damage the value of their properties. Yes, the project will degrade the historic district and the quaint quality of the downtown and its redevelopment.

**4-9**

This letter has not yet mentioned a number of human impacts that are also inherent but hard to prove. One example is the harmful effects of electromagnetic fields, or EMF. It is possible to find as many scientists and experts on one side of this debate as the other. But again, whether real or imagined, the value of properties will decline, and the stress level of the residents will increase. If EMF does have harmful aspects, the generations from now will finally have enough data to prove it, and the courts will be filled with law suits. Until then, the residents can only trust the representative scientists, pray, and try to keep concern to a minimum.

**4-10**

Another example is the noise of the wires. Yes, the noise level is within the noise level of city ordinances. The city ordinances are developed not for extended everyday, 24 hours a day kind of noise, but to keep residents free from intermittent sustained loud noise. The type of noise emitted from the wires is a constant irritant that causes some people a great deal of discomfort and stress. It is similar to the wind in Cheyenne Wyoming. The wind is not strong enough to damage anything, or cause people to stay indoors, but it is a constant irritant. Studies have been done to tie the wind to peoples’ moods and an increase in depression, and subsequently an increase in suicides. This is not to say the noise from the power lines will drive people to such drastic measures, but constant noise does increase the feeling of loss of control and moods swings of depression. Especially since these residents have not chosen to live by power lines, their sense of loss of control will be heightened. Additionally, a representative of PG&E who builds this type of pole, has stated that this type of pole is not as safe, has more tendency to spark and creates more noise than the larger poles. This is of additional concern on which the report does not comment.

**4-11**

Despite the quagmire of scientific discussions, power lines do significantly impact the human beings directly and indirectly. The reports conclusions have no basis.

**4-12**

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**4-12**

Personal

Since *Title 14. of the California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act* section 15204. (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended in this section," further comments will be made not strictly related to the document or its unreasonable findings.

First, CEQA should be modified. The process for addressing these types of projects is unfair and prejudicial. The power company has years to plan, study and propose a project. The CPUC and its researchers, in this case, the Aspen Environmental Group, has had at a minimum months to prepare their documentation. The public is given only 20 days to respond. In general, the public will give up, which it appears is what is desired. Those that try to respond are required to find "substantial evidence" to discount the project in 20 days. Not only do the people have to educate themselves on the project itself, they have to educate themselves on the law, become environmentalists, scientists, city planners, fire fighters, engineers and write defensible positions. To do all of this the public is given 20 days. It is not surprising that most projects go through without much comment. It is also obvious, from the format and the CEQA process flowchart, that not much is expected from the public, nor is public comment considered a worthwhile aspect of the process. Somehow, the law should be changed. These projects are life changing aspects of peoples' lives, and the people are not really allowed to defend themselves.

The second aspect of the law that needs to be changed is how notice is given. If it were not for the Placer Herald, only those individuals owning property within 100 feet of the project would have been notified. The Herald ran several articles, which "notified" citizens, and a citizens group also had an outreach program. These "projects" impact more than property owners who live within 100 feet. The 75-110 foot poles can be seen for a significant distance. In the Rocklin area, the poles and lines impact all those who must use Pacific Road to come to and from their homes, or cross the area to shop. It also visually impact the houses on the surrounding hills whose views are now degraded by the prospect of high voltage poles and lines. None of these received notice. Homeowners living within a block of the project did not receive notice. Notice of CEQA projects should be more fairly given.

Another aspect of the CEQA law, which must be changed or modified in its use, is the cookbook approach to preparing reports. Yes, it is understandable that law and business should proceed in the most financially responsible manner, and that timely reports are needed to further "progress", but mistakes are made when old reports are taken off the shelf, dusted off, and presented as new ones. This goes to the good faith effort requirement. In this case, an old report was used. An old map is still being used. This makes the reader question what other old information was used. Are the environmental studies on frogs, new or old? Has anyone even been out to the area currently to study, or are they relying on past research? Obviously, the researchers missed a number of items, such as a tank farm, and a 200-house development to name two. Yes in business old budgets are used to generate new ones, old proposals are tweaked to create new ones, and *Tide* becomes new and improved. But these types of projects are longer lasting and drastically impact peoples lives. Either more care should



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be made when dusting off old reports, or better quality control should be made to ensure that public that a good faith effort has been made, and not some slap shod, effort to ramrod a project through the process.

