



Date: May 13, 2019

To: Robert Peterson, CPUC
c/o Tom Engels, Horizon Water and Environmental

From: David E. Grim, Development Services Manager

Subject: Public Works Comments on the Draft Alternatives Screening Report for the Estrella Substation & Paso Robles Reinforcement Project Environmental Impact Report (EIR), NextEra Energy Transmission West LLC & PG&E

Thank you for the opportunity to provide information on the Draft Alternatives Screening Report for the subject project. It has been reviewed by several divisions of Public Works, and this represents our consolidated response. We will have more comments once the Draft EIR is available.

1. Primary contact person: David E. Grim, Development Services Manager, County Government Center Room 207, San Luis Obispo CA 93408. (805) 781-1596
2. County Public Works is responsible for reviewing public improvements including streets and utilities, as well as drainage and flood hazard, under the provisions of the Real Property Division Ordinance and the Land Use Ordinance, and Encroachment within the public right-of-way under County Municipal Codes (Title 13) and the Streets and Highway Code.
3. The EIR should address impacts related to encroachment into the County maintained road right-of-way, traffic and circulation, drainage, stormwater, and flood hazard. Initial review based on the Alternatives Screening Analysis include the following observations:
 - a. Both the Proposed Project 70-kV and Alternative SE-PLR-2 are routed through the 100-year floodplain.
 - b. The Proposed Project route shows roughly 4,500 feet placed in an MS4 area and may be subject to Central Coast Post-Construction Storm Water requirements. The EIR should identify impacts and mitigations for post-construction stormwater runoff, and not just construction-specific mitigations per the SWPPP.
 - c. The Proposed Project shows a significant portion of the route within the unincorporated Paso Robles Urban Reserve Line. A sub-portion of this area is identified for "Strategic Undergrounding;" however, the County would require undergrounding of all new utilities within an urban reserve boundary.
 - d. Alternative SE-PLR-2 crosses multiple County roads; encroachment permits would need to be secured addressing construction, traffic control, maintenance, access (including any new roads or driveways to provide access to the facilities), tree removal mitigation, etc., as applicable.

- e. Alternative SE-PLR-2 is routed through residential areas of both the unincorporated area and the City of Paso Robles. These areas will have more traffic circulation impacts depending on specific facility placement and routing.
 - f. Based on the information provided at this time, the Alternative PLR-1 route series appears to have fewer potential constraints related to the topics of concern under the jurisdiction of County Public Works.
4. Utilities (water) concerns include the integrity of the power grid during construction. The County maintains the Santa Ysabel Pump Station on the south end of River Road near Santa Ysabel Ranch, which is a high electrical demand pump station and may be affected by work done on the Templeton Substation alternate location. Also, the Nacimiento Pipeline runs along South and North River Road through Paso and has fiberoptic lines as well. These may cause issues with their proposed alternative alignments from the alternate substation locations in Templeton. Utilities contact person: Mark Chiaramonte, Water Systems Superintendent (805) 781-1597
mchiaramonte@co.slo.ca.us
5. We do not have any alternative projects to suggest for evaluation. We will provide further comments once the Draft EIR is available.

G:\Development\DEVSERV Referrals\Agency-Other\PUC\Estrella Substation Paso Robles\Alternatives Screening Report - Estrella Substation_05092019.docx