May 26, 2021

Mr. Rob Peterson
California Public Utilities Commission
300 Capitol Mall, 4th Floor
Sacramento California 95814

Re: Response to California Public Utilities Commission Data Request No. 6

Dear Mr. Peterson

The documents enclosed with this letter provide the responses of Horizon West Transmission, LLC (HWT) to Data Request Number 6 for the Estrella Substation and Paso Robles Area Reinforcement Project (project). Responses to each data request item are provided directly in the data request tracking table included as Attachment A. The accuracy of the project description changes provided in Table 1 of this Data Request is provided in Attachment B. The following figures are provided in Attachment C:

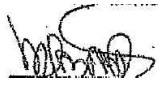
- Revised Draft Environmental Impact Report (DEIR) Project Description Figures
    - Figure 2-7: Estrella Substation and 70 kV Power Line Components - Detailed View (Sheet 1 of 8)
    - Figure 2-11: Preliminary Substation Layout
    - Figure 2-12: Proposed 230 Kilovolt Substation General Arrangement
    - Figure 2-13: Proposed 230 Kilovolt Substation Profile View
    - Figure 2-15: Proposed 70 Kilovolt Substation General Arrangement
    - Figure 2-18: Ultimate Substation Buildout
- Comparison of Substation Parcel Boundaries
- Revised Preliminary Site Grading Plan
- Revised Proponent's Environmental Assessment (PEA) Figure 2-4: Estrella Substation Site Overview Map
- Original PEA Figure 2-4: Estrella Substation Site Overview Map

The revised and original PEA Figure 2-4 provide an overview of the substation components for comparative purposes. A track change Word version of the Updated Project Description, as well as GIS and CAD data depicting the revised layout, are being provided in the email transmittal of HWT's response to Data Request 6.

Errata to the cover letter to HWT's DEIR comments are provided in Attachment D. Errata to Attachment 3 (Detailed Comment Table) of HWT's DEIR comments are provided in Attachment E. A redline version of the errata to Attachment 3 (Detailed Comment Table) of HWT's DEIR comments is provided in Attachment F.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Marcos Mora
Executive Director of Development

ATTACHMENT A

Data Request Responses

#	Resource Area / Topic	Data Request Item	Request Date	Reply Date	Status	Follow-Up Request / Notes	HWT Response
1	Project Description (Attachment 2, Updated Project Description)	Please provide Attachment 2, Updated Project Description, as a track changes version. This will help highlight individual revisions recommended. ***This data request is critical; a detailed, and expedited response is needed to avoid follow-up data request(s) and allow for timely review of the Proposed Project revision(s).***	4/30/21	5/21/21			A tracked change version of the Updated Project Description was provided as Attachment 2 to HWT's DEIR comments. An updated track changes version that reflects the responses and corrections specified herein is being provided with this response (provided in the email transmittal of HWT's response to Data Request #6).
2	Project Description (Attachment 2, Updated Project Description)	The attached Table 1, Comparison of Key Changes to the Project Description (page 3) provides a summary of key revisions captured from Attachment 2. Please confirm the accuracy of the information presented. Where information is incorrect, please update accordingly. ***This data request is critical; a detailed, and expedited response is needed to avoid follow-up data request(s) and allow for timely review of the Proposed Project revision(s).***	4/30/21	5/21/21			Attachment B confirms or clarifies the project description changes provided in Table 1 of Data Request #6.
3	Project Description (MPR Technical Memorandum)	Please provide GIS and CAD data depicting the modified layout, as included in the MPR technical memorandum. Please ensure GIS and CAD data depict the modified permanent access road extension, as described in Attachments 2 and 3. ***This data request is critical; a detailed, and expedited response is needed to avoid follow-up data request(s) and allow for timely review of the Proposed Project revision(s).***	4/30/21	5/21/21			GIS and CAD data depicting the revised layout, including the access road, are provided in the email transmittal of HWT's response to Data Request #6.
4	Project Description (MPR Technical Memorandum)	It is unclear from the Project Revision Technical Memorandum how and whether the additional acres acquired would be used during, and following, construction. Please provide a detailed description as to the purpose of the land acquisition, describing how the additional land would be used during construction, and following construction of the Proposed Project. Please describe what construction activities would occur within these 5 acres (e.g., vegetation removal, grading, staging, construction trailers, etc.)	4/30/21	5/21/21			The additional 5 acres were acquired as part of property owner negotiations. These 5 acres will not be used during or following construction for any project activities, and HWT is not asking for any CPUC approval or authorization to utilize these 5 acres for any new or different use. The additional 5 acres will be separated from the substation site by a steep, approximately 17-foot elevation change, and HWT does not intend to use these 5 acres as part of the project or for any other utility use services. These additional 5 acres will remain available for continued agricultural use. HWT has initiated conversations with the current landowner for continued farming of these additional 5 acres. The substation footprint was reoriented to accommodate a slight adjustment of the parcel boundary to accommodate access to an existing vineyard road and to reflect the as-built location and easement boundary of the existing 230 kV transmission line. The Comparison of Substation Parcel Boundaries figure in Attachment C shows the slight adjustments to the parcel boundaries that occurred to accommodate the vineyard access road and the 230 kV transmission line right-of-way, and the resulting slight reorientation of the substation footprint. Other design changes were done to accommodate PG&E's request for two access points in the 70 kV yard, and to reflect design refinements that are typical at this engineering stage. No project activities would occur within the additional 5 acres being acquired. Moreover, the access road to the 230 kV yard would not facilitate access to the additional 5 acres due to the substantial difference in elevation between the additional 5 acres and the 15-acre substation site, as depicted in Revised Preliminary Site Grading Plan figure in Attachment C.
5	Project Description (MPR Technical Memorandum)	Please confirm whether the Project Revision would change the location of the 15-acre site within the 20-acre parcel. In other words, will the same 15 acres originally proposed for development of the Estrella Substation Facility be developed for this purpose?	4/30/21	5/21/21			The Project Revision would slightly reorient the substation closer to Union Road. However, the substation components would continue to be sited within a 15-acre area as originally proposed for development of the Estrella Substation Facility. As stated above, the substation footprint was reoriented to accommodate a slight adjustment of the parcel boundary to avoid encroachment on the adjacent vineyard access road (to allow continued access to that road by the landowner) and to avoid encroachment on the 230 kV transmission line right-of-way. The boundary of the 230 kV transmission line right-of-way was adjusted based on surveys showing the as-built location of the line. The Comparison of Substation Parcel Boundaries figure in Attachment C shows the slight adjustments to the parcel boundaries that occurred to accommodate the vineyard access road and the 230 kV transmission line right-of-way, and the resulting slight reorientation of the substation footprint. No project activities would occur within the additional 5 acres being acquired.
6	Project Description (MPR Technical Memorandum)	Please provide a revised Figure 2-7 (and GIS data for the figure) of the DEIR. This figure should clearly depict updated areas of permanent and temporary impacts as described in the MPR. Please ensure the extended access road is clearly depicted.	4/30/21	5/21/21			Revised Figure 2-7 (Sheet 1 of 8) is provided in Attachment C. The corresponding GIS data has been provided in the email transmittal of HWT's response to Data Request #6.

#	Resource Area / Topic	Data Request Item	Request Date	Reply Date	Status	Follow-Up Request / Notes	HWT Response
7	Project Description (MPR Technical Memorandum)	The Project Revision memorandum states on Page 1 that construction activities would, "require approximately 68,000 cubic yards of cut and fill, which would be balanced on site to the extent feasible." However, Attachment 2 and 3 of HWT's comment letter state that 16,500 cubic yards of topsoil would be stripped and stockpiled, of which 4,000 cubic yards would be used during restoration, with the balance to be removed from the site. This leaves 12,500 cubic yards of topsoil and 51,500 cubic yards of other soils to be removed from the site. Please clarify how excavated soils would be stored, reused, and/or removed on- and off-site.	4/30/21	5/21/21			Based on the results of the project's geotechnical study, design refinements were made in the grading plan. Since the geotechnical study showed a much thicker topsoil layer for the same project footprint than was anticipated, the overall cut and fill numbers were modified and increased accordingly. The amount of earthwork is now estimated to be about 68,000 cubic yards of cut and fill. The cut and fill would remain on site. The additional earthwork would extend the rough grading of the substation site by 1 week, without impacting the construction duration, which remains at 7 months. The cut and fill figure does not include about 16,500 cubic yards of topsoil, which would be stripped and stockpiled during construction. Of the 16,500 cubic yards, about 4,000 cubic yards would be used on site, and the balance would be removed. It is likely that the balance of the topsoil would be transferred within a 5-mile radius of the project site for a beneficial use.
8	Project Description (MPR Technical Memorandum)	The Project Revision memorandum states on Page 1 that construction activities would extend the construction schedule by one week. It is unclear what specific activities would be extended by one week. Please indicate what changes would be necessitated to the DEIR in Table 2 10 (Preliminary Construction Workforce and Equipment Use, and Approximate Task Durations).	4/30/21	5/21/21			The Project Revision would extend rough grading of the substation by 1 week, but would not extend the total 230 kV substation construction schedule of 7 months. Specifically, 1 additional week would be added to the Site Work Area Preparation Mobilization activity associated with the substation identified in Table 2-10 of the DEIR's Project Description. As part of this submittal, we have revised Table 2-10 to reflect the overall 21-month project construction schedule, which includes the transmission line and substation components. The updated Table 2-10 is included in the tracked change version of the Updated Project Description included with this transmittal in response to Data Request Item #1. Air quality emissions were remodeled to account for the additional truck trips associated with rough grading of the site, which was included as part of PG&E's comments on the DEIR.
9	Project Description (MPR Technical Memorandum)	The Project Revision memorandum states, "[a] design change to the Estrella Substation was necessitated after it was determined that the substation, as originally proposed, would preclude access to the additional five acres of land." Please clarify the meaning of this statement and the purpose of the land acquisition.	4/30/21	5/21/21			The statement was not correct. The mistake occurred due to an internal miscommunication between the engineering and environmental team members. At the request of the landowner, the parcel boundary was adjusted slightly to avoid encroachment on the adjacent vineyard access road (to allow continued access to that road by the landowner), and to avoid encroachment on the 230 kV transmission line right-of-way. The boundary of the 230 kV transmission line right-of-way was adjusted based on surveys showing the as-built location of the line. The substation footprint was reoriented slightly to accommodate these adjustments to the parcel boundary. The Comparison of Substation Parcel Boundaries figure in Attachment C shows the slight adjustments to the parcel boundaries that occurred to accommodate the vineyard access road and the 230 kV transmission line right-of-way, and the resulting slight reorientation of the substation footprint. Other design changes were done to accommodate design refinements that are typical at the advanced engineering stage (i.e., an additional access point into the 230 kV yard and a modified access point into the 70 kV yard). No project activities would occur within the additional 5 acres being acquired. The additional 5 acres also will not be accessible via the substation road. There will be a steep, approximately 17-foot elevation change between the substation footprint and the 5-acre area, which would preclude direct access.
10	Project Description (MPR Technical Memorandum)	The Project Revision technical memorandum describes a "design change" to the proposed Estrella Substation. The memorandum indicates that the 230 kV and 70 kV yards and associated equipment would be reoriented and relocated closer to Union Road. Outside of reorientation, please confirm no other design changes have been proposed and no additional equipment would be included in the modified design. If other design changes are proposed, please provide a detailed description of the differences included in the modified layout.	4/30/21	5/21/21			The Project Revision is limited to a slight reorientation of the substation closer to Union Road. The layout of some of the equipment within the substation yards has been modified, but no additional equipment has been included.
11	Project Description (MPR Technical Memorandum)	Table 1 of the Project Revision technical memorandum states under Tribal Cultural Resources, "The MPR would not increase the amount of permanent or temporary disturbance area, involve a change in the ground-disturbing activity..." This statement conflicts with what is indicated in the revisions to the Project Description, as included in Attachments 2 and 3. Please resolve inconsistencies related to proposed refinements.	4/30/21	5/21/21			The Project Revision would result in approximately 0.2 acre of temporary impact and 15 acres of permanent impact. An additional 5 acres has been included in the overall project site and would continue to be available for agricultural use. The additional 5 acres would not be disturbed by the project.

ATTACHMENT B

Table 1. Confirmation of Project Description Changes

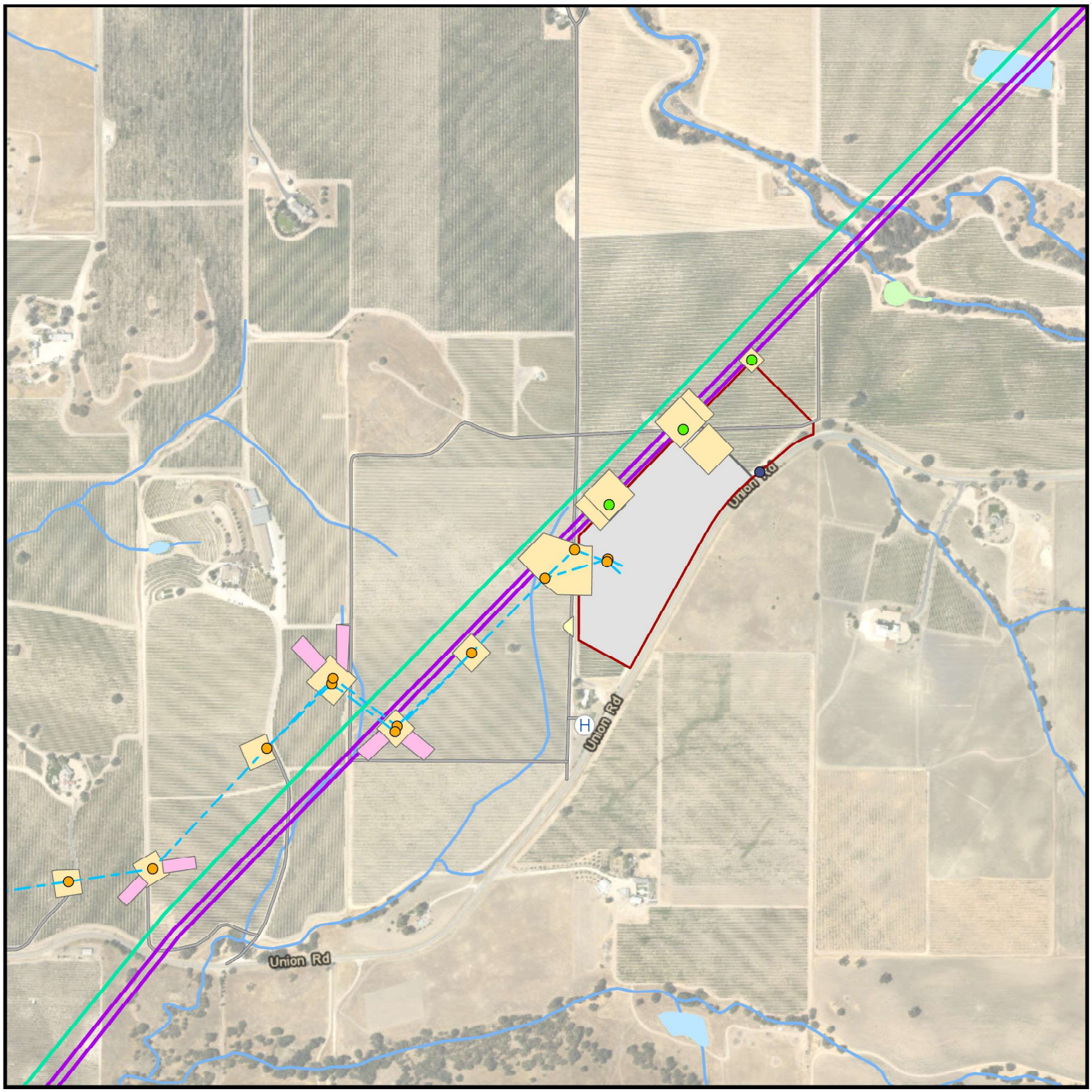
Table 1. Confirmation of Project Description Changes