Lastly, a significant problem is the lack of required cost analysis. Businesses generally do not enter into projects without cost analysis. With the advent of the computers, the demand for variations in the format, inclusion of various items or not, and side by side analysis has greatly increased. (Having worked as an accountant, CPA and/or manager for 22 years, I have some expertise in this area.) The lack of business cost analysis available is deplorable. PG&E representatives guesstimated the cost of undergrounding anywhere from 4 to 20 times the cost of stringing towers. That is a large range of difference. Even if this were only a million dollar project, that is a cost differential of \$4,000,000 to \$20,000,000. Most companies would require a much tighter cost estimate. If this is the manner in which PG&E is operated, it is no wonder they were in financial difficulty, and needed to be bailed out. The PG&E lawyer, at the prehearing conference stated that PG&E did not do cost estimates prior to the acceptance of a proposal. This does not make good business sense. If the costs are too high, a proposal should not be made, and a company would not want to find that out after they have spent money on researching and defending a proposal through a legal procedure. Most likely there are some sort of preliminary cost estimates generated. The law should require cost analysis to be presented, especially if the proposal is being defended on a cost basis, which this one is. The cost structure could be examined, and perhaps alternatives suggested based on full knowledge. As it is, the proposal is thrown at the public, as the only "feasible" alternative with no further explanation available. The public is supposed to present substantial evidence, where is that same requirement for those who proposed the project?

**4-12**

**Conclusion**

"The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives, or feasible mitigation measures available which would substantially lessen the significant environmental effects of the such projects..." (CEQA Section 2102.) This project has been pushed through the system as the only feasible alternative and has been held out to have little or no impact on the environment or the people. This is untrue. There are delineated reasons above, which indicate that the project will have significant impact on the environment and its residents. No alternatives were proposed by PG&E. There are two alternatives which present themselves. The first is to underground the power lines in the existing route. This would solve all of the visual and land use issues. It would also lessen the safety issues as the poles and lines could not fall into the tank farm or residences, and firefighters would not be hindered by above ground lines. This mitigates the effects of the project. Other negative aspects of the project would remain, EMF, possible property values declines... but they would be somewhat mitigated. The other alternative is to find a different route to supply the area in need, perhaps out highway 65. Again the alternative should be to underground the lines as there are existing communities which would be effected.

**4-13**

Please consider all the responses that were received regarding this project. Also consider the number of responses that may have been received if more time were allowed

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to notify all those who will be impacted by this project. Please take into consideration that the public was only given 20 days to prepare the responses and many were trying to fit educating themselves about the project and its effects around work and family life. Though public outcry is not sufficient reason alone to require further study, many aspects of this project do require further study. The public outcry is a symbol of the effects the project will have on the area, and the people who will be impacted. Chapter 1 of CEQA starts, "It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and the public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, **while providing a decent home and satisfying living environment for every Californian.**" All we ask is to protect our homes and families from the potential adverse effects from this project. Please do not accept this proposal, but require an EIR, which will include an alternative of undergrounding the lines.

Sincerely,

Anne Johnson Dazey  
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(916) 632-3207

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**Comment Set 6**

November 15, 2001

Nicolas Procos, CPUC  
 c/o Aspen Environmental Group  
 235 Montgomery Street, Suite 800  
 San Francisco, CA 94104

RE: Atlantic-Del Mar Reinforcement Project

Dear Mr. Procos,

As a long-time resident of Rocklin and recently retired Business Manager of the Rocklin Area Chamber of Commerce, I am greatly concerned about the proposed overhead high voltage power line project referenced above. After reviewing the Draft Mitigated Negative Declaration and Initial Study, I feel it does not adequately address the negative impacts of the project. I oppose installing new overhead power lines through central Rocklin for both safety and aesthetic reasons. These concerns could be put to rest by burying the lines underground, as the City of Rocklin has requested. In fact, it is City policy to put all new utility lines underground, in keeping with ongoing Rocklin redevelopment and beautification projects.

