

Paso Robles, CA 93446

February 21, 2021

Mr. Rob Peterson
California Public Utilities Commission
Energy Division
c/o Mr. Tom Engels
Horizon Water and Environment
266 Grand Avenue, Suite 110
Oakland, CA 94610

RE: Comments on the Draft Environmental Impact Report (EIR) Estrella Substation and Paso Robles Area Reinforcement Project – Submitted to Horizon Water and Environment via email on February 21, 2021 (estrellaproject@horizonh2o.com)

Dear Mr. Peterson:

I live in a Paso Robles neighborhood which is within the “reconductoring” portion of the Estrella Substation and Paso Robles Area Reinforcement Project. I am a member of the Paso Robles Planning Commission. Before I delve into my concerns, let me state that the thoughts and comments contained within this letter are mine as a property owner and resident of Paso Robles; they are not in any way affiliated with my role as a Paso Robles Planning Commissioner. I have a vested interest in this project as one of the power poles is in my yard.

Project Communications to Affected Stakeholders

The City of Paso Robles sent out a notice for the January 19th City Council meeting and this was the first notice that anyone at my address (including previous property owners) received pertaining to this project. Having received no prior notices, I first learned of the project from one of my neighbors on December 16, 2020, which was the day **after** the project sponsors held their final two virtual public workshops on the same day. Scheduling both key input meetings on the same day, December 15, 2020, was convenient for the project sponsors and their consultants, but it constrained public involvement (even by those receiving the notice) to only those available on one specific day. As a result, I was precluded from participating in one or both sessions.

In late December I reached out to Tom Engels with HorizonH2O to learn more. During subsequent conversations and email exchanges, I learned that since August of 2018, the project sponsors (PG&E and Horizon West Transmission) and their consultants have used a spreadsheet containing 3,463 mailing addresses for notices of meetings and project activities. My property was not included in the original mailing list and the list has **not been updated** to reflect continuing changes in property ownership over the past 2-1/2 years.

Representatives of HorizonH2O, the lead EIR consultant, have provided me with responses to questions that I had after watching both of the December meeting recordings. A project of this magnitude with far reaching implications to both individual property owners and the community at large warrants better communication techniques, up to date mailing lists, and more robust public outreach.

Disregard of Stakeholder and City Input

The California Public Utilities Commission (CPUC) held a public scoping meeting on August 7, 2018, at which time the public had the opportunity to review project alternatives and provide comments. Additionally, during the scoping period, the CPUC received, “numerous comment letters from public agencies, the general public, and other entities.” The most frequently received comments were:

1. Proposed overhead power lines and poles would be out of scale with the community.
2. Overhead lines should be placed underground to reduce aesthetic impacts and/or minimize fire risk.

In a letter to Robert Peterson of the CPUC on August 31, 2018, regarding the project’s Notice of Preparation (NOP), Warren Frace, Paso Robles Community Development Director, stated:

“Having reviewed the NOP, the City urges the CPUC to consider the following comments and to diligently analyze all of the proposed Project’s potential environmental impacts.

Because of the natural beauty in and around the City, and the City’s strong tourism industry, aesthetic impacts are of great concern to the City. The proposed scale of the poles (90 to 113 feet) would be significantly taller than the existing 70kv lines in town and out of scale with the community. Thus, to avoid the significant aesthetic and community dividing effects of the Project, transmission lines should be placed underground to the full extent possible. Where undergrounding is not feasible, shorter poles should be considered.”

Based on information provided to me by the project sponsors and a review of the *Draft Environmental Impact Report* (EIR), it appears that this request, as well as the comments offered during the scoping process, **have been ignored**, particularly as they relate to the reconductoring segment of the project.

Visual Aesthetic Concerns

The reconductoring segment of the project is approximately three miles long. Within this area, two types of poles will be used for replacement according to EIR pages 2-20 and 2-54, and Table 2-8:

1. Light-Duty Steel Poles (LDSPs) with an approximate height of 85 feet above ground and a surface treatment to render the appearance of a natural weathering wood pole. LDSPs have an approximate base diameter of 3 feet.
2. Tubular Steel Poles (TSPs) with an approximate height of 88 feet above ground and no identified finish. Presumably, they will be the silver/gray color of steel. TSPs have an approximate base diameter of 4.5 to 5 feet.