DEIR Assumption	Project Description Change	Project Description Change Accurately Described?
15-acre parcel site	20-acre parcel site	Yes
15 acres of permanent disturbance	20 acres of permanent disturbance	No The Project Revision would result in 15 acres of permanent disturbance. An additional 5 acres has been included in the overall parcel that includes the project site and would continue to be available for agricultural use. The additional 5 acres would not be disturbed by the project. Therefore, no additional impact to Important Farmland would result, and impacts to Important Farmland from the substation would remain at 15 acres, as currently described in the DEIR.
6.2 acres of temporary disturbance	0.09 acres of temporary disturbance	No The Project Revision would result in approximately 0.2 acre of temporary disturbance.
50,000 cubic yards of cut and fill	68,000 cubic yards of cut and fill (16,500 cubic yards of topsoil stripped and stockpiled of which 4,000 would be used during restoration; leaving 12,500 cubic yards of topsoil and 51,500 cubic yards of other soils to be removed from the site)	Yes Based on the results of the project's geotechnical study, design refinements were made in the grading plan. Since the geotechnical study showed a much thicker topsoil layer for the same project footprint than was anticipated, the overall cut and fill numbers were modified and increased accordingly. The amount of earthwork is now estimated to be about 68,000 cubic yards of cut and fill. The cut and fill would remain on site. The additional earthwork would extend the rough grading of the substation site by 1 week without impacting the overall construction duration since it overlaps with another activity. Even with the 1 week of extra earthwork, the construction duration remains at 7 months. The cut and fill figure does not include about 16,500 cubic yards of topsoil, which would be stripped and stockpiled during construction. Of the 16,500 cubic yards, about 4,000 cubic yards would be used on site, and the balance would be removed. It is likely that the balance of the topsoil would be transferred within a 5-mile radius of the project site for a beneficial use. The truck trips for removing the topsoil were included in the revised air quality analysis.
Main permanent and construction access road (located off Union) – 1,100 feet long and 20 feet wide	Main permanent and construction access road (located off Union) - 1,700 feet long and 20 feet wide	Yes
15-foot Estrella Substation paved access road	700-foot Estrella Substation paved access road	No In the DEIR's Project Description on page 2-21, the main access driveway is described as being paved up to the second entrance of the 70 kV substation or a length of 715 feet. The Project Revision we submitted shows a 700-foot paved driveway.
7-foot chain-link perimeter fence	A minimum of 7-foot chain link perimeter fence	Yes
Access road excavation depth (7 to 21 feet)	Access road excavation depth (2 to 7 feet)	Yes

DEIR Assumption	Project Description Change	Project Description Change Accurately Described?
Staging area for Estrella Substation 1.9 acres (located within the 15-acre site)	Staging area for Estrella Substation approximately 1.9 acres (located within the 20-acre site)	No Staging areas would be entirely within the 15-acre substation footprint and would remain at 1.9 acres. No staging of materials and equipment would occur in the additional 5 acres.
Construction Schedule (Table 2-10)	Construction schedule to extend by one week	Yes
Estrella Substation Estimated Work Dates (7-month duration)	Estrella Substation Estimated Work Dates (21-month duration)	No The Project Revision would extend the rough grading of the site by 1 week. This additional week of activity would overlap with the Fence and Gate Installation activity identified in Table 2-10 of the Updated Project Description. Therefore, the total duration of construction activities at the substation site would still be 7 months as described in the DEIR. The total duration of construction of the project (including power line components and substation) would be 21 months. Refer to the updated Table 2-10 of the DEIR provided in track changes in the Updated Project Description submitted in response to Data Request Item #1.

ATTACHMENT C

Figures



N

0 200 400 800 Feet

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Estrella Substation and Paso Robles Area Reinforcement Project

Estrella Substation and 70 kV Power Line Components

Legend

Alignment Components
- New 70 kV Pole
- 70 kV Poweline Segment

Substation Components
- Substation Interconnection
- Temporary Shoofly Pole
- Substation Permanent Disturbance Area
- Estrella Substation Parcel

Construction Temporary Disturbance Area
- Helicopter Landing Zone
- Access Routes
- Substation Temporary Disturbance Area
- Temporary Pull Sites
- Pole Temporary Work Area

Existing Infrastructure
- 70 kV Powerline Segment
- 500 kV Transmission Line
- 230 kV Transmission Line

National Wetland Inventory
- Freshwater Emergent Wetland
- Freshwater Pond
- Riverine

Prepared by SWCA Environmental Consultants (5/25/2021, 7:59 AM) -
File: Estrella_2021_Estrella_Substation_Site_Overview - Basemap source: ESRI World Imagery