**6-1**

*Hundreds of homes in Rocklin enjoy magnificent views of the Sierra Nevada mountains and foothills from ridges that run parallel to the proposed power line route, only about 1/4 to 1/2 miles to the west of it. None of the simulated photos (Figures 1-2 to 1-5) of the power line show how it will look from that vantage point. And none of those homeowners received official notification of this project. Yet that Sierra view adds priceless enjoyment as well as substantial resale value to those homes. And that value will be significantly decreased, perhaps by as much as 10-15 %, if 75 - 110 foot power poles go in.*

In addition, photo simulations included in the Initial Study seem to abuse perspective to minimize the actual visual impact of this project. Views from *within* the adjacent neighborhoods, where notification did take place, would be quite different from those taken along Pacific Street. *Some unfortunate families will have these poles almost literally in their back yards – another instance of severely decreased property values for Rocklin residents.*

*Safety is also a major concern, particularly in the vicinity of the fuel tank farm near Sunset and Pacific. During the 29 years I have lived in Rocklin, I know of at least two occasions when there have been serious leaks from the tanks, shutting down rail and road traffic in the area. High voltage power lines overhead could only add to the risk of a major disaster.*

**6-2**

Overhead power lines should be a thing of the past within cities, not part of modern planning for a community's utilities. The current proposal jeopardizes Rocklin's safety, economic development, and natural beauty in favor of a less expensive project for PG & E. *Burying the lines would increase the costs for Pacific Gas & Electric, but it is the right thing to do. It is unfair to expect the City, its citizens and its businesses to bear the burden of lowered property values and potential safety hazards for years to come because of huge power poles running directly through our historic downtown area.*

**6-3**

I support the City of Rocklin in requesting that this power reinforcement project be redesigned so that the new high voltage power lines will be placed underground throughout our city.

Sincerely,

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## Comment Set 7

November 13, 2001

Nicolas Procca, CPUC  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 500  
San Francisco, CA 94104

Re: Atlantic – Del Mar Reinforcement Project

Dear Mr. Procca,

As a physician, past four term school board member and thirty year resident of Rocklin, I was surprised and distressed to learn in the local newspaper of PGE's plan to raise transmission poles of 95 foot average height along a four mile Rocklin corridor. Although impacted by this proposal, several thousand of us were not informed of the proposal being outside the 300 foot advisement rule.

7-1

My wife and I reside about one mile from the proposed transmission poles and I can assure you that the photos in the Draft Mitigated Negative Declaration and Initial Study (the "Study") are grossly inadequate. They are not in perspective. In our home one mile from the poles, there will be a major eye sore whether the pole is 75 or (God forbid) 110 feet high. Can you imagine the visual impact to the poor homeowners looking out from their back yard within two blocks of the poles?

Now that terrorism (urban or international) is a real day to day worry, PGE must go back and review its plan to place high voltage lines of that size next to tanks of highly explosive fuel (including jet fuel) and adjacent to the major East-West Union Pacific Rail Line. The Study is a plan for a major domestic terrorist catastrophe given the fact that the tanks have already had two significant leaks that closed down the area for hours. An explosive device detonated on an unprotected chemical train car in proximity to the proposed power lines will produce a firestorm of titanic proportion when the those tanks produce a fireball flash Dresden-type fire storm. Likewise, an unprotected pole blown apart would impact the tanks. The area has already reed with dismay of the urban terrorist plan to blow up propane tanks in Elk Grove.

7-2

I would not want to count the cost in suffering, death, and investments in nearby homes, industry and travelers on adjacent thoroughfares.

I consider that the PGE proposal employs early and outdated technology in the twenty-first century. It will undo all the planning and accomplished revitalization in the downtown Rocklin area. It will produce a significant reduction in property values. It adds to the terror surveillance services burden for rail and community. PGE has the money! PGE has the resources and technical support to adequately bury the transmission lines. PGE does not have to move lines. PGE can do this and ultimately save power in transmission line loss.

7-3

**Comment Set 7, cont.**

PGE can't be allowed to continue its insensitive handling of individuals and communities while turning massive profit even in "bankruptcy".