The existing power pole on my lot is wood and has an existing height of about 55 feet. The width of the pole at the ground is 18 inches. PG&E has told me that the replacement pole is slated to be approximately 95 feet in height and given its size, presumably it will be one of the TSPs. If so, the base could be as wide as 5 feet. The height differential between the existing poles and the replacement poles will have a substantial and negative visual impact on homes abutting the line and viewsheds from those properties. Additionally, steel color poles are commonly associated with industrial settings, not residential neighborhoods.

From the existing substation at Niblick Road north to just beyond the Traditions neighborhood, the existing 70kv line passes along the front, side, or rear lots of approximately **117 homes** (Source: Project

Interactive Web Map). All these properties have a high potential of experiencing negative visual impacts from significantly taller poles and lines similar to what I have described above occurring in my own yard. Additional negative visual impacts will be evident from neighborhoods adjacent to the line and from broad areas of Paso Robles due to the sight lines and vistas that are created by the community's undulating topography. As identified in Warren Frace's letter of August 31, 2018, poles of this size will be out of scale with the community. Wide based poles this tall passing through a tight existing residential area are also and importantly, **out of scale with the existing residential neighborhoods**.

The photo below illustrates this point. The height of the existing poles and wires is low enough to largely blend in with the existing tree cover and the rolling topography. Adding 40 feet or more to the height of the poles and wires will make them far more exposed and visible from numerous vantage points around the community.



The EIR fails to adequately assess the negative aesthetic impacts of new poles in the reconductoring area that in some cases, will be 40 feet (or more) taller than existing poles. Furthermore, it does not consider alternatives that would relocate the existing 70kv lines outside of all or part of the existing residential neighborhoods.

The *Draft Environmental Impact Report* includes Appendix F which is the Mitigation Monitoring and Reporting Plan. This section includes Applicant Proposed Measures or Mitigation Measures which are designed to mitigate a range of project impacts. Page F-11 addresses Use, Landscaping, Design and Architectural Elements to Complement the Surrounding Visual Landscape. Identified measures in this section include color recommendations for various project components. They also address the need to "balance the need to minimize visual contrast with ensuring that structures are visible to aircraft pilots and birds." Mitigation measures address the project from the viewpoint of pilots and birds, but are silent on the visual impacts experienced by people on the ground; property owners, nearby neighbors, and the greater Paso Robles community.

Potential to Relocate

Placing the reconductoring lines underground does not appear to be an item that was seriously considered despite it being referenced in the results of the scoping input and as specifically identified in Warren Frace's letter of August 31, 2018. It does not appear that the option of placing the reconductoring lines underground or even potentially relocating them underground along South River Road and North River Road was ever considered. Relocating the lines to a River Road location would help alleviate the adverse visual impact of the new 70kv lines and poles within the existing residential neighborhoods.

Conclusions

My review of the EIR and other project information leads me to the following conclusions:

1. Failure by the project sponsors to maintain an accurate mailing list for project updates and meeting notices over a 2-1/2 year period of time resulted in a flawed notification process.
2. The design of the project, which includes poles in the reconductoring area that are of excessive height and in some cases, colors that are not compatible with residential neighborhoods, is unacceptable and inconsistent with public input received during the scoping phase of the project and with the desires of the City as stated in the letter by Warren Frace on August 31, 2018. Replacing the existing poles with new poles that are 40 or more feet higher will have a negative visual impact on vistas throughout the Paso Robles community. This impact can easily be avoided by replacing the existing poles with new ones of the same height. Doing so would retain the current scale of the electric transmission and distribution system and be more consistent with the scale of the surrounding, well established residential neighborhoods.
3. The aesthetic impacts of the substantially taller poles and wires proposed in the reconductoring area have not been adequately assessed in the EIR.
4. The EIR is void of any mitigation language or measures to reduce the visual impacts of the taller poles and wires in Paso Robles existing residential neighborhoods throughout the reconductoring segment of the project.
5. The project design process and alternatives depicted in the EIR fail to adequately address the placement of the reconductoring lines underground or the relocation of the lines outside of the existing residential neighborhoods.

Thank you for your consideration of the points raised in this letter.

Sincerely,