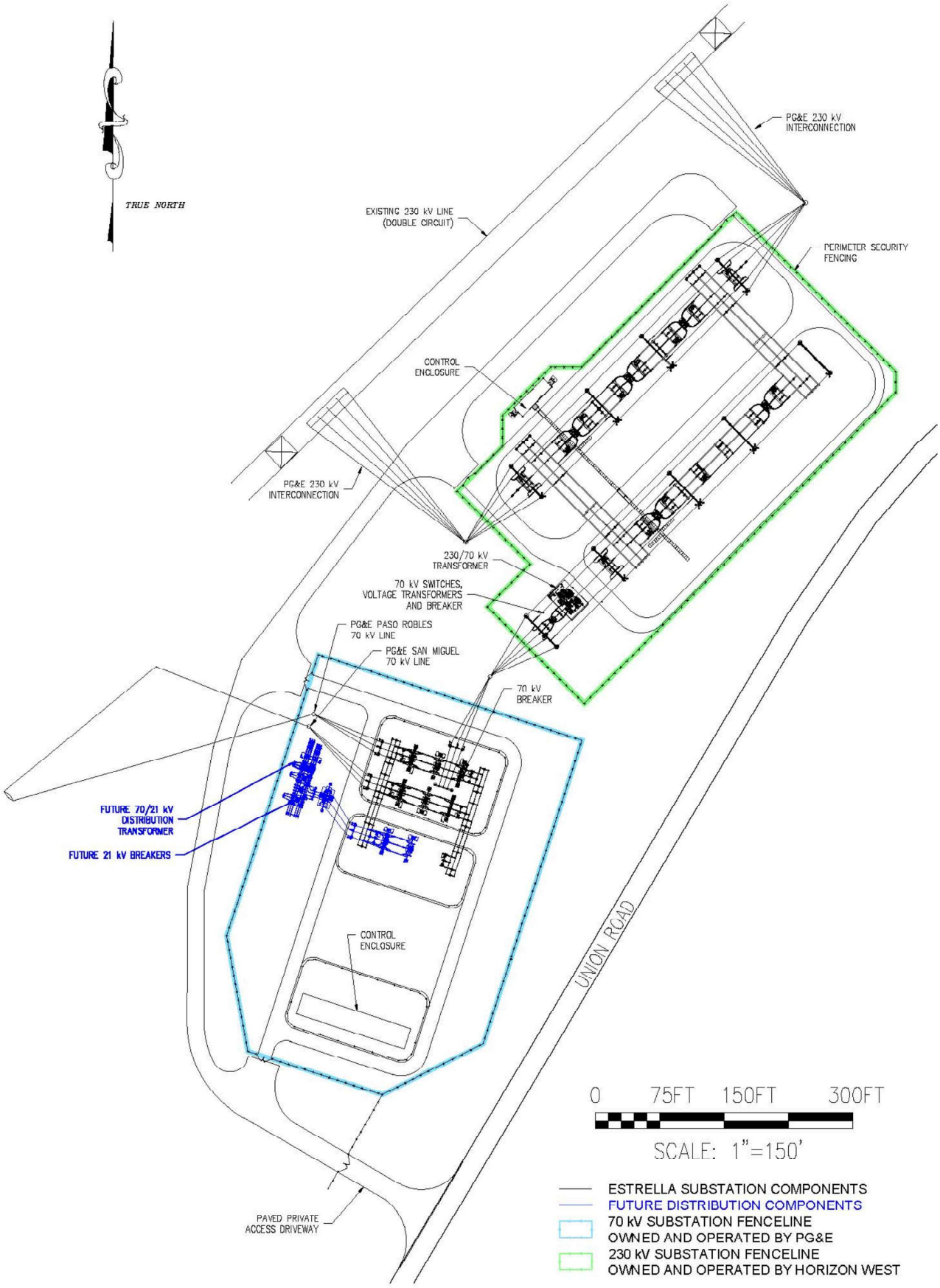


FIGURE 2-11
Preliminary Substation Layout

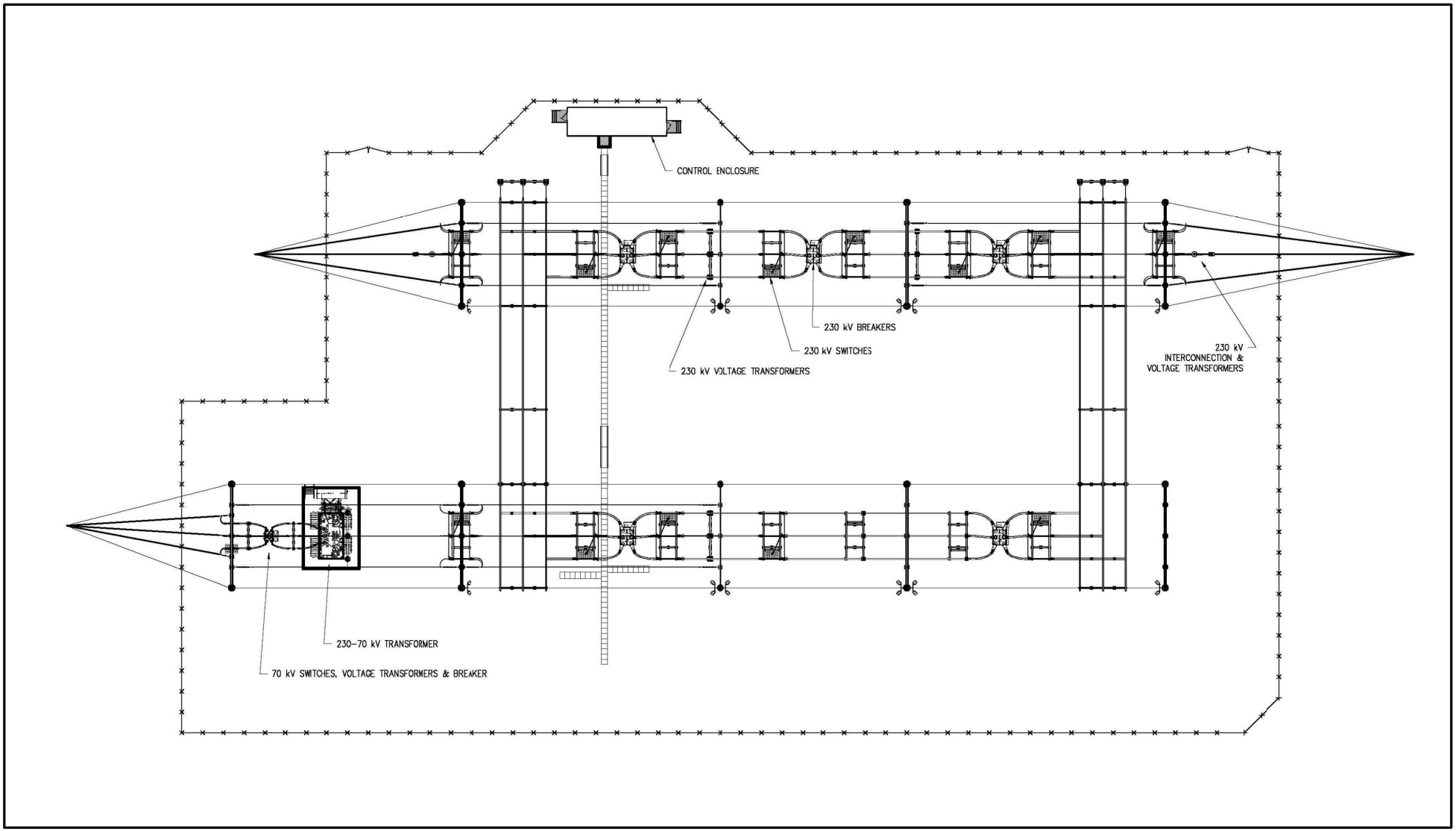


FIGURE 2-12

Proposed 230 Kilovolt Substation General Arrangement

Estrella Substation and Paso Robles
Area Reinforcement Project

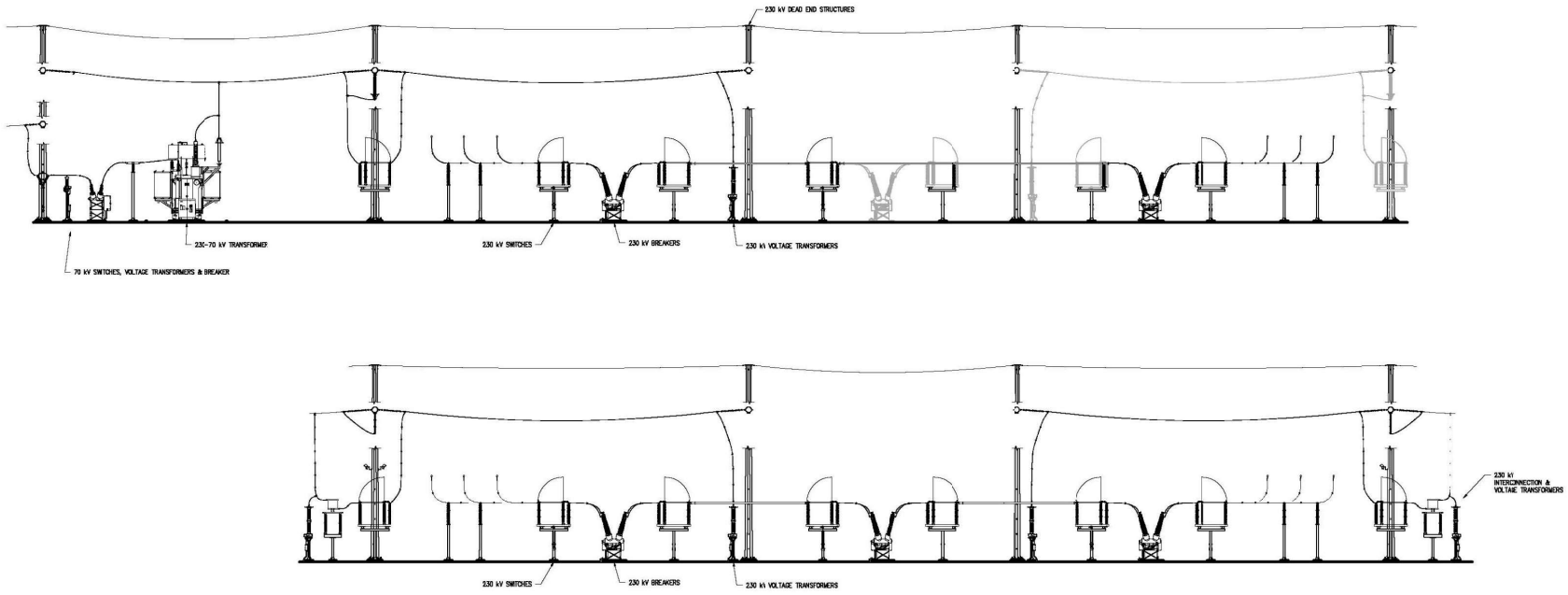


FIGURE 2-13
Proposed 230 Kilovolt Substation Profile View

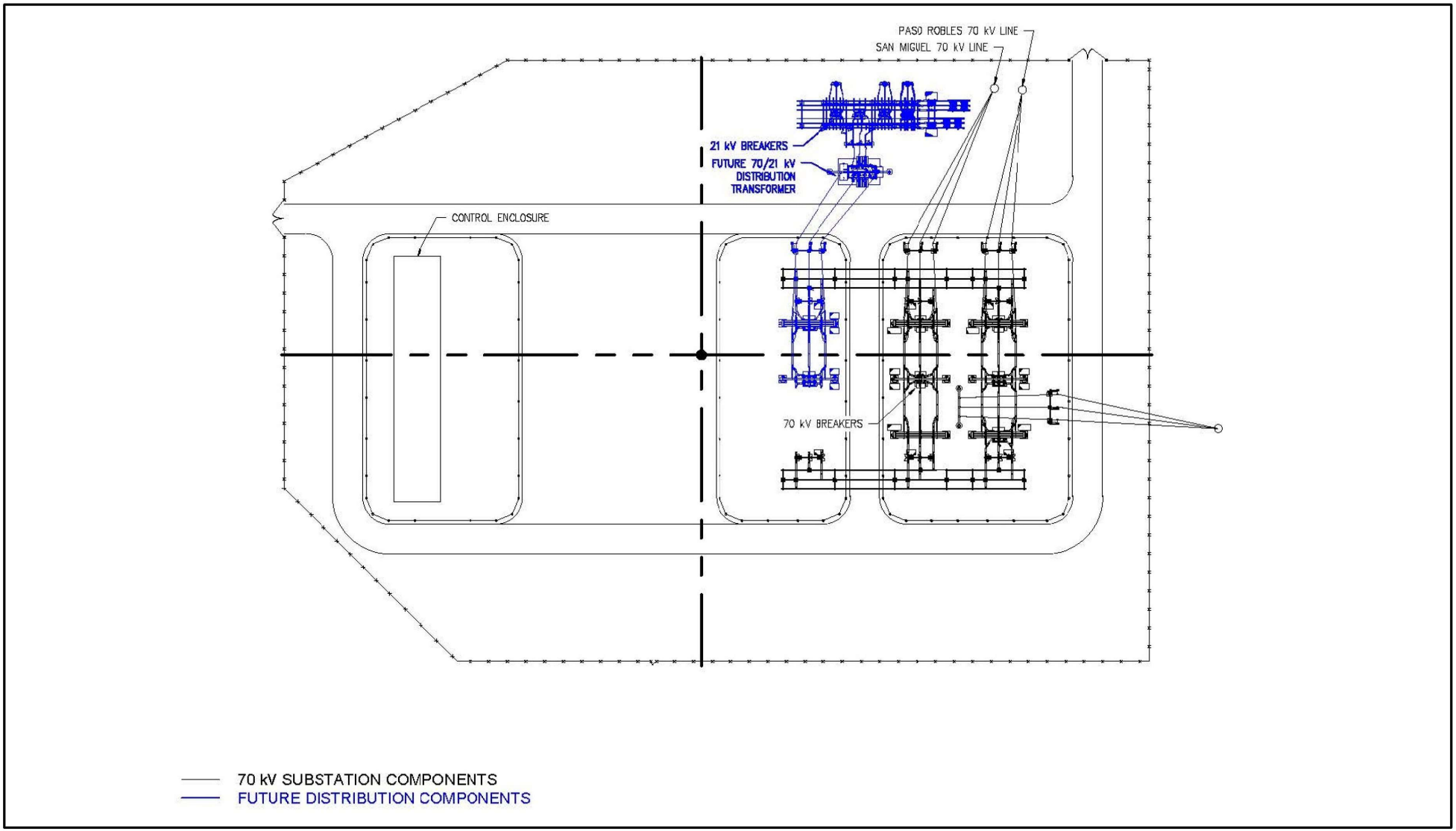
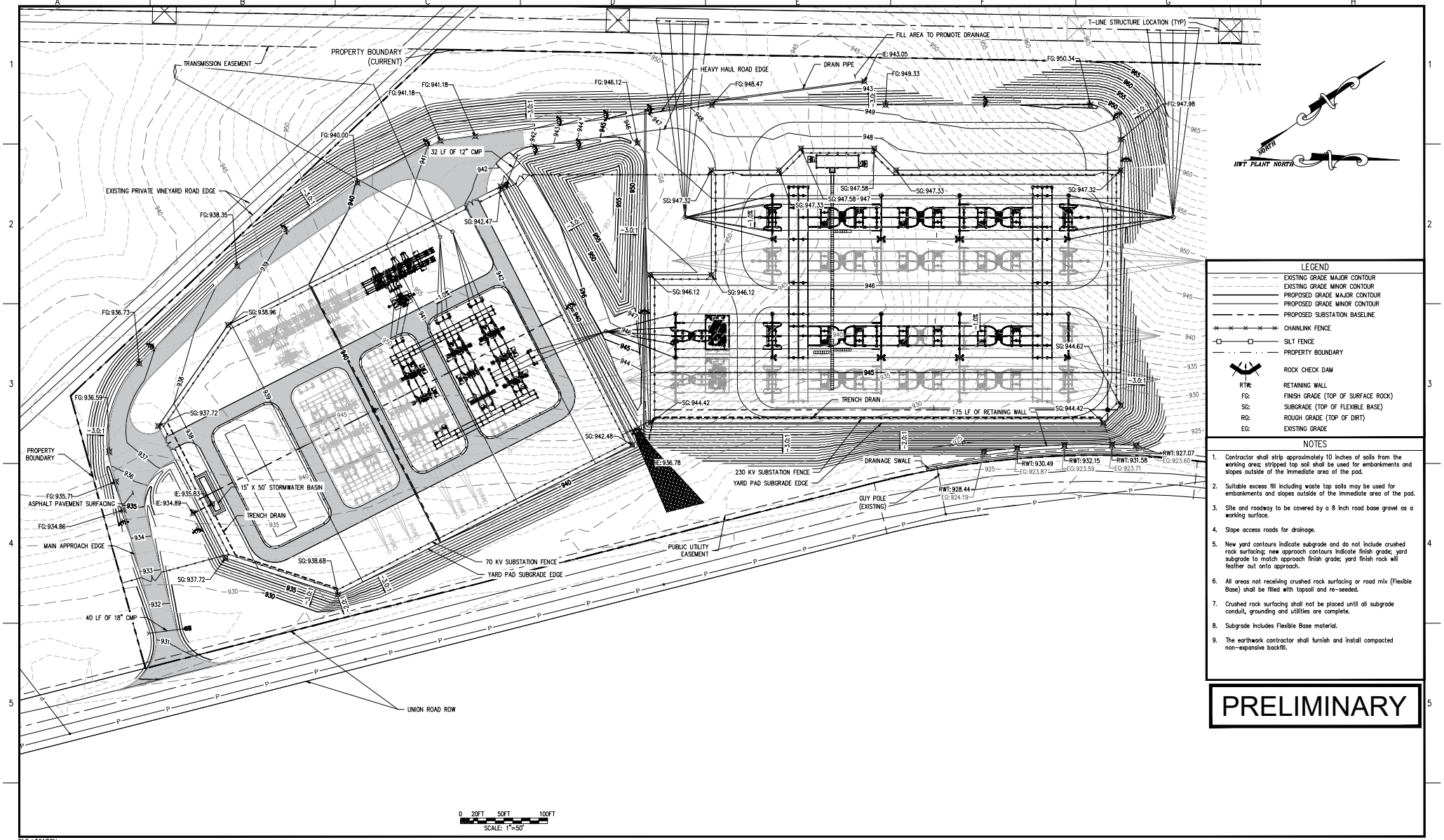


FIGURE 2-15
Proposed 70 Kilovolt Substation General Arrangement

FIGURE 2-18
Ultimate Substation Buildout

Comparison of Substation Parcel Boundaries

Estrella Substation and Paso Robles
Area Reinforcement Project



LEGEND

- EXISTING GRADE MAJOR CONTOUR
- EXISTING GRADE MINOR CONTOUR
- PROPOSED GRADE MAJOR CONTOUR
- PROPOSED GRADE MINOR CONTOUR
- PROPOSED SUBSTATION BASELINE
- CHAINLINK FENCE
- SILT FENCE
- PROPERTY BOUNDARY
- ROCK CHECK DAM
- RTW: RETAINING WALL
- FG: FINISH GRADE (TOP OF SURFACE ROCK)
- SG: SUBGRADE (TOP OF FLEXIBLE BASE)
- RG: ROUGH GRADE (TOP OF DIRT)
- EG: EXISTING GRADE

NOTES

1. Contractor shall strip approximately 10 inches of soils from the working area; stripped top soil shall be used for embankments and slopes outside of the immediate area of the pad.
2. Suitable excess fill including waste top soils may be used for embankments and slopes outside of the immediate area of the pad.
3. Site and roadway to be covered by a 8 inch road base gravel as a working surface.
4. Slope access roads for drainage.
5. New yard contours indicate subgrade and do not include crushed rock surfacing; new approach contours indicate finish grade; yard subgrade to match approach finish grade; yard finish rock will feather out onto approach.
6. All areas not receiving crushed rock surfacing or road mix (Flexible Base) shall be filled with topsoil and re-seeded.
7. Crushed rock surfacing shall not be placed until all subgrade conduit, grounding and utilities are complete.
8. Subgrade includes Flexible Base material.
9. The earthwork contractor shall furnish and install compacted non-expansive backfill.

PRELIMINARY

FILE LOCATION:

"Engineering with Distinction"
ELECTRICAL CONSULTANTS, INC.
BILLINGS, MONTANA

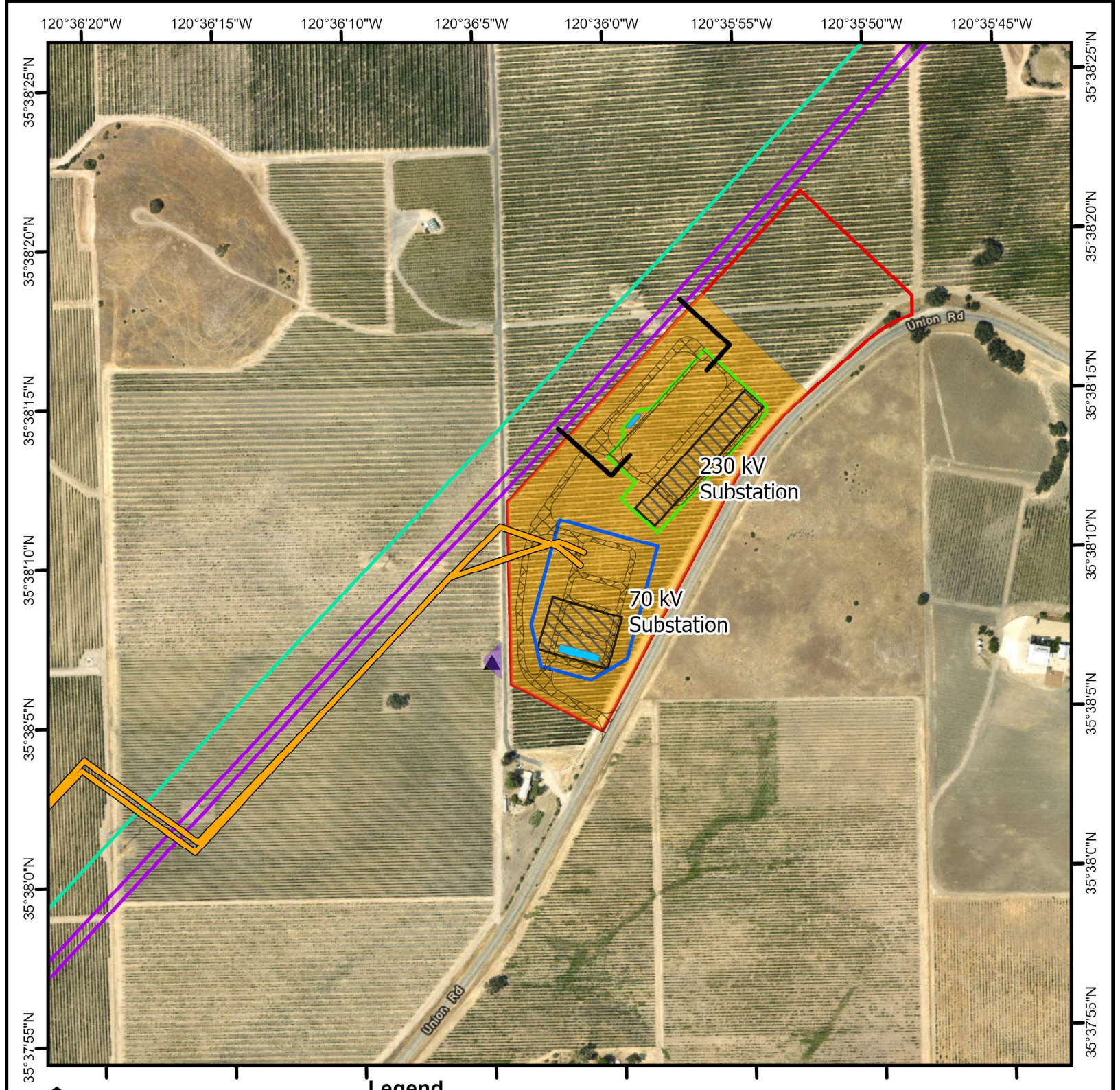
NO	REVISION	DATE	BY	APR
A	ISSUED FOR CPUC REVIEW	05/19/21		

HORIZONWEST TRANSMISSION

ENGINEERING RECORD		DATE
DRAWN		
DESIGNED		
CHECKED		
APPROVED		
DWG SCALE: 1"=50'	PLT SCALE:	

ESTRELLA
230-70 kV SUBSTATION
SITE GRADING PLAN-OVERALL

DWG. NAME: EST-D-P002-2 REVISION NO : A



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Legend

- 230 kV Substation Fenceline
- 70 kV Substation Fenceline
- Substation Permanent Disturbance Area
- Substation Temporary Disturbance Area
- Temporary Substation Staging Area
- Substation Access Roads
- Estrella Substation Parcel
- Control Enclosures
- New 70 kV Power Line Segment
- 230kV Interconnection

Existing Infrastructure

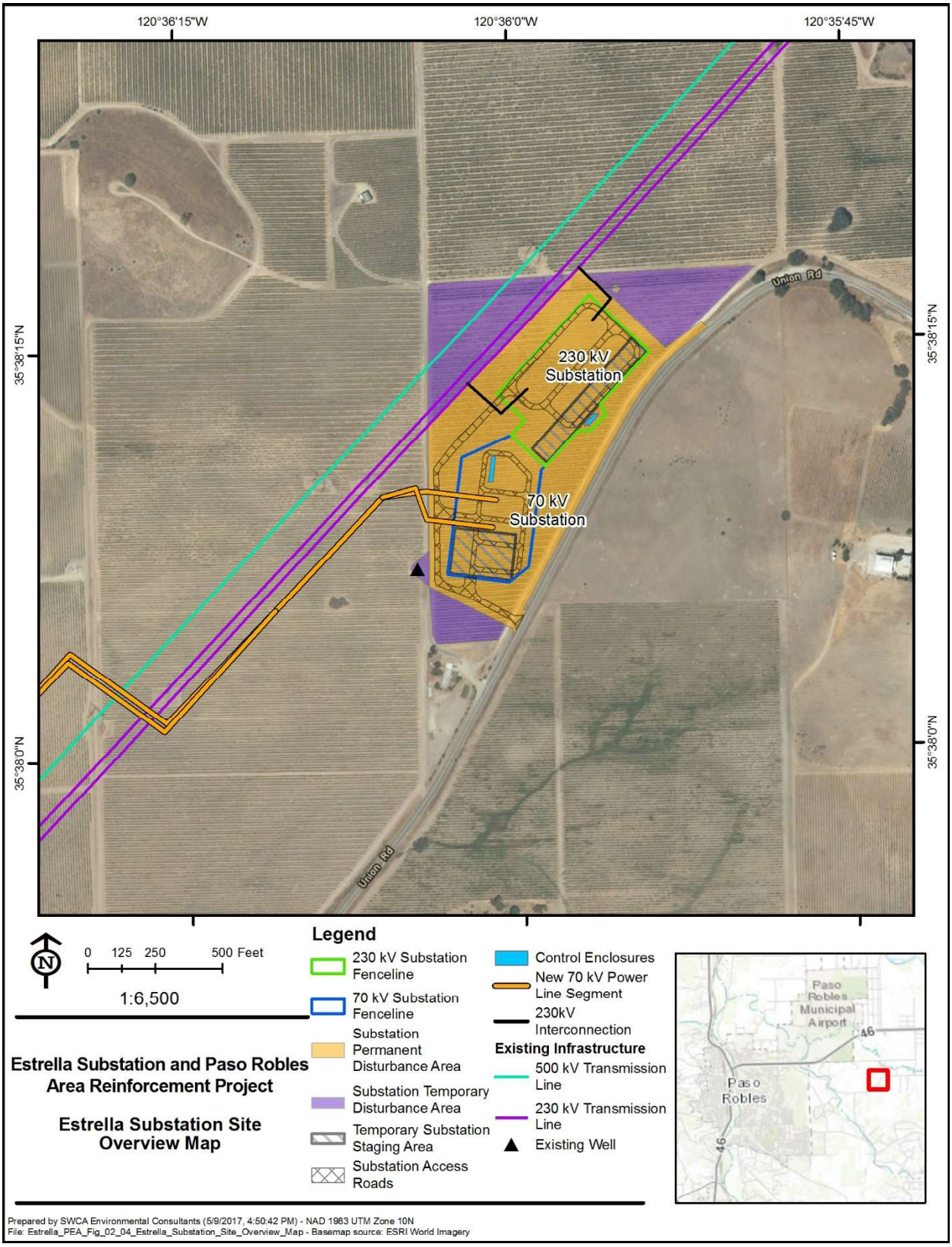
- 500 kV Transmission Line
- 230 kV Transmission Line
- Existing Well

Estrella Substation and Paso Robles Area Reinforcement Project

Estrella Substation Site Overview Map

Prepared by SWCA Environmental Consultants (5/24/2021, 3:51 PM) -
File: Estrella_2021_Estrella_Substation_Site_Overview - Basemap source: ESRI World Imagery

Figure 2-4. Estrella Substation Site Overview Map



ATTACHMENT D

Errata to the Cover Letter to HWT's DEIR Comments

WINSTON & STRAWN LLP
North America Europe Asia

101 California Street
San Francisco, CA 94111
T +1 415 591 1000
F +1 415 591 1400

February 22, 2021—ERRATA Submitted May 26, 2021

By Electronic Mail

Robert Peterson, c/o Tom Engels
Horizon Water and Environment
suncrestproject@horizonh20.com

Re: Comments of Horizon West Transmission, LLC on the Draft Environmental Impact Report for the Estrella Substation and Paso Robles Area Reinforcement Project, December 2020 (California State Clearinghouse No. 2018072071)

Dear Mr. Peterson and Mr. Engels:

This letter and the enclosed documents provide the comments of Horizon West Transmission, LLC ("Horizon West") on the Draft Environmental Impact Report ("DEIR") for the Estrella Substation and Paso Robles Area Reinforcement Project ("Estrella Project" or "Proposed Project") proposed by Horizon West and Pacific Gas and Electric Company ("PG&E"). Horizon West appreciates the time and effort of staff of the California Public Utilities Commission ("Commission" or "CPUC") and its consultants in preparing the DEIR. Horizon West's comments are intended to ensure that the final environmental impact report for the Estrella Project ("FEIR") will be accurate, complete, and consistent with the California Environmental Quality Act ("CEQA").