**7-3**

Sincerely,

Michael Tataro, MD  
5508 Gutano Way  
Rocklin, CA 95377  
(916) 624-2797  
mjtataro@psyber.com

## Comment Set 8

<p>From the office of: Alan Hama B. Sci. - Acct. B. Sci. - Fin. Enrolled Agent Bonded/Licensed</p>	<p>Services: Accounting Tax Codes Pensions Retirement Planning Estates Trusts</p>
<p><i>Touche' Financial</i> 3634 Maple St. Rocklin, CA. 95677 (916) 624-7125 <i>"an affiliated group"</i> <i>dedicated to preservation of the wealth</i></p>	
<p>October 30, 2001</p>	
<p>Aspen Environmental Group 235 Montgomery Street, Suite 800 San Francisco, CA. 94104</p>	
<p>Dear Mr. Procos:</p>	
<p>Re: <u>Atlantic-Del Mar Reinforcement Project: A. 01-07-004</u></p>	
<p><b>Draft Mitigated Negative Declaration and Initial Study</b></p>	
<p><b>Comments</b></p>	
<p>The Report is deficient in that it does not address the impact associated with public safety or the Financial Impact to some but not others, creating payments in excess of proportionate share.</p>	
<p>As to the issue of safety! The rails transport government munitions, deadly chemicals toxic to both, human and environment, explosives and have been known to transport nuclear materials. It is my understanding, that there have been (2) two train derailments directly adjacent to the proposed site in the past (20) twenty years. I need say little more as even an inactive imagination can surely see the potential for a major catastrophe. The report does not address or mitigate the public safety issues in anyway including the ability of various government agencies to respond in the event that emergency services are required.</p>	<p><b>8-1</b></p>
<p>As to the issue of financial impact! The report fails to mitigate the negative impact associated with declining property values and as a consequence fails to eliminate disproportionate subsidies from some but not others to finance the proposed project. The health effects associated with Electrical Magnetic Field (EMF) emissions appears to be an issue unresolved. Whether real or imaginary EMF and alternate real options at a specific price both, serve to reduce the number of potential buyers (demand), have a negative impact on property values and as a consequence, results in a disproportionate distribution of cost by subsidy. In essence, if Pacific Gas and Electric wants to construct electrical transmission facilities they should be required to make property owners whole by compensation regardless of site construction.</p>	<p><b>8-2</b></p>

**Comment Set 8, cont.**

The Draft Mitigated Negative Declaration and Initial Study, fails to provide a cost estimate for underground construction, or cost estimates by outside contractors and is therefore deficient. My observations of the proceedings to date suggest that Pacific Gas and Electric does not know the cost of underground construction, because the first estimate was 4-6 times as much now it is alleged that the cost is 8-12 times.

**8-3**

The Draft Mitigated Negative Declaration and Initial Study is defective because P.G.E. has failed to distribute reports and related materials to all interested parties include the National Transportation Safety Board and Union Pacific Railroad. It is believed that the current proposed site is within Federal Jurisdiction.

**8-4**

It is my contention that, this report is deficient in several respects is self-serving and fails to mitigate issues of primary importance.

**Proposed Solution**

My conversations with the citizens of Rocklin would suggest that no one is opposed to the project per se. Figure B-2, per report indicates that the current route of proposed construction is through a corridor of dense population. This same Figure B-2 reveals an alternative route east of Interstate 5, through a sparsely populated area. The distance from Creekview Ct. to the Rocklin Interstate Loop is approximately one (1) mile the remaining property to the site of destination is undeveloped. It is suggested that a mile and a quarter be underground to mitigate the negative consequences to those few residents affected and that these few are made whole by compensation, in the event that property values are affected.

**8-5**

In my opinion, the city should reclassify any vacate residential property along the proposed route commercial (becomes more valuable) and serves to eliminate the negative impact to those by benefit. It is believed that this proposed route is the route of least resistance and serves to eliminate the cities concerns regarding the impact upon the historical district, alleviates significant visual impact, provides compensation in mitigation due to loss of property values and eliminates the contingent liability associated with derailment and disaster. Call an actuary and tell him/her you would like to insure gross negligence and potentially wrongful death. In addition, the proposed site preserves the cities objectives in a manner consistent with current plans of redevelopment, yet allows PGE to accomplish their goals and objectives.

**Conclusion**

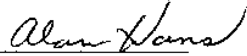
I found it appalling that the current code would allow P.G.E. to pursue a project without public input from inception. And in fact the first notification occurred approximately one week before the final city council meeting. I would think P.G.E was aware for at least two years. P.G.E. needs to take one step back to where they should be at this juncture and include the citizens in public debate. The ninety four thousand dollar question is why should P.G.E or the P.U.C. care what the cost is if those affected agree to pay?