Section I below provides an overview of the Proposed Project and describes a minor project refinement ("MPR") involving Horizon West's acquisition of an additional five acres for the parcel that includes the site of the substation portion of the Proposed Project (the "Estrella Substation Site"). The MPR also involves the slight reorientation of facilities and equipment at the Estrella Substation Site ~~for access purposes.~~to accommodate a slight adjustment of the parcel boundary to accommodate access to an existing vineyard road and to reflect the as-built location and easement boundary of the existing 230 kV transmission line. The MPR is described in greater detail in the memorandum provided as **Attachment 1** hereto and the updated Project Description provided as **Attachment 2** hereto. Horizon West requests that the Commission incorporate into the FEIR (i) the addition of five acres to the parcel that includes the Estrella Substation Site and the other design refinements described in the MPR in **Attachment 1** hereto, (ii) the additional changes specified in the updated Project Description in **Attachment 2** hereto, and (iii) the comments and corrections specified in the detailed comment table in **Attachment 3** hereto.

Section II below describes the most significant of Horizon West's comments on the DEIR, which are a subset of the comments and corrections specified in the detailed comment table in **Attachment 3** hereto. Specifically, Horizon West requests that the following modifications be incorporated into the FEIR:

- In Agriculture and Forestry Resources, revise Mitigation Measure AG-1 to (i) allow Horizon West and PG&E to utilize other comparable mitigation measures that would achieve conservation easements for important farmland, such as through agreements with landowners to establish and record a conservation easement, or through contributions to a local agency to achieve the agricultural land conservation, and (ii) recognize that PG&E and Horizon West will have different contribution amounts that are based on their respective impacts to important farmland;

- Also in Agriculture and Forestry Resources, revise the FEIR to recognize that placing the Estrella Substation Site within the existing parcel that is under a Williamson Act contract would not conflict with that contract, including its underlying intent;

- In Noise, revise Mitigation Measure NOI-1 so that it will not apply to ground-level construction noise activities determined to have less than significant impacts;

- In the Alternatives Analysis, correct the DEIR's understatement of the visual impacts of Alternative SS-1 (the Bonel Ranch Substation Site), and apply consistent findings regarding Williamson Act contracts to the Estrella Substation Site and the Bonel Ranch Substation Site;

- In the Alternatives Analysis, revise the FEIR to recognize that Alternatives BS-2 and BS-3 are purely speculative and have not been shown to be potentially feasible; and

- Also in the Alternatives Analysis, revise the FEIR to find that Alternative BS-2 and Alternative BS-3 also do not meet the key project objective of increasing reliability and should be eliminated.

I. OVERVIEW OF THE PROPOSED PROJECT AND MPR

On January 25, 2017, Horizon West and PG&E filed a joint application (pending in CPUC Docket Application ("A.") 17-01-023) in which each applicant requests a separate Permit to Construct ("PTC") for its portion of the Proposed Project ("Joint Application").[1] The Proposed Project is a reliability-driven transmission solution that was identified by the California Independent System Operator Corporation ("CAISO") and approved in its 2013-2014

[1] Horizon West is the entity formerly known as NextEra Energy Transmission West, LLC. On May 10, 2019, Horizon West submitted a Notice of Name Change to the Commission. On May 22, 2019, Horizon West filed a *Motion to Change Caption Due to Change in Name* in Docket A.17-01-023. The motion included copies of the California Secretary of State's Amended Certificate of Registration confirming the name change and the Delaware Secretary of State's certification of the name change.

Transmission Plan. The Proposed Project is comprised of the Estrella Substation, which is a new 230 kilovolt ("kV")/70 kV substation, plus a new approximately seven-mile overhead 70 kV double-circuit power line, and replacement and reconductoring of approximately three miles of an existing 70 kV power line. Together, these components comprise the reliability-driven upgrade that the CAISO identified and approved.

The CAISO identified certain components of the Proposed Project as being eligible for competition pursuant to its Tariff and Federal Energy Regulatory Commission ("FERC") Order 1000,[2] including the new 230 kV substation, buswork, and termination equipment and a new 230/70 kV transformer bank. The CAISO conducted a competitive solicitation process and ultimately awarded those components to Horizon West as the approved project sponsor. The other components of the Proposed Project were not eligible for competitive solicitation and were awarded to PG&E as the incumbent utility. Because the Horizon West components and the PG&E components together form a single, integrated transmission project, the parties filed the Joint Application together to request a separate PTC for each applicant's components.[3] As proposed in the Joint Application, Horizon West would construct, own, and operate the new 230 kV buswork and termination equipment and a new 230/70 kV transformer bank at the Estrella Substation, while PG&E would construct the new 70 kV buswork and termination equipment at the Estrella Substation, new 230 kV interconnection facilities needed to interconnect the Estrella Substation to PG&E's existing 230 kV facilities, the new approximately seven-mile 70 kV power line, and the approximately three miles of 70 kV reconductoring.[4]

Since filing the Joint Application and the Proponents' Environmental Assessment ("PEA") in 2017, Horizon West and its engineers have refined the detailed design and engineering plans for the Estrella Substation. This work resulted in an MPR involving the Estrella Substation Site. The elements of the MPR are the following:

- Horizon West will acquire an additional five acres as part of the parcel that includes the Estrella Substation Site. The Estrella Substation ~~thus~~ will be located on the same fifteen acres as originally proposed, but the overall parcel will be a twenty-acre parcel instead of a fifteen-acre parcel. The inclusion of the five acres

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[2] *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132 (2012), *order on reh'g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012).

[3] *See* Joint Application at 3 ("[Horizon] West could not successfully interconnect and energize its 230 kV project components without the project components that only PG&E can build and own. Conversely, PG&E would have no reason to seek a PTC for its 70 kV project components or its 230 kV interconnection facilities unless the [Horizon] West 230 kV project components also were being constructed.").

[4] Joint Application at 10-12.

is reflected in the comments and corrections in **Attachment 1**, **Attachment 2**, and **Attachment 3** hereto.

- ~~Adding~~Unrelated to the addition of the five acres to the parcel, information identified through the engineering process and discussions with the landowner necessitated slight adjustments to the parcel boundary, which required a design change to the Estrella Substation to reorient it to ~~allow access to~~align with the ~~five-acre addition~~adjusted parcel boundary. Specifically, the parcel boundary was adjusted to avoid encroachment on the adjacent vineyard access road (to allow continued access to that road by the landowner) and to avoid encroachment on the 230 kV transmission line right-of-way. As a result, the 230 kV and 70 kV yards and associated equipment will be slightly reoriented closer to Union Road. At its closest point, the fence line will be located approximately 64 feet northwest of Union Road, as shown in Figure 2 in **Attachment 1** hereto. ~~Without this change, the design would preclude access to the five-acre addition to the site. This slight reorientation will require approximately 72,000 cubic yards of cut and fill, which will be balanced on site to the extent feasible.~~ The MPR will only result in a slight reconfiguration of the yard equipment and will not affect the type of electrical equipment to be housed within the site's fence line as originally proposed.

As demonstrated in the analysis presented in the memorandum in **Attachment 1** hereto, construction and operation activities associated with the MPR would not result in a new, significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria applied in the DEIR. Table 1 in **Attachment 1** hereto provides a summary of the potential impacts for resource area analyzed in the DEIR. The elements of the MPR reflect the updated design plan for the Estrella Substation and should be reflected in the FEIR as insignificant changes to the Estrella Substation design.

II. KEY SUBSTANTIVE COMMENTS ON THE DEIR

A. In Agriculture and Forestry Resources, Mitigation Measure AG-1 should be revised to allow use of comparable mitigation measures and recognize that Horizon West and PG&E will have different contribution amounts.

The DEIR finds that the Proposed Project would convert 2.66 acres of Farmland of Statewide Importance and 11.76 acres of Unique Farmland to non-agricultural uses, and concludes that the conversion of this small amount of acreage would constitute a significant impact.[5] This suggests that the permanent conversion of any amount of designated farmland acreage, however small, is a significant impact.

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[5] DEIR at 4.2-12 through 4.2-13. ~~The acreage numbers in Tables 4.2-1 and 4.2-2 in the DEIR are updated in the comments in **Attachment 3** hereto to reflect the addition of five acres to the Estrella Substation Site.~~

Use of this stringent threshold would create a precedent for any project with any conversion of designated farmland, however small, to result in a significant agricultural impact. This negates the use of the California Agricultural Land Evaluation and Site Assessment Model ("LESA") which is endorsed by the Department of Conservation ("DOC") as an alternative and arguably more rigorous approach to assessing impacts to designated farmland.[6] The DOC's website states: "The California LESA Model was developed to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095), including in California Environmental Quality Act (CEQA) reviews."[7] The DEIR's approach negates any quantitative assessment of potentially significant effects on the environment of agricultural land conversions by rendering any conversion of any acreage, regardless of overall quality or viability for agricultural purposes, a significant impact. Rote application of the DEIR's stringent threshold, without more analysis of factors specific to the Proposed Project and its location, would be contrary to CEQA because "thresholds cannot be used to determine automatically whether a given effect will or will not be significant."[8] Indeed, Section 15064(b)(2) of the CEQA Guidelines was revised in 2018 to reflect this.

Use of the DEIR's stringent threshold also is a departure from the thresholds applied for the conversion of agricultural lands by other CPUC-approved projects. The PEA evaluated the impacts of the Proposed Project's conversion of agricultural land based on the CPUC's analysis of PG&E's Shepherd Substation project in A.10-12-003, approved May 2013. For that project, the CPUC recognized a standard of significance based on Government Code Section 51222, which identifies 10 acres as the size of a parcel large enough to sustain agricultural use in the case of Prime Farmland, and 40 acres in the case of Farmland of Statewide Importance, Unique Farmland, and non-Prime Williamson Act lands.[9] The Commission also applied a minimum size threshold of significance in the 2015 Mitigated Negative Declaration and Supporting Initial Study ("MND/IS") for the Southern California Edison Company ("SCE") Banducci Substation Project in A.12-11-011. In that case, the CPUC found no significant impacts for SCE's substation project, even though 6.3 acres of Prime Farmland would be converted to non-agricultural use.[10] Specifically, the CPUC found a less than significant impact based on the conclusion that the 6.3 acres of converted Prime Farmland represents 0.001 percent of the 608,789 acres of Prime

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[6] The LESA model is described on the DOC website at: https://www.conservation.ca.gov/dlrp/Pages/qh_lesa.aspx.

[7] *Id.*

[8] *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1108-1109.

[9] PEA at 3.2-21, citing the PG&E Shepherd Substation Project IS/MND (May 2012) at 3.2-8 through 3.2-9.

[10] *See* SCE Banducci Substation Project MND/IS at 5-59.

Farmland in Kern County.[11] Under these thresholds, the Proposed Project's impacts are less than significant because the Proposed Project would convert a *de minimis* amount of Prime Farmland, less than 40 acres of the other categories addressed in Government Code Section 51222, only 0.~~001~~0001 percent of the approximately 22,697 acres of Farmland of Statewide Importance in San Luis Obispo County, and only 0.~~0004~~0003 percent of the 45,175 acres of Unique Farmland in San Luis Obispo County.~~[12]~~ The Commission should consider whether the threshold applied in the DEIR should be adjusted in the FEIR for consistency with these statutory standards and prior Commission precedent.

Additionally, although the Commission has applied the DEIR's stringent standard in a recent case,[13] this "binary" standard of deeming significant any loss of farmland fails to consider additional factors such as the overall acreage subject to conversion (which in this case is a small number), or the value of the farmland to be converted, using for example, the LESA model as supported by the DOC, or the relative percentage of Prime and other farmland to be converted compared to the overall acreage in the county. Under the DEIR's approach, any conversion of Prime Farmland, Farmland of Statewide Importance, or Unique Farmland is automatically a significant and unavoidable impact. This approach overstates the Proposed Project's impacts.

To the extent mitigation is required, Mitigation Measure AG-1 should be revised to allow Horizon West and PG&E to utilize other comparable mitigation measures that would achieve conservation easements for important farmland, such as through agreements with landowners to establish and record a conservation easement, or through contributions to a local agency to achieve the agricultural land conservation requirement.[14] Mitigation Measure AG-1 requires contributions to the California Farmland Conservancy Program, which promotes the long-term preservation of agricultural lands in California though agricultural conservation easements. Based on preliminary outreach, the California Farmland Conservancy Program is not aware of the Proposed Project and

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[11] *Id.*

~~[12] These percentage are calculated using the adjusted acreage numbers in the detailed comments in **Attachment 3** hereto, which include the addition of five acres to the Estrella Substation Site.~~

[13] *See* SCE Circle City Substation and Mira Loma-Jefferson 66 kV Line Project (A.15-12-007).

[14] In addition to applying the stringent threshold, the DEIR finds that Mitigation Measure AG-1 (as discussed in the DEIR on page 4.2-13) "would not fully offset the significant impact because it would not create any new Important Farmland . . . ." This finding may be intended to follow the decision in *King and Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814 addressing a situation involving a vastly larger permanent loss of designated farmland acreage. It should be recognized, however, that CPUC precedent has allowed the use of conservation easements to mitigate such impacts to less than significant levels, and that the 2018 revisions to the Section 15370(e) of the CEQA Guidelines make clear that "mitigation" includes "[c]ompensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements." Cal. Code Regs., tit. 14, § 15370(e). The holding in *King and Gardiner Farms* therefore is not appropriate here.

does not have a clear plan for implementing this mitigation measure. To provide flexibility and ensure that Horizon West and PG&E can comply, Mitigation Measure AG-1 should be revised to allow comparable mitigation as shown below and in the detailed comment table in **Attachment 3** hereto. The changes below also are necessary to clarify the scope and required timing of the mitigation, as well as the specific criteria that will be applied to confirm that the mitigation measure has been satisfied.

> Mitigation Measure AG-1: Provide Compensation for Loss of Agricultural Land.
>
> HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall finalize and effectuate any combination of the following as long as the total acreage in the aggregate equals the amount required by the conservation ratio specified below: either (1) contribute ~~sufficient~~ funds, in an amount equal to the fair market value (determined as of the date construction commenced) of each acre for which the contribution is made, ~~(i.e., adequate to support the conservation ratio described below)~~ to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives, or to another public agency or non-profit organization able to achieve long-term preservation of agricultural lands in San Luis Obispo County; and/or (2) enter into and record one or more conservation easements with landowners for specific farmland in San Luis Obispo County. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements and is one potential recipient of any contribution in clause (1) above. The acreage for which ~~amount of~~ HWT's and PG&E's contributions are made in clause (1) above, together with any acreage preserved through recorded conservation easements in clause (2) above, shall equal a minimum total ~~ensure the conservation~~ of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by their respective components associated with the Proposed Project or alternatives~~, based on the market price for the commensurate agricultural land at the time that the impacts occur~~.

B. Also in Agriculture and Forestry Resources, the DEIR's conclusion of significant and unavoidable agricultural impacts due to conflict with an existing Williamson Act contract misapplies the law and should be corrected.

The DEIR also contradicts applicable law in its conclusion that the Proposed Project's agricultural impacts are significant and unavoidable due to conflict with an existing Williamson

Act contract.[15] The DEIR concludes that removing 15 acres[16] for the Estrella Substation Site from the current 98-acre Williamson Act parcel would conflict with the existing Williamson Act contract's "intent" to "preserve agricultural land in agricultural use."[17] This is not correct, however, because Government Code Section 51238 expressly provides that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Further, as noted in the DEIR, removing the acreage for the proposed substation parcel from the 98-acre Williamson Act parcel would not disqualify the remainder (*i.e.*, 78 acres) from being an agricultural preserve under the County of San Luis Obispo's Rules of Procedure to Implement the California Land Conservation Act of 1965. Indeed, the remaining 78 acres under the modified Williamson Act contract satisfy the acreage under the County's rules, (*i.e.*, 40-acre minimum parcel size) and will continue to be cultivated and with land uses limited to compatible uses. In short, the Proposed Project does not present a conflict with the existing Williamson Act contract, and the DEIR's conclusion of a significant and unavoidable impact is contrary to law and lacks a factual basis.

To be consistent with Government Code Section 51238, the language in the DEIR on page 4.2-15 should be modified in the FEIR as follows:

> ~~However, p~~ Placing the substation within the existing parcel under Williamson Act contract would not conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use, because Government Code Section 51238 specifies that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Removing the proposed substation parcel from the 98-acre Williamson Act would not disqualify the remaining contracted area from an agricultural preserve, and the remaining parcel will exceed the 40-acre minimum parcel size specified in the original contract.

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15 DEIR at 4.2-14.

16 As explained above, five acres will be added to the parcel that includes the Estrella Substation Site, but only fifteen acres will be used for the Estrella Substation Site.

17 DEIR at 4.2-15.

C. The DEIR incorrectly applies Mitigation Measure NOI-1 to all construction activities, even though ground-level construction noise impacts are determined to be less than significant.

CEQA is clear that mitigation measures are not required for effects which are not found to be significant.[18] The DEIR on page 4.13-18 states that "ground-level construction noise from the Proposed Project would not be significant given: (1) the limited number of noise-sensitive receptors in proximity to much of the Proposed Project; (2) the relatively rapid attenuation of even the loudest pieces of construction equipment with distance from the source, and (3) the impacts would be temporary and occur over a relatively short duration at individual structure locations or segments of the 70 kV power line alignment (as opposed to work occurring along the entire alignment simultaneously)." Notwithstanding the DEIR's finding that ground-level construction noise impacts will be less than significant, the DEIR states that Mitigation Measure NOI-1 is applicable to all construction activities. The DEIR provides no basis for this requirement, and it appears wholly unnecessary and onerous given that Applicant Proposed Measure (APM) NOI-2 is expressly discussed in the DEIR as a way to further reduce the already less than significant ground-level construction noise impacts.[19] Given this, Horizon West requests that the FEIR not require NOI-1 for ground-level construction activities.

D. The DEIR correctly selects the Estrella Substation Site as the environmentally superior alternative, but understates or ignores significant impacts that would result from Alternative SS-1 (the Bonel Ranch Substation Site).

The DEIR concludes that Alternative Combination #2 "offers the most advantages and least drawbacks among the Proposed Project and other alternative combinations."[20] Alternative Combination #2 consists of the Estrella Substation (*i.e.*, the Proposed Project), Alternative PLR-1A, Alternative BS-2, and Alternative BS-3.[21] Horizon West agrees with the DEIR's assessment that the Estrella Substation as proposed by Horizon West is the environmentally superior alternative as compared with the other alternatives for the substation site.

Although the DEIR correctly selects the Estrella Substation as environmentally superior, the DEIR ignores or understates some of the impacts associated with the alternative substation site labeled as Alternative SS-1 (also referred to as the Bonel Ranch Substation Site). As Horizon

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[18] Pub. Res. Code § 21002; CEQA Guidelines, Cal. Code Regs., tit. 14, §§ 15126.4, subd. (a)(3) and 15091.

[19] DEIR at 4.13-18.

[20] DEIR at 5-13.

[21] DEIR at 5-1.

West detailed in its comments on the Alternatives Screening Report,[22] which is included in the DEIR as Appendix B, the Bonel Ranch Substation Site would result in significant impacts. The DEIR ignores or understates those impacts, as explained below.

First, the DEIR fails to recognize the significant visual effects of locating the substation at the Bonel Ranch Substation Site. As discussed in the DEIR on page 4.1-45, the Bonel Ranch Substation Site would be located adjacent to the Estrella River in an agricultural area, with the closest residence located approximately 0.5 mile west on Estrella Road. While the DEIR states that "[d]evelopment of the substation at the Bonel Ranch site would substantially alter the visual character of this immediate area and its agricultural setting," the DEIR concludes incorrectly that the alternative would have a "less severe effect on the area's visual character and visual quality" compared to the Proposed Project due to lower "viewer concern" and "exposure."[23] The DEIR reaches this conclusion by asserting that the Estrella Substation Site would be visible from numerous wineries and from motorists along Union Road, whereas the Bonel Ranch Substation Site would reduce aesthetic impacts because it would not be visible from any vineyards or wineries and would affect a fewer number of motorists because the average daily traffic along Estrella Road is substantially less than along Union Road. This analysis fails, however, to consider potential changes to the visual character and quality of the Bonel Ranch Substation Site that would result if the substation were located there, including potential visual incompatibility with the surrounding landscape as seen from Estrella Road. In fact, comparison of the visual simulations in the DEIR for key observation points ("KOPs") 1 and 2 (near the proposed Estrella Substation Site) compared to those for KOPS 11, 12 and 13 (near the Bonel Ranch Substation Site) contradict the DEIR's conclusion.[24] As can be seen in the visual simulations for KOPs 1 and 2 (near the proposed Estrella Substation Site), the existing transmission line structures already present a degraded visual landscape in KOPs 1 and 2. In contrast, KOPs 11, 12 and 13 (near the Bonel Ranch Substation Site) all have agrarian landscapes untarnished by industrial structures. Additionally, construction of the Alternative PLR-1C route (or minor route variation) could result in additional visual impacts to these KOPs, but the DEIR does not discuss these potentially significant impacts. The DEIR thus lacks substantial evidence supporting the conclusion that visual impacts from Alternative SS-1 would be less significant than those for the Estrella Substation Site.

Second, the DEIR fails to identify potentially significant agricultural impacts from the Bonel Ranch Substation Site due to cancellation of a Williamson Act contract, despite finding a significant impact for the Estrella Substation Site due to such cancellation. As stated above, the DEIR's finding of a significant impact for the Estrella Substation Site for Williamson Act reasons is contrary to the Government Code. But if the Commission retains that conclusion in the FEIR for the Estrella Substation Site, then the FEIR must reach the same conclusion regarding the Bonel

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[22] *See* Comments of Horizon West Transmission, LLC (formerly known as NextEra Energy Transmission West, LLC) (U 222 E) on Draft Alternatives Screening Report for the Estrella Substation and Paso Robles Area Reinforcement Project (A.17-01-023), dated May 10, 2019.

[23] DEIR at 4.1-46.

[24] *Cf.*, DEIR, Figures 4.1-2 through 4.1-3 with Figures 4.1-11 through 4.1-12.

Ranch Substation Site. According to the San Luis Obispo County Land Use View GIS mapper, the Bonel Ranch Substation Site parcel is under an existing Williamson Act contract. The DEIR erroneously reaches the opposite conclusion. This should be corrected in the FEIR, and the FEIR's findings regarding Williamson Act contract implications should be consistent for the Estrella Substation Site and the Bonel Substation Site. Recognizing impacts accurately and consistently will provide additional support for selection of the Estrella Substation Site as the environmentally superior substation alternative.

E. Alternatives BS-2 and BS-3 are purely speculative, have not been shown to be potentially feasible, and should be eliminated.

As noted above, the DEIR selects Alternative Combination #2 as the environmentally superior alternative based on the conclusion that it "offers the most advantages and least drawbacks among the Proposed Project and other alternative combinations."[25] Alternative Combination #2 includes as distribution components Alternative BS-2 and Alternative B-3. Alternative BS-2 would involve installation of front-of-the-meter ("FTM") battery energy storage systems ("BESSs") connected to the distribution system to defer the need for additional distribution capacity in the Paso Robles Distribution Planning Area ("DPA").[26] The DEIR used "illustrative" and "potentially feasible" sites for Alternative BS-2, and acknowledges that: "Because site-specific analyses are speculative at this time, this DEIR uses the illustrative sites to demonstrate the feasibility of this alternative, and the relatively small footprint these facilities would occupy throughout the project area."[27] Alternative BS-3 would involve behind-the-meter ("BTM") solar and battery storage to reduce loading on circuits within the Paso Robles DBA.[28] The DEIR does not identify site locations for Alternative BS-3 based on statements that: "Because it is unknown which specific customers will opt into the BTM resources program and install BTM resources on their property, the specific locations of activities under Alternative BS-3 are unknown;" and "In general, BESS would be anticipated to be installed within existing commercial and industrial buildings, and within existing residential homes or apartment complexes."[29]

These statements in the DEIR confirm that Alternative BS-2 and Alternative BS-3 are purely speculative and are not potentially feasible alternatives to the Proposed Project. An EIR is required to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.[30] An EIR is not required to consider alternatives that are infeasible, and

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[25] DEIR at 5-13.

[26] DEIR at 3-112.

[27] DEIR at 3-122.

[28] DEIR at 3-132.

[29] DEIR at 3-134.

[30] CEQA Guidelines, Cal. Code Regs., tit. 14, § 15126.6(a).

an EIR need examine in detail only those alternatives that "could feasibly attain most of the basic objectives of the project."[31]

For Alternative BS-2 and Alternative BS-3, there is no evidence in the record demonstrating that the theoretical FTM or BTM BESS systems are potentially feasible.[32] The Commission should find that Alternative BS-2 and Alternative BS-3 are remote and speculative because they are unlikely as a practical matter to be carried out within the reasonable future, and because they are contingent on the occurrence of uncertain future events such as future procurement activities that may or may not result in a sufficient addition of BESS to meet the distribution objective.[33] The DEIR acknowledges that "[i]t is not possible to identify with certainty FTM BESS sites that could be selected by PG&E in the future" and concedes that "site-specific analyses are speculative at this time."[34] Alternative BS-3 is even more speculative and is based upon the assumption that 17,000 customers could and would implement solar and battery storage, which would result in 88 megawatts ("MW") of solar and 125 MW/240 MWh of storage.[35] But there is no evidence presented in the DEIR that any of these potential customers would adopt these technologies, or where any such future facilities would be located: "Because it is unknown which specific customers will opt into the BTM resources program and install BTM resources on their property, the specific locations of activities under Alternative BS-3 are unknown."[36]

As a result, each of Alternative BS-2 and Alternative BS-3 fails the most basic CEQA standards. Both, as expressly admitted in the DEIR, are inherently speculative. There is no evidence the FTM or BTM batteries could or would be deployed, and even if there were, there is nothing more than pure speculation regarding where such batteries and related facilities might be

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[31] CEQA Guidelines, Cal. Code Regs., tit. 14, § 15126.6(f).

[32] CEQA defines "Feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." Pub. Resources Code § 21061.1; CEQA Guidelines, Cal. Code Regs., tit. 14, § 15364. The CEQA Guidelines enumerate which factors should be assessed: "Among the factors that may be taken into account when addressing feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects within a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." CEQA Guidelines, Cal. Code Regs., tit. 14, § 15126.6(f)(1), citing *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553 and *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1753, fn. 1.

[33] *See Al Larson Boat Shop Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 745; *Bowman v. City of Petaluma* (1986) 185 Cal.App.3d 1065, 1084.

[34] DEIR at 3-112.

[35] DEIR at 3-132.

[36] DEIR at 3-134.

deployed. The DEIR also acknowledges that deployment of the hypothetical is likely to occur over many years, demonstrating substantial delay in completion. A substantial delay could, by itself, render an alternative incapable of being "accomplished in a successful manner within a reasonable period of time," and hence infeasible.[37] As noted above, in the context of alternative locations for a project, the CEQA Guidelines recognize that another factor in the determination of feasibility is whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.[38] The DEIR lacks sufficient information and analysis regarding the potential environment impacts of Alternative BS-2 and Alternative BS-3. Selection of these two BESS alternatives as the environmentally superior distribution alternative therefore is not supported by substantial evidence.

F. Alternatives BS-2 and BS-3 also should be eliminated because they do not meet the Proposed Project's objective to ensure transmission and distribution reliability.

The CAISO designated the Proposed Project as a "reliability" project that is needed to mitigate thermal overloads and low voltage conditions in the Los Padres 70 kV system. The Proposed Project was identified in the CAISO's 2013-2014 Transmission Plan as a project needed to mitigate thermal overloads and voltage concerns in the Los Padres 70 kV system (specifically in the San Miguel, Paso Robles, Templeton, Atascadero, Cayucos, and San Luis Obispo areas). CAISO modeling determined that thermal overloads and very low voltage conditions, including voltage collapse in the area, could occur in this system following either one of two Category B1 contingencies: (1) loss of the Templeton 230 kV/70 kV #1 Transformer Bank; or (2) loss of the Paso Robles-Templeton 70 kV Transmission Line. If either the #1 Transformer Bank at the Templeton Substation or the 70 kV transmission line connecting the Paso Robles and Templeton Substations were to fail for any reason, that failure would result in dangerous overloading and low voltage conditions in the regional system.

This occurs due to both high load (*i.e.*, electrical service demand) in the Paso Robles area relative to substation capacity, and a lack of transmission redundancy in the system. Currently, the only sources of power to the Paso Robles Substation are the San Miguel-Paso Robles 70 kV Transmission Line from the north and the Paso Robles-Templeton 70 kV Transmission Line from the south, with the latter providing the bulk of the power and the nearest connection to a 230 kV power source. The San Miguel-Paso Robles 70 kV Transmission Line does not have the capacity to accommodate the load served through the Paso Robles Substation should the power source from Templeton Substation fail; therefore, thermal overloads, low voltages, and/or voltage collapse in the area could occur during one of the Category B contingencies identified by the CAISO. Because PG&E has an interim operational plan (an under-voltage load shedding scheme) that serves to protect the transmission system infrastructure in the event of such overload scenarios, load would

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[37] CEQA Guidelines, Cal. Code Regs., tit. 14, § 15364; *Bowman v. City of Petaluma*, *supra*, 185 Cal.App.3d at 1084 (condition of project approval requiring development of ring road that would result in long delay was infeasible).

[38] CEQA Guidelines, Cal. Code Regs., tit. 14, § 15126.6(f)(1).

be systematically dropped to bring voltages to acceptable levels. This operational plan could result in 60 to 70 MW of load in Paso Robles being dropped during one of the Category B contingencies described above.

The Proposed Project is designed to meet this CAISO-identified reliability need. The CAISO specified that: "As described in the ISO Functional Specification for the Estrella Substation project, the substation will address reliability issues in the Paso Robles area by providing Paso Robles Substation with more reinforced 70 kV sources from Templeton and Estrella Substations."[39] The CAISO's functional specifications explain that the Proposed Project would meet the reliability need as follows:

> The project will mitigate the thermal overloads and voltage concerns identified in the Los Padres 70 kV system, specifically in the San Miguel, Paso Robles, Templeton, Atascadero, Cayucos and San Luis Obispo areas following a Category B contingency due to loss of either the Templeton 230/70 kV #1 Bank or the Paso Robles-Templeton 70 kV Line. These two Category B contingencies put approximately 60-70 MW of load at Paso Robles at risk by activating the existing Paso Robles UVLS during summer peak conditions to alleviate the thermal and low voltage concerns. Also, a Category C3 contingency condition involving loss of Morro Bay-Templeton and Templeton-Gates 230 kV lines results in thermal overloads and low voltages in the underlying 70 kV system. With the additional source from the Gates 230 kV system, the Estrella Substation Project will provide robust system reinforcement to the Paso Robles and Templeton 70 kV system operations.[40]

Consistent with this fundamental reliability purpose, the Joint Application and PEA specified the following project objectives:

(1) **Reinforce Electrical Reliability by Implementing the CAISO-Approved Electrical Plan of Service.** Increase reliability and mitigate thermal overloads and voltage concerns in the area by having an additional 230 kV source of power that will increase service reliability in San Luis Obispo County, and maintain compliance with North American Electric Reliability Corporation reliability standards, as described in the *Estrella Substation Project Functional Specifications* issued by the CAISO in June 2014. The Proposed Project also is intended to allow Horizon West and PG&E to meet their obligation to add the

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[39] Joint Application, Exhibit H—CAISO Estrella Substation Project—Project Sponsor Selection Report at 2.

[40] Joint Application, Exhibit K—CAISO Estrella Substation Project Description and Functional Specifications for Competitive Solicitation at 2-3.

CAISO-approved project to the CAISO-controlled grid, as defined in the *Functional Specifications* and the Approved Project Sponsor Agreement.[41]

(2) **Meet Expected Future Electric Distribution Demand.** Provide a location for future 21 kV distribution facilities with a 230/70 kV source near the anticipated growth areas in northern Paso Robles to efficiently add distribution capacity and improve service reliability when required in the Paso Robles DPA.[42]

(3) **Balance Safety, Cost, and Environmental Impacts.** Locate, design, and build the project in a safe, cost-effective manner that will also minimize environmental impacts.[43]

The CAISO's updated studies confirm that the Proposed Project is still needed as soon as possible for reliability at the transmission and distribution level. The CAISO performed revised transmission planning studies for the 2017-2018 transmission planning process. The CAISO restudied the need for the Proposed Project in the near-term planning horizon using the 2019 and 2022 summer peak base cases used in the 2017-2018 transmission planning process with the Proposed Project removed from the model. The CAISO explained that the results "would be very similar in 2027" and explained:

> For the P1 (N-1) contingency, the reliability constraint is overloading of the Coalinga-San Miguel 60 kV and San Miguel Paso-Robles 60 kV lines as well as voltage collapse in the area.
>
> . . .
>
> The reliability studies are consistent with the current loading and reliability constraints in the area. . . . an outage of the Templeton-Paso Robles 60 kV will result in an overloading of the San Miguel-Paso Robles 60 kV lines in addition to voltage stability in the area. The loading on the Coalinga-San Miguel 60 kV line is the same as the San Miguel-Paso Robles 60 kV line and would also be overloaded. The interim operational action plan to address the reliability constraints in the area, until the Estrella Substation project is in-service, is to rely on an under voltage load shedding (UVLS) scheme that will trip load in the area that addresses the overload and voltage stability conditions under the P1 contingency condition.
>
> The Estrella Substation project was originally approved in the 2012-2013 transmission planning process to address the transmission reliability constraints identified above in addition to

[41] Joint Application at 7-8; PEA at 2-1; DEIR at 2-14.

[42] PEA at 2-2; DEIR at 2-14.

[43] Joint Application at 7-8; PEA at 2-2; DEIR at 2-14.

> the need PG&E has identified for a new load interconnection point for the distribution system in the area. The ISO has reviewed an alternative that would add an additional 230/70 kV transformer at the Templeton substation, reconstruction of the Templeton substation by PG&E, upgrades to the Paso Robles substation, and a new Templeton-Paso Robles 70 kV line. The alternative would address the transmission reliability constraints but at a higher estimated cost than the Estrella Substation Project and does not address the need identified by PG&E for a new load interconnection point for the distribution system in the area.[44]

In the DEIR, Commission staff developed its own project objectives and used those objectives "to inform the CEQA process/evaluation, including the development and screening of project alternatives."[45] The DEIR articulates those objectives as consisting of the following separate "Transmission Objective" and "Distribution Objective":

- **Transmission Objective:** Mitigate thermal overload and low voltage concerns in the Los Padres 70 kV system during Category B contingency scenarios, as identified by the CAISO in its 2013-2014 Transmission Plan.

- **Distribution Objective:** Accommodate expected future increased electric distribution demand in the Paso Robles DPA, particularly in the anticipated growth areas in northeast Paso Robles.[46]

In its Transmission Objective, the DEIR partly recognizes the reliability need, but fails to fully capture the nature of the reliability need, the objective for avoiding loss of load, and the fundamental dual transmission/distribution reliability objective served by adding a 230/70 kV substation to support the 70 kV system while also adding a new load interconnection point for the distribution system in the area. The DEIR also fails to recognize the need to increase service reliability at the distribution level as part of the "Distribution" objective. To the contrary, the DEIR specifies that: "The issue of long feeders and poor service reliability was not identified as a fundamental project objective by the CPUC; however, it is considered a beneficial effect of the Proposed Project."[47]

Omission of this reliability objective resulted in the DEIR's incorrect selection of two BESS alternatives—Alternative BS-2 and Alternative BS-3—as the distribution component of the

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[44] CAISO Letter from J.E. (Jeff) Billinton, Manager, Regional Transmission—North to Mr. Rob Peterson, Energy Division, Infrastructure Permitting and CEQA, California Public Utilities Commission (February 23, 2018) at 4-5.

[45] DEIR at 2-14.

[46] DEIR at 2-14 through 2-15.

[47] DEIR at 2-15.

environmentally superior alternative. A BESS alternative would not meet the reliability objective of the Proposed Project to "improve service reliability when required in the Paso Robles DPA."[48] The addition of BESS in lieu of upgrading the distribution system could, if they materialize, help address load growth. But BESS alone would not increase reliability of the distribution system. The BESSs cannot solve the issue of long feeders and poor service reliability that are one of the Proposed Project's objectives. A BESS alternative therefore would not meet the reliability objective of the Proposed Project to "improve service reliability when required in the Paso Robles DPA."[49] PG&E's comments on the DEIR provide a more detailed explanation of the problems associated with the BESS alternatives. In sum, Alternative BS-2 and Alternative BS-3 do not meet the key project objective of increasing reliability at the distribution level and should be eliminated in the FEIR.

III. CONCLUSION

Horizon West appreciates the opportunity to submit these comments and requests that the modifications described above and in **Attachment 1**, **Attachment 2**, and **Attachment 3** hereto be incorporated into the FEIR.

Very truly yours,

/s/ Lisa Cottle

Lisa Cottle
Winston & Strawn LLP
101 California Street
34th Floor
San Francisco, CA 94111
Telephone: (415) 591-1579
Email: lcottle@winston.com

/s/ Tracy C. Davis

Tracy C. Davis
NextEra Energy
Transmission, LLC
5920 W. William Cannon Dr.
Building 2
Austin, TX 78749
Telephone: (512) 236-3141
Email:
tracy.c.davis@nee.com

/s/ Scott Castro

Scott Castro
NextEra Energy
Transmission, LLC
One California Street
Suite 1600
San Francisco, CA 94111
Telephone: (415) 318-5919
Email: scott.castro@nee.com

Attorneys for Horizon West Transmission, LLC

Enclosed: Additional Documents Provided With This Letter:

Attachment 1	**Memorandum Regarding Minor Project Refinement**
Attachment 2	**Updated Project Description**
Attachment 3	**Detailed Comment Table**

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48 PEA at 2-2; DEIR at 2-14.

49 *Id.*

ATTACHMENT E

Errata to Attachment 3 (Detailed Comment Table) of HWT's DEIR Comments

Errata to Attachment 3 to the Comments of Horizon West Transmission, LLC on the Draft Environmental Impact Report for the Estrella Substation and Paso Robles Area Reinforcement Project

Introduction

Horizon West Transmission, LLC (HWT) is providing an errata to its comments on the Draft Environmental Impact Report (DEIR) for the Estrella Substation and Paso Robles Area Reinforcement Project (project). HWT's comments as revised in this errata provide minor revisions and clarifications to the text of the DEIR published by the CPUC on December 8, 2020. The minor text changes are within the scope of the analysis presented within the DEIR for the project. No new impacts are presented, and the significance conclusions identified in the DEIR will not be altered. In addition, the severity of impacts identified in the DEIR will not substantially increase. Therefore, the minor text changes do not substantially change any of the findings or conclusions of the DEIR and, therefore, do not constitute significant new information pursuant to CEQA Guidelines Section 15088.5.

Errata Items

The table on the following page provides the errata version of Attachment 3 to HWT's comments on the DEIR.

Errata Version of ATTACHMENT 3 to the
Comments of Horizon West Transmission, LLC on the Draft Environmental Impact Report for the
Proposed Estrella Substation and Paso Robles Area Reinforcement Project, December 2020
California State Clearinghouse No. 2018072071

Detailed Comment Table

Page #	DEIR Language	Horizon West Transmission Comments
EXECUTIVE SUMMARY		
ES-2	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level.	The maximum elevation of substation parcel is approximately 970 feet. Please revise text to read: Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 970~~608~~ feet above mean sea level.
ES-4	The 70 kV substation would be located immediately adjacent to the 230 kV substation within the same 15-acre site.	HWT is acquiring a 20-acre parcel Please revise text to read: The 70 kV substation would be located immediately adjacent to the 230 kV substation within the same 15-acre ~~site~~ area of the 20-acre site.
ES-4	Electrical equipment at the 230 kV substation would be located within a fenced area and would include breakers, breaker-and-a-half bays, operating buses, transformers, air break switches, insulated circuit breakers, dead-end steel structures, and lightning surge arresters.	Please revise text to read: Electrical equipment at the 230 kV substation would be located within an enclosed ~~fenced~~ area and would include breakers, breaker-and-a-half bays, operating buses, transformers, air break switches, insulated circuit breakers, dead-end steel structures, and lightning surge arresters.
ES-5	Ultimate buildout of the Estrella Substation could include an additional 230 kV interconnection, a second 230/70 kV transformer, three additional 70/21 kV transformers, and associated equipment (e.g., breakers, switches). The ultimate substation buildout would support additional distribution and power lines emanating from the Estrella Substation; however, the specific routes and lengths of these lines are not known at this time and are not evaluated in the DEIR.	Please revise text to read: Ultimate buildout of the Estrella Substation could include an additional 230 kV interconnection, a second 230/70 kV transformer, three additional 70/21 kV transformers, and associated equipment (e.g., breakers, switches). The ultimate substation buildout could also accommodate future inside-the-fence improvements, including the potential future construction of ballistic walls around the transformer or fire walls between the proposed 230 kV transformer and the additional 230 kV transformer. The ultimate substation buildout would support additional distribution and power lines emanating from the Estrella Substation; however, the specific routes and lengths of these lines are not known at this time and are not evaluated in the DEIR.

Page #	DEIR Language	Horizon West Transmission Comments
ES-6	Earthwork activities for the substation are anticipated to result in approximately 50,000 cubic yards of cut and fill, which would be balanced on the site to the extent feasible.	Please revise text to read: Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately ~~50,000~~ 68,000 cubic yards of cut and fill, balanced on site to the maximum extent possible. The cut and fill figure does not include approximately 16,500 cubic yards of topsoil which would be stripped and stockpiled during construction. Of the 16,500 cubic yards, about 4,000 cubic yards would be used on site, and the balance would be removed.
CHAPTER 1 - INTRODUCTION		
1-1	Per CEQA Guidelines section 15022, CEQA's basic purposes are to:	The applicable CEQA Guidelines section is15002. Please revise text to read: Per CEQA Guidelines section ~~1502~~215002, CEQA's basic purposes are to:
CHAPTER 2 - PROJECT DESCRIPTION		
2-4	Figure 2-1	The 500kV line is north of the 230 kV line, not south as currently depicted in the figure.
2-15	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level	Please revise text to read: Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 9~~6~~70 feet above mean sea level
2-15	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level.	The maximum elevation of substation parcel is approximately 970 feet. Revise text to read: Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 9~~6~~70 feet above mean sea level.
2-15	Estrella Substation would be located on an approximately 15-acre portion of a 98.6-acre parcel of land. This entire site is currently planted with grape vines of 10-foot-wide span lengths.	Estrella Substation would be located on an approximately 15 acres of a ~~15~~20-acre site. The site was created from ~~portion of~~ a 98.6-acre parcel of land. This entire 20-acre site ~~is~~ and the parcel of land are currently planted with grape vines of 10-foot-wide span lengths.
2-7	Figure 2-4	The 500kV line is north of the 230 kV line, not south as currently depicted in the figure.
2-21	Estrella Substation would be comprised of two separate and distinct substations on an approximately 15-acre site.	HWT is acquiring a 20-acre parcel. Please revise text to read: Estrella Substation would be comprised of two separate and distinct substations on ~~an~~ approximately 15 acres within a 20-acre site.

Page #	DEIR Language	Horizon West Transmission Comments
2-21	Access to the Estrella Substation site would be off of Union Road, along a new private access road. The access road would be paved up to the second entrance to the 70 kV substation (approximately 715 feet) and have an aggregate-surface up to the 230 kV substation access point and the 70 kV substation would have two separate access points	Please revise text to read: Access to the Estrella Substation site would be off of Union Road, along a new private access road. The access road would be paved up to the second entrance to the 70 kV substation (approximately 700~~15~~ feet) and have an aggregate-surface up to the 230 kV substation access point and the 70 kV substation would have two separate access points
2-22	Figure 2-7	Replace figure to include new substation parcel and update temporary and permanent disturbance areas
2-46	Figure 2-11	Replace figure with new substation layout
2-47	Figure 2-12	Replace figure with new substation layout
2-48	Figure 2-13	Replace figure with new substation layout
2-49	The fenced portion of the 230 kV substation would be approximately 4 acres in size. An approximately 7-foot-tall chain-link fence with an additional 1 foot of barbed wire would be installed around the remaining perimeter of the 230 kV substation.	Please revise text to read: The fenced portion of the 230 kV substation would be approximately 4 acres in size. A~~n approximately 7-foot-tall~~ chain-link fence, a minimum of 7 feet tall, with an additional 1 foot of barbed wire would be installed around the remaining perimeter of the 230 kV substation.
2-56	The equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation. The anticipated layout of the Estrella Substation at ultimate buildout is shown in Figure 2-18. The additional 230/70 kV transformer under ultimate buildout is assumed to include the same amount of mineral oil (16,000 to 18,000 gallons) as described for the Proposed Project (see Section 2.3.1), and the same secondary containment structure (i.e., designed to allow sufficient freeboard to include the oil volume of the transformer plus the precipitation from a 25-year, 24-hour storm event). The additional 230 kV interconnection is assumed to include similar structures (LSTs) and follow a similar interconnection process to that described for the Proposed Project in Section 2.3.1 under the header for “230 kV Transmission Interconnection.” The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.	Please revise text to read: The equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation. The anticipated layout of the Estrella Substation at ultimate buildout is shown in Figure 2-18. The additional 230/70 kV transformer under ultimate buildout is assumed to include the same amount of mineral oil (16,000 to 18,000 gallons) as described for the Proposed Project (see Section 2.3.1), and the same secondary containment structure (i.e., designed to allow sufficient freeboard to include the oil volume of the transformer plus the precipitation from a 25-year, 24-hour storm event). The additional 230 kV interconnection is assumed to include similar structures (LSTs) and follow a similar interconnection process to that described for the Proposed Project in Section 2.3.1 under the header for “230 kV Transmission Interconnection.” The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.
2-57	The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.	Please revise text as follows: The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.
2-59	Figure 2-18	Replace figure with new substation layout

Page #	DEIR Language	Horizon West Transmission Comments
2-61	An affiliate of HWT has an option agreement to purchase the approximately 15-acre portion of this parcel. Prior to construction, HWT would purchase and hold fee title of this approximately 15-acre area.	Please revise text to read: An affiliate of HWT has an option agreement to purchase the approximately ~~15~~-20 acre portion of this parcel. Prior to construction, HWT would purchase and hold fee title of this approximately ~~15~~20-acre area. ~~This~~ The 15-acre substation footprint would be located entirely within the 20-acre parcel ~~area ~~,and ~~is~~ adequate to accommodate the entire substation facility including all considerations for site grading, equipment laydown and storage, fencing, access and internal circulation, spill and stormwater management, and other operational considerations.
2-63	Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately 50,000 cubic yards of cut and fill, balanced on site to the maximum extent possible.	Please revise text to read: Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately ~~50,000~~ 68,000 cubic yards of cut and fill, balanced on site to the maximum extent possible. The cut and fill figure does not include approximately 16,500 cubic yards of topsoil which would be stripped and stockpiled during construction. Of the 16,500 cubic yards, about 4,000 cubic yards would be used on site, and the balance would be removed.
2-64	Access road construction would begin by excavating a maximal depth of 7 feet at the intersection with Union Road, tapering off to 2 feet deep for the remainder of the road.	The least amount of excavation (approximately 2 feet) will occur at the connection to Union Road. The greatest amount of excavation (approximately 17 feet) will be in the area just past the second entrance to the PG&E 70kV yard. Please revise text to read: Access road construction would begin by excavating ~~a maximal~~ to a depth of approximately ~~7~~2 feet at the intersection with Union Road, ~~tapering off~~ increasing to ~~2~~17 feet deep for the remainder of the road.
2-64	Next, the road would be graded and compacted in accordance with engineering standards and geotechnical requirements. Following initial compaction, approximately 15,000 cubic yards of road base would be imported, distributed on site, and final compacted.	Please revise text to read: Next, the road would be graded and compacted in accordance with engineering standards and geotechnical requirements. Following initial compaction, ~~approximately 15,000 cubic yards of~~ road base would be imported, distributed on site, and final compacted.
2-73	Table 2-9. Total Approximate Area (acres)—6.20	Please revise text to read: Total Approximate Area (acres)—~~6.20~~0.2
2-74 & 2-75	The two staging areas supporting construction of the substation, totaling 1.9 acres, would be located entirely within the 15-acre permanent disturbance area.	Please revise text to read: The two Estrella Substation staging areas supporting construction of the substation, totaling approximately 1.9 acres, would be located entirely within the 15-acre permanent disturbance area.

Page #	DEIR Language	Horizon West Transmission Comments
2-77	Permanent and construction access to the proposed substations would be immediately off Union Road on a new private access road. The main access road would be paved and measure about 1,100 feet long and about 20 feet wide.	Please revise text to read: Permanent and construction access to the proposed substations would be immediately off Union Road on a new private access road. The main access road would be paved and measure about 1,~~1~~700 feet long and about 20 feet wide.
2-78	Construction would typically occur 6 days per week (Monday through Saturday) throughout the duration of construction.	Please revise text to read: Construction would typically occur 6 days per week (Monday through Saturday) throughout the duration of construction, although water trucks may be operated on Sundays for fugitive dust control in compliance with the Construction Activity Management Plan.
2-88	Table 2-11. Anticipated Permits and Approvals and Applicable Regulatory Requirements.	Some equipment, such as the 230/70kV transformer and the control house, may require Caltrans Transportation Permit for transporting oversize/overweight equipment. As such, please revise Table 2-11 to include Caltrans Transportation Permits.
CHAPTER 3 – ALTERNATIVES DESCRIPTION		
3-4	The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (approximately 15,290 gallons) as the Proposed Project.	The proposed Estrella substation would use between 16,000 to 18,000 gallons of mineral oil. Please revise text to read: The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (between approximately ~~15,290~~ 16,000-18,000 gallons) as the Proposed Project.
3-91	The quantity of mineral oil to be used for transformers for Alternative SE-1A would be the same (approximately 15,290 gallons) as the Proposed Project.	The proposed Estrela substation would use between 16,000 to 18,000 gallons of mineral oil. Please revise text to read: The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (between approximately ~~15,290~~ 16,000-18,000 gallons) as the Proposed Project.
CHAPTER 4 – ENVIRONMENTAL ANALYSIS **AESTHETICS**		
4.1-3	The proposed Estrella Substation site occupies an approximately 15-acre area to the north of Union Road.	HWT is acquiring a 20-acre parcel. Please revise text to read: The proposed Estrella Substation site occupies ~~an~~ approximately 15 acres of a 20-acre site to the north of Union Road.

Page #	DEIR Language	Horizon West Transmission Comments
4.1-39	Construction of the new substation would occur on a 15-acre parcel adjacent to Union Road.	HWT is acquiring a 20-acre parcel. Please revise text to read: Construction of the new substation would occur on approximately 15 acres within a 20-acre parcel adjacent to Union Road.
4.1-46	General comment regarding SS-1 analysis	The analysis does not adequately consider permanent impacts to the visual character. SS-1 would be sited directly adjacent to the Estrella River. While the viewer concern and exposure may in fact be lower at this site than the Estrella site, the analysis undervalues the visual sensitivity of this scenic area and neglects consideration of the substantial degree that this substation would contrast with and dominate the landscape from an aesthetics perspective.
4.1-50	This alternative site would result in less adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is already characterized by electrical infrastructure.	Average daily traffic is greater along El Pomar Drive than along Union Road adjacent to the proposed substation. Therefore, viewer exposure would be greater than the Estrella substation. Additionally, the interconnection line would be longer than the interconnection line for the Estrella substation. While it is true that the substation expansion area is directly adjacent to an existing substation, the expanded substation would be constructed on undeveloped land and would require the removal of oak trees and other vegetation. As such, the visual dominance of the substation would increase. For these reasons, aesthetic impacts would be similar to the Estrella substation. Please revise text to read: This alternative site would result in ~~less~~ similar adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is already characterized by electrical infrastructure.
4.1-50	Development of the substation at the Bonel Ranch site would substantially alter the visual character of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities.	The analysis under criterion B never identifies that impacts would be significant, contrary to the proposed Estrella substation and Alternative SE-1A. Please revise text to read: Development of the substation at the Bonel Ranch site would substantially alter the visual character or quality of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities, which would be a significant impact.
AGRICULTURE AND FORESTRY RESOURCES		
4.2-14	As described in the PEA, based on the utility exemption in the Williamson Act, the approximately 15-acre substation site would be created as a separate legal parcel and removed from the larger 98-acre Williamson Act contract.	HWT is acquiring a 20-acre parcel. Please revise text to read: As described in the PEA, based on the utility exemption in the Williamson Act, the approximately ~~15~~20-acre substation site would be created as a separate legal parcel and removed from the larger 98-acre Williamson Act contract.

Page #	DEIR Language	Horizon West Transmission Comments
4.2-15	Therefore, the reduction of the current 98-acre Williamson Act parcel down to 83 acres would not disqualify the proposed 15-acre substation parcel as an agricultural preserve according to San Luis Obispo County.	HWT is acquiring a 20-acre parcel. Please revise text to read: Therefore, the reduction of the current 98-acre Williamson Act parcel down to 83 acres would not disqualify the proposed ~~15~~20-acre substation parcel as an agricultural preserve according to San Luis Obispo County.
4.2-15	However, placing the substation within the existing parcel under Williamson Act contract would conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use.	California Government Code §51238 states that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Further, as noted in the DEIR, removing the proposed substation parcel from the 98-acre Williamson Act would not disqualify the remaining contracted area from an agricultural preserve. The remaining land under the modified contract will continue to be cultivated and will limit land uses to compatible uses as outlined by the County's Rules of Procedure, and the remaining parcel will exceed the 40-acre minimum parcel size specified in the original contract. As such, HWT disagrees with the conclusion that placing the substation within the existing parcel under Williamson Act contract would conflict with the Williamson Act contract. Please revise text to read: ~~However, p~~ Placing the substation within the existing parcel under Williamson Act contract would not conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use, because Government Code Section 51238 specifies that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Removing the proposed substation parcel from the 98-acre Williamson Act would not disqualify the remaining contracted area from an agricultural preserve, and the remaining parcel will exceed the 40-acre minimum parcel size specified in the original contract.
4.2-17	The Bonel Ranch parcel is not under a Williamson Act contract; therefore, there would be no potential to conflict with a Williamson Act contract. As a result, impacts under significance criterion B would be less than significant	According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. Please revise text to read: The Bonel Ranch parcel is ~~not under~~ subject to a Williamson Act contract; therefore, placing the substation within the existing parcel under Williamson Act contract would conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use to the same extent as the Proposed Project.

Page #	DEIR Language	Horizon West Transmission Comments
AIR QUALITY		
4.3-17	Even with the implementation of APM measures, construction-related ROG and NOX emissions threshold exceedances would be considered a significant impact. Mitigation Measure AIR-1 is proposed to reduce potentially significant impacts, requiring implementation of SLOCAPCD standard mitigation measures, BACT, and preparation of a site-specific CAMP that must be reviewed and approved by the APCD prior to the start of construction. The CAMP would be a comprehensive document that captures all pollutant emission reduction measures to be implemented for the approved project. Approval by the APCD would ensure all feasible and appropriate mitigation measures have been incorporated.	Construction related emissions following implementation of APM-1 through APM-3 and Mitigation Measure AIR-1 were not estimated in the EIR. Mitigated emissions should be estimated to support this finding.
BIOLOGICAL RESOURCES		
4.4-9	Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be "rare, threatened, or endangered in California" (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected in California.	The applicable CFGC section should be referenced. Please revise text to read: Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be "rare, threatened, or endangered in California" (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected ~~in California.~~ under California Fish and Game Code Section 3503 *et seq.*

Page #	DEIR Language	Horizon West Transmission Comments
4.4-42	Crotch's bumble bee, which utilize rodent burrows, tufts of grass, old bird nests on the ground, rock piles, or cavities in dead trees for nest construction, has potential to occur within the Proposed Project area. Direct impacts to Crotch's bumble bee could occur if rodent burrows within the Proposed Project disturbance area were utilized as nests and destroyed through construction activities. Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally, implementation of APMs BIO-3 and GEN-1 would further reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals identified during pre-construction surveys or during the course of construction activities.	While preconstruction surveys would help avoid and minimize impacts to special-status species, surveying rodent burrows for the state candidate endangered Crotch's bumblebee within the project footprint is impracticable due to the abundance of burrow systems and absence of protocol survey guidance for identification of nest colonies. Current review of iNaturalist (https://www.inaturalist.org/taxa/271451-Bombus-crotchii accessed: January 4, 2021) show observation of the species occurring south and southeast of Santa Maria. The document recognizes the potential of species occurrence in the region, but little is known about its current distribution, hibernacula, or overwintering sites, and direct impacts cannot be adequately concluded due to the lack of this information. Applicants are required to follow all provisions of CESA in regard to California candidate or listed species, but are not specifically required to "notify and coordinate with CDFW" on any candidate or listed species identified during pre-construction surveys. Please revise text to read: ~~Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally,~~ Implementation of APMs BIO-3 and GEN-1 would ~~further~~ reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to follow all provisions of CESA in regard to California candidate or listed species ~~notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals~~ identified during ~~pre-construction surveys or during~~ the course of construction activities.
4.4-44	Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts would be significant.	Please revise text to read: Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts may be ~~would be~~ significant.

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GEOLOGY, SOILS, SEISMICITY, AND PALEONTOLOGICAL RESOURCES		
4.7-35	Further, design and construction requirements in G.O. 95 and 174, as well as the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils, ensuring the potential for such impacts would be less than significant.	G.O. 95 does not apply to substations. Please revise text to read: Further, design and construction requirements in G.O. ~~95 and~~ 174~~, as well as~~ and the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils, ensuring the potential for such impacts would be less than significant.
HAZARDS AND HAZARDOUS MATERIALS		
4.9-7	Estrella Substation would be located on approximately 15 acres of land that is currently under agricultural cultivation as a vineyard.	HWT is acquiring a 20-acre parcel. Please revise text to read: Estrella Substation would be located on approximately 20 acres that is currently under agricultural cultivation as a vineyard.
LAND USE AND PLANNING		
4.11-2	The substation would be constructed on an approximately 15-acre site, carved out of a 98-acre parcel of land designated as agriculture and currently being used as a vineyard (one of five contiguous parcels operated by Steinbeck Vineyards & Winery).	HWT is acquiring a 20-acre parcel. Please revise text to read: The substation would be constructed on an approximately 15 acres within a 20-acre site, carved out of a 98-acre parcel of land designated as agriculture and currently being used as a vineyard (one of five contiguous parcels operated by Steinbeck Vineyards & Winery).

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PUBLIC SERVICES		
4.15-11	Therefore, the Proposed Project would not require the construction of new or expanded school facilities, which could result in substantial adverse physical environmental effects. This impact would be less than significant.	The project would not directly or indirectly induce population growth and would not require the relocation of non-local construction workers given the limited nature of construction activities. Therefore, there is no basis for the less than significant determination on schools and this impact should be changed to no impact, as described in the PEA. Please revise text to read: Therefore, the Proposed Project would not require the construction of new or expanded school facilities, which could result in substantial adverse physical environmental effects. ~~This impact would be less than significant.~~ No impact would occur.
TRANSPORTATION		
4.17-23	The number of construction vehicle trips and the frequency of the trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3).	Construction of BS-1 will be longer in duration than the propped Estrella substation. Therefore, construction related effects would last longer. Please revise text to read: The number of construction vehicle trips and the frequency of the trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3). However, the effects of construction related transportation impacts would last longer due to the longer construction schedule for Alternative SS-1.
4.17-27	The number of construction vehicle trips and the frequency of the trips for Alternative SE-1A is estimated to be the same as for the Proposed Project (see Table 4.17-3).	Construction of SE-1A will be longer in duration than the propped Estrella substation. Therefore, construction related effects would last longer. Please revise text to read: The number of construction vehicle trips and the frequency of the trips for Alternative SE-1A is estimated to be the same as for the Proposed Project (see Table 4.17-3). However, the effects of construction related transportation impacts would last longer due to the longer construction schedule for Alternative SS-1.
WILDFIRE		
4.20-5	The proposed Estrella Substation would be located on approximately 15 acres of land within an existing vineyard.	HWT is acquiring a 20-acre parcel. Please revise text to read: The proposed Estrella Substation would be located on approximately 15 acres within a 20 acre~~s of land~~ site within an existing vineyard.

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	Construction and operation of the reasonably foreseeable distribution components, including installation of the 21/12 kV pad-mounted transformer, and ultimate buildout of Estrella Substation, would not be expected to substantially exacerbate wildfire risks, such that people would be exposed to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, and/or people or structures would be exposed to significant risks (e.g., downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes.) Construction and operation activities would be on a much smaller scale than that of the Proposed Project, and similar to the Proposed Project, would occur within areas under irrigated agriculture cultivation (generally a low fire risk land use) or road rights-of-way. Construction and operation activities would comply with the PRC wildland fire safety requirements for grass- and brush-covered lands, as well as the California Fire Code. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would need to comply with applicable vegetation clearance requirements (see Section 4.20.2; fire prevention standards for electric utilities) and would not be located in high fire risk areas or the SRA (apart from one pad-mounted transformer that would be located on the border of the SRA). Therefore, impacts under significance criteria B and D would be less than significant.	Please revise text to read: Construction and operation of the reasonably foreseeable distribution components, including installation of the 21/12 kV pad-mounted transformer, and ultimate buildout of Estrella Substation, would not be expected to substantially exacerbate wildfire risks, such that people would be exposed to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, and/or people or structures would be exposed to significant risks (e.g., downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes.) Construction and operation activities would be on a much smaller scale than that of the Proposed Project, and similar to the Proposed Project, would occur within areas under irrigated agriculture cultivation (generally a low fire risk land use) or road rights-of-way. Construction and operation activities would comply with the PRC wildland fire safety requirements for grass- and brush-covered lands, as well as the California Fire Code. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would need to comply with applicable vegetation clearance requirements (see Section 4.20.2; fire prevention standards for electric utilities) and would not be located in high fire risk areas or the SRA (apart from one pad-mounted transformer that would be located on the border of the SRA). Therefore, impacts under significance criteria B and D would be less than significant.
CHAPTER 5 – ALTERNATIVES ANALYSIS SUMMARY AND COMPARISON OF ALTERNATIVES		
5-11	Additionally, while the Bonel Ranch site is currently in agricultural use (alfalfa production), it is not on land classified as one of the protected categories of Important Farmland under CEQA (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland); thus, placing the substation at this location would reduce the Proposed Project's significant impacts on agriculture resources.	According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. Please revise text to read: Additionally, while the Bonel Ranch site is currently in agricultural use (alfalfa production) and is subject to Williamson Act contract, it is not on land classified as one of the protected categories of Important Farmland under CEQA (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland); thus, placing the substation at this location would reduce the Proposed Project's significant impacts on agriculture resources.
CHAPTER 6 – OTHER STATUTORY CONSIDERATIONS AND CUMULATIVE IMPACTS		
6-13	Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant on their own.	This statement conflicts with the findings from the Aesthetics analysis. As described therein, the DEIR found significant impacts for SS-1, PLR-1A, and PLR-1C. Mitigation was identified to reduce impacts to less than significant. As such, these alternatives are not less than significant on their own. Please revise text to read: Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant with implementation of mitigation ~~on their own.~~

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6-21	None of the other alternatives, nor the reasonably foreseeable distribution components, would significantly affect agricultural resources at the project level.	According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. The cumulative analysis should be revised to account for this impact.
APPENDIX F — MMRP		
MM AES-1	HWT and PG&E shall implement the following measures: • Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation. For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk. • At the substation, incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown) in order to minimize visual contrast.	The 230 kV yard would be most visible to motorists along its southeastern perimeter fronting Union Road. As such, the measure should be revised to limit the installation of chain link fence slats to this portion of the substation's perimeter. Please revise text to read: HWT and PG&E shall implement the following measures: • Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation. For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk. • At the substation's southeastern perimeter fronting Union Road, incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown) in order to minimize visual contrast.

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MM AG-1	HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall contribute sufficient funds (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements. The amount of HWT's and PG&E's contribution shall ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.	As explained in more detail in HWT's comment letter, MM AG-1 needs to be revised to allow HWT and PG&E to utilize other comparable mitigation measures that would achieve conservation easements for important farmland, such as through agreements with landowners to establish and record a conservation easement, or through contributions to a local agency to achieve the agricultural land conservation MM AG-1 also needs to be revised to recognize that PG&E and HWT will have different contribution amounts that are based on their respective impacts to Important Farmland. For these reasons, please revise the text to read: HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall finalize and effectuate any combination of the following as long as the total acreage in the aggregate equals the amount required by the conservation ratio specified below: either (1) contribute ~~sufficient~~ funds, in an amount equal to the fair market value (determined as of the date construction commenced) of each acre for which the contribution is made, ~~(i.e., adequate to support the conservation ratio described below)~~ to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives, or to another public agency or non-profit organization able to achieve long-term preservation of agricultural lands in San Luis Obispo County; and/or (2) enter into and record one or more conservation easements with landowners for specific farmland in San Luis Obispo County. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements and is one potential recipient of any contribution in clause (1) above. The acreage for which ~~amount of~~ HWT's and PG&E's contributions are made in clause (1) above, together with any acreage preserved through recorded conservation easements in clause (2) above, shall equal a minimum total ~~ensure the conservation~~ of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by their respective components associated with the Proposed Project or alternatives~~, based on the market price for the commensurate agricultural land at the time that the impacts occur~~.
APM BIO-1.	Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants	The title of APM BIO-1 does not match the title of APM BIO-1 in Table ES-1 and Table 2-12. Please revise text to read: Table F-1: APM BIO-1. ~~Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants~~ Conduct Pre-Construction Survey(s) for Special-Status Species and Sensitive Resource Areas

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MM BIO-1	Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.	Please revise text to read: Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all uncovered and unfenced steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.
MM BIO-1	Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies throughout the duration of the ground-disturbing and vegetation-removal construction phase.	Reports will be submitted to the to the CPUC only since no permits are held with regulatory agencies. Please revise text to read: Weekly biological construction monitoring reports shall be prepared and submitted to the CPUC ~~appropriate permitting and responsible agencies~~ throughout the duration of the ground-disturbing and vegetation-removal construction phase.
MM BIO-1	Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction. Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.	Gravel bags and erosion and sediment controls would be implemented per the SWPPP. Further, the project has been designed to avoid impacts to wetlands and/or waters of the state as per HYDRO-1. In addition, indirect effects to wetlands and/or riparian areas present along and within the project (e.g., discharge of sediment and pollutants, fugitive dust) would be minimized through implementation of APMs HYDRO-1, HAZ-1, GEN-1, and AIR-3. Please revise text to read: ~~Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction.~~ Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.
APM BIO-2	If work is scheduled during the nesting season (January 15 through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).	Standard nesting season dates are March 1st through August 15th or 31st; occasionally starting as early as February 1st. January 15th is still in winter timeframes with only select species such as golden eagles beginning to nest. As such, the January 15 nesting season restriction should only apply to golden eagles. Please revise text to read: If work is scheduled during the nesting season (commencing January 15 for golden eagle and February 1 for all other birds through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).

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MM BIO-2	If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness.	The substation site is an active vineyard with very low potential to support special-status plant species. This measure should not apply to HWT. Please revise text to read: If avoidance of special-status plants is not feasible, ~~HWT and~~ PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness.
MM BIO-3	Operational construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible. If infeasible, HWT and PG&E shall retain a CPUC-approved biologist to conduct a nesting bird survey of the surrounding 500-foot area to determine if any active nest is present. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If operational construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.	Please revise text to read: ~~Operational c~~Construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible. If infeasible, HWT and PG&E shall retain a CPUC-approved biologist to conduct a nesting bird survey of the surrounding 500-foot area to determine if any active nest is present. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If ~~operational~~ construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.
MM BIO-4	HWT, PG&E, and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat.	The substation will not impact blue oak woodland habitat. This measure should apply to PG&E components only. Please revise text to read: ~~HWT,~~ PG&E and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat.
MM GEO-1	HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017). These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.	Please revise text to read: HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017), including any subsequent addendums to such reports. These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.

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MM NOI-1	Mitigation Measure NOI-1: General Construction Noise.	The DEIR on page 4.13-18 states that “ground-level construction noise from the Proposed Project would not be significant given: (1) the limited number of noise-sensitive receptors in proximity to much of the Proposed Project; (2) the relatively rapid attenuation of even the loudest pieces of construction equipment with distance from the source, and (3) the impacts would be temporary and occur over a relatively short duration at individual structure locations or segments of the 70 kV power line alignment (as opposed to work occurring along the entire alignment simultaneously).” However, the DEIR states that Mitigation Measure MM NOI-1 is applicable to all construction activities. Because the DEIR concluded that ground level construction activities would result in less than significant impacts, MM NOI 1 should not apply to ground-level construction activities. APM NOI-1 and APM NOI-2 would further reduce already less than significant ground-level construction noise.

ATTACHMENT F

Redline Version of the Errata to Attachment 3 (Detailed Comment Table) of HWT's DEIR Comments

Errata to Attachment 3 to the Comments of Horizon West Transmission, LLC on the Draft Environmental Impact Report for the Estrella Substation and Paso Robles Area Reinforcement Project

Introduction

Horizon West Transmission, LLC (HWT) is providing an errata to its comments on the Draft Environmental Impact Report (DEIR) for the Estrella Substation and Paso Robles Area Reinforcement Project (project). HWT's comments as revised in this errata provide minor revisions and clarifications to the text of the DEIR published by the CPUC on December 8, 2020. The minor text changes are within the scope of the analysis presented within the DEIR for the project. No new impacts are presented, and the significance conclusions identified in the DEIR will not be altered. In addition, the severity of impacts identified in the DEIR will not substantially increase. Therefore, the minor text changes do not substantially change any of the findings or conclusions of the DEIR and, therefore, do not constitute significant new information pursuant to CEQA Guidelines Section 15088.5.

Errata Items

The table on the following page provides the errata version of Attachment 3 to HWT's comments on the DEIR.

Errata Version of ATTACHMENT 3 to the
Comments of Horizon West Transmission, LLC on the Draft Environmental Impact Report for the
Proposed Estrella Substation and Paso Robles Area Reinforcement Project, December 2020
California State Clearinghouse No. 2018072071

Detailed Comment Table

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EXECUTIVE SUMMARY		
ES-2	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level.	The maximum elevation of substation parcel is approximately 970 feet. Please revise text to read: Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 970~~608~~ feet above mean sea level.
ES-4	The 70 kV substation would be located immediately adjacent to the 230 kV substation within the same 15-acre site.	HWT is acquiring a 20-acre parcel Please revise text to read: The 70 kV substation would be located immediately adjacent to the 230 kV substation within the same 15-acre ~~site~~ area of the 20-acre site.
ES-4	Electrical equipment at the 230 kV substation would be located within a fenced area and would include breakers, breaker-and-a-half bays, operating buses, transformers, air break switches, insulated circuit breakers, dead-end steel structures, and lightning surge arresters.	Please revise text to read: Electrical equipment at the 230 kV substation would be located within an enclosed ~~fenced~~ area and would include breakers, breaker-and-a-half bays, operating buses, transformers, air break switches, insulated circuit breakers, dead-end steel structures, and lightning surge arresters.
ES-5	Ultimate buildout of the Estrella Substation could include an additional 230 kV interconnection, a second 230/70 kV transformer, three additional 70/21 kV transformers, and associated equipment (e.g., breakers, switches). The ultimate substation buildout would support additional distribution and power lines emanating from the Estrella Substation; however, the specific routes and lengths of these lines are not known at this time and are not evaluated in the DEIR.	Please revise text to read: Ultimate buildout of the Estrella Substation could include an additional 230 kV interconnection, a second 230/70 kV transformer, three additional 70/21 kV transformers, and associated equipment (e.g., breakers, switches). The ultimate substation buildout could also accommodate future inside-the-fence improvements, including the potential future construction of ballistic walls around the transformer or fire walls between the proposed 230 kV transformer and the additional 230 kV transformer. The ultimate substation buildout would support additional distribution and power lines emanating from the Estrella Substation; however, the specific routes and lengths of these lines are not known at this time and are not evaluated in the DEIR.
ES-6	Earthwork activities for the substation are anticipated to result in approximately 50,000 cubic yards of cut and fill, which would be balanced on the site to the extent feasible.	Please revise text to read: Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately ~~50,000~~ 68,000 cubic yards of cut and fill, balanced on site to the maximum extent possible. ~~Approximately~~The cut and fill figure does not include approximately 16,500 cubic yards of topsoil which would be stripped and

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		stockpiled ~~and approximately~~during construction. Of the 16,500 cubic yards, about 4,000 cubic yards ~~of the stockpiled topsoil~~ would be used ~~during restoration~~on site, ~~with~~and the balance would be removed ~~from the site~~.
CHAPTER 1 - INTRODUCTION		
1-1	Per CEQA Guidelines section 15022, CEQA's basic purposes are to:	The applicable CEQA Guidelines section is15002. Please revise text to read: Per CEQA Guidelines section ~~15022~~15002, CEQA's basic purposes are to:
CHAPTER 2 - PROJECT DESCRIPTION		
2-4	Figure 2-1	The 500kV line is north of the 230 kV line, not south as currently depicted in the figure.
2-15	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level	Please revise text to read: Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 9~~6~~70 feet above mean sea level
2-15	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level.	The maximum elevation of substation parcel is approximately 970 feet. Revise text to read: Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 9~~6~~70 feet above mean sea level.
2-15	Estrella Substation would be located on an approximately 15-acre portion of a 98.6-acre parcel of land. This entire site is currently planted with grape vines of 10-foot-wide span lengths.	Estrella Substation would be located on an approximately 15 acres of a ~~15~~20-acre site. The site was created from ~~portion of~~ a 98.6-acre parcel of land. This entire 20-acre site ~~is~~ and the parcel of land are currently planted with grape vines of 10-foot-wide span lengths.
2-7	Figure 2-4	The 500kV line is north of the 230 kV line, not south as currently depicted in the figure.
~~2-20~~	~~Permanent ground disturbance for Estrella Substation is approximately 15 acres, including the area that would be permanently disturbed outside of the 230 kV and 70 kV substation fence lines.~~	~~HWT is acquiring a 20-acre parcel.~~ ~~Please revise text to read:~~ ~~Permanent ground disturbance for Estrella Substation is approximately 15 20 acres, including the area that would be permanently disturbed outside of the 230 kV and 70 kV substation fence lines.~~
2-21	Estrella Substation would be comprised of two separate and distinct substations on an approximately 15-acre site.	HWT is acquiring a 20-acre parcel. Please revise text to read: Estrella Substation would be comprised of two separate and distinct substations on ~~an~~ approximately 15 acres within a 20-acre site.
2-21	Access to the Estrella Substation site would be off of Union Road, along a new private access road. The access road would be paved up to the second entrance to the 70 kV	Please revise text to read:

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	substation (approximately 715 feet) and have an aggregate-surface up to the 230 kV substation access point and the 70 kV substation would have two separate access points	Access to the Estrella Substation site would be off of Union Road, along a new private access road. The access road would be paved up to the second entrance to the 70 kV substation (approximately 700~~15~~ feet) and have an aggregate-surface up to the 230 kV substation access point and the 70 kV substation would have two separate access points
2-22	Figure 2-7	Replace figure to include new substation parcel and update temporary and permanent disturbance areas
2-46	Figure 2-11	Replace figure with new substation layout
2-47	Figure 2-12	Replace figure with new substation layout
2-48	Figure 2-13	Replace figure with new substation layout
2-49	The fenced portion of the 230 kV substation would be approximately 4 acres in size. An approximately 7-foot-tall chain-link fence with an additional 1 foot of barbed wire would be installed around the remaining perimeter of the 230 kV substation.	Please revise text to read: The fenced portion of the 230 kV substation would be approximately 4 acres in size. A~~n approximately 7 foot tall~~ chain-link fence, a minimum of 7 feet tall, with an additional 1 foot of barbed wire would be installed around the remaining perimeter of the 230 kV substation.
2-56	The equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation. The anticipated layout of the Estrella Substation at ultimate buildout is shown in Figure 2-18. The additional 230/70 kV transformer under ultimate buildout is assumed to include the same amount of mineral oil (16,000 to 18,000 gallons) as described for the Proposed Project (see Section 2.3.1), and the same secondary containment structure (i.e., designed to allow sufficient freeboard to include the oil volume of the transformer plus the precipitation from a 25-year, 24-hour storm event). The additional 230 kV interconnection is assumed to include similar structures (LSTs) and follow a similar interconnection process to that described for the Proposed Project in Section 2.3.1 under the header for "230 kV Transmission Interconnection." The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.	Please revise text to read: The equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation. The anticipated layout of the Estrella Substation at ultimate buildout is shown in Figure 2-18. The additional 230/70 kV transformer under ultimate buildout is assumed to include the same amount of mineral oil (16,000 to 18,000 gallons) as described for the Proposed Project (see Section 2.3.1), and the same secondary containment structure (i.e., designed to allow sufficient freeboard to include the oil volume of the transformer plus the precipitation from a 25-year, 24-hour storm event). The additional 230 kV interconnection is assumed to include similar structures (LSTs) and follow a similar interconnection process to that described for the Proposed Project in Section 2.3.1 under the header for "230 kV Transmission Interconnection." The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.
2-57	The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.	Please revise text as follows: The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.
2-59	Figure 2-18	Replace figure with new substation layout
2-61	An affiliate of HWT has an option agreement to purchase the approximately 15-acre portion of this parcel. Prior to construction, HWT would purchase and hold fee title of this approximately 15-acre area.	Please revise text to read: An affiliate of HWT has an option agreement to purchase the approximately ~~15~~ 20 acre portion of this parcel. Prior to construction, HWT would purchase and hold fee title of this approximately ~~15~~20-acre area. ~~This~~ The 15-acre substation footprint would be located entirely within the 20-acre parcel ~~area~~ , and is adequate to accommodate the entire

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		~~approximately 15 acre~~ substation facility including all considerations for site grading, equipment laydown and storage, fencing, access and internal circulation, spill and stormwater management, and other operational considerations.
2-63	Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately 50,000 cubic yards of cut and fill, balanced on site to the maximum extent possible.	Please revise text to read: Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately ~~50,000~~ 68,000 cubic yards of cut and fill, balanced on site to the maximum extent possible. ~~Approximately~~The cut and fill figure does not include approximately 16,500 cubic yards of topsoil which would be stripped and stockpiled ~~and approximately~~during construction. Of the 16,500 cubic yards, about 4,000 cubic yards ~~of the stockpiled topsoil~~ would be used ~~during restoration~~on site, ~~with~~and the balance would be removed ~~from the site~~.
2-64	Access road construction would begin by excavating a maximal depth of 7 feet at the intersection with Union Road, tapering off to 2 feet deep for the remainder of the road.	The least amount of excavation (approximately 2 feet) will occur at the connection to Union Road. The greatest amount of excavation (approximately 17 feet) will be in the area just past the second entrance to the PG&E 70kV yard. Please revise text to read: Access road construction would begin by excavating ~~a maximal~~ to a depth of approximately ~~7~~2 feet at the intersection with Union Road, ~~tapering off~~ increasing to ~~2~~17 feet deep for the remainder of the road.
2-64	Next, the road would be graded and compacted in accordance with engineering standards and geotechnical requirements. Following initial compaction, approximately 15,000 cubic yards of road base would be imported, distributed on site, and final compacted.	Please revise text to read: Next, the road would be graded and compacted in accordance with engineering standards and geotechnical requirements. Following initial compaction, ~~approximately 15,000 cubic yards of~~ road base would be imported, distributed on site, and final compacted.
2-73	Table 2-9. Total Approximate Area (acres)—6.20	Please revise text to read: Total Approximate Area (acres)—~~6.20~~6.09~~6~~6.20.2
2-74 & 2-75	The two staging areas supporting construction of the substation, totaling 1.9 acres, would be located entirely within the 15-acre permanent disturbance area.	Please revise text to read: The two Estrella Substation staging areas supporting construction of the substation, totaling approximately 1.9 acres, would be located entirely within the 15~~20~~-acre ~~site~~ permanent disturbance area.
2-77	Permanent and construction access to the proposed substations would be immediately off Union Road on a new private access road. The main access road would be paved and measure about 1,100 feet long and about 20 feet wide.	Please revise text to read: Permanent and construction access to the proposed substations would be immediately off Union Road on a new private access road. The main access road would be paved and measure about 1,~~1~~700 feet long and about 20 feet wide.
2-78	Construction would typically occur 6 days per week (Monday through Saturday)	Please revise text to read:

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	throughout the duration of construction.	Construction would typically occur 6 days per week (Monday through Saturday) throughout the duration, although water trucks may be operated on Sundays for fugitive dust control in compliance with the Construction Activity Management Plan.
2-88	Table 2-11. Anticipated Permits and Approvals and Applicable Regulatory Requirements.	Some equipment, such as the 230/70kV transformer and the control house, may require Caltrans Transportation Permit for transporting oversize/overweight equipment. As such, please revise Table 2-11 to include Caltrans Transportation Permits.
CHAPTER 3 – ALTERNATIVES DESCRIPTION		
3-4	The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (approximately 15,290 gallons) as the Proposed Project.	The proposed Estrella substation would use between 16,000 to 18,000 gallons of mineral oil. Please revise text to read: The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (between approximately ~~15,290~~ 16,000-18,000 gallons) as the Proposed Project.
3-91	The quantity of mineral oil to be used for transformers for Alternative SE-1A would be the same (approximately 15,290 gallons) as the Proposed Project.	The proposed Estrela substation would use between 16,000 to 18,000 gallons of mineral oil. Please revise text to read: The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (between approximately ~~15,290~~ 16,000-18,000 gallons) as the Proposed Project.
CHAPTER 4 – ENVIRONMENTAL ANALYSIS		
AESTHETICS		
4.1-3	The proposed Estrella Substation site occupies an approximately 15-acre area to the north of Union Road.	HWT is acquiring a 20-acre parcel. Please revise text to read: The proposed Estrella Substation site occupies ~~an~~ approximately 15 acres of a 20-acre site to the north of Union Road.
4.1-39	Construction of the new substation would occur on a 15-acre parcel adjacent to Union Road.	HWT is acquiring a 20-acre parcel. Please revise text to read: Construction of the new substation would occur on approximately 15 acres within a 20-acre parcel adjacent to Union Road.
4.1-46	General comment regarding SS-1 analysis	The analysis does not adequately consider permanent impacts to the visual character. SS-1 would be sited directly adjacent to the Estrella River. While the viewer concern and exposure may in fact be lower at this site than the Estrella site, the analysis undervalues

<table>
<tr><th>Page #</th><th>DEIR Language</th><th>Horizon West Transmission Comments</th></tr>
<tr><td></td><td></td><td>the visual sensitivity of this scenic area and neglects consideration of the substantial degree that this substation would contrast with and dominate the landscape from an aesthetics perspective.</td></tr>
<tr><td>4.1-50</td><td>This alternative site would result in less adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is already characterized by electrical infrastructure.</td><td>Average daily traffic is greater along El Pomar Drive than along Union Road adjacent to the proposed substation. Therefore, viewer exposure would be greater than the Estrella substation. Additionally, the interconnection