**8-6**

## Comment Set 8, *cont.*

I hereby request that you send me your estimates regarding the number of households and businesses and respective contributions expected to satisfy the debt of construction. Thank you, for your anticipated cooperation.

Yours truly,



Alan Hans  
Accountant

cc: T. Richardson  
R. Hildebrand  
A. Dazey  
K. Dazey  
D. Kraska  
J. Lambert  
M. Cooke  
M. Stevens  
U.P.R.R. (return receipt required)



**Comment Set 12, cont.**

**From:** BevH [bevh@quiknet.com]  
**Sent:** Thursday, November 08, 2001 10:04 AM  
**To:** atlanticdelmar@aspeneg.com  
**Subject:** PG&E transmission lines in Rocklin, Ca.

>> I am a customer of PG&E and I have a complaint and a voice to be heard  
 > concerning overhead transmission lines being put through the town of  
 > Rocklin. These lines should be put underground which PG&E doesn't want to  
 > do  
 > because it would cost more money.I feel the people of Rocklin should not  
 > have to put up with the problems that can be caused by putting the lines  
 > above ground just so PG&E can save a few dollars. We shouldn't have to  
 > pay  
 > for the costly mismangement of PG&E by them cost cutting on the  
 > installation  
 > of the transmission lines.

**12-1**

>  
 > I live in Rocklin near the railroad tracks and close to where PG&E wants  
 > to put their transmission lines. I am totally against this being done. I  
 > think my neighbors feel the same way as my family does. Here are my  
 > reasons:

#1 I feel it is unsafe!!!!!! There have been concerns showing health  
 problems coming from EMF. I don't care if one study says there is no  
 conclusive link between EMF and serious health problems. That is only one  
 not many. A few years after the transmission lines are in, there will be a  
 report changing their mind and it will be too late, because the lines will  
 be there and they won't remove them. This has happened before with studies.  
 They are always changing their minds. It is good for you, then it isn't good  
 for you. Also any health problems are a concern to me. Who is the judge to  
 say what is serious and not serious enough of a health problem? Only the  
 person with the health problem can say. I don't think chances should be  
 taken just to save some company money!!!

#2-----Another safety concern is the possibilty of a train derailment  
 which has  
 occurred twice in the past 20 years. The derailed train cars could hit the  
 lines support system or make it hard to get to the cars to upright them  
 during clean up. Sometimes the train cars carry hazardous materials,  
 chemicals, expolsives and sometimes nuclear materials.What would happen if  
 these lines fell on the derailed cars or some homes, cars or people? It's  
 dangerous enough to clean up derailed cars that are carrying some of the  
 things I mentioned above, but to have to clean up the mess with fallen  
 transmission lines would add to the danger already there, plus I am sure  
 people would be with out electric until everything could be repaired.

**12-2**

#3-----Our city has been putting uderground lines in as part of a  
 beautification effort which has cost us quite a bit of money, and putting  
 the overhead transmission lines would distract and go against what we have  
 been working to accomplish. The city wants to restore the area along the  
 tracks and Front St. back to what it was like in the early 1900's.. We want  
 a museum and to beable to have tourists come see what our town was like ages  
 ago.These

**12-3**

large power poles would be out of place.  
 #4----There will be a decrease in our property values because NOBOBY wants  
 to live under or near power transmission lines!!!! In fact it would be  
 hard to sell our homes if we wanted to. Some people along the tracks have

**12-4**

## Comment Set 12, *cont.*

put their homes up for sale because they are afraid of the danger that would come if the lines are allowed to be above ground and want to get what their property is worth now instead of trying to sell later. The PUC members should ask themselves whether they would want these lines in or near their homes!!!! PLEASE REJECT PG&E'S REQUEST FOR ABOVE GROUND TRANSMISSION LINES!!!!The lines can be put underground and everyone will be safe, property values will be preserved and the cities beautifulcation project can continue as planned.

>  
> Beverly Humphrey 4325 Jamerson Drive, Rocklin, Ca 95677  
> bevh@quiknet.com  
> 916-624-3289  
>  
>  
>  
>

**12-4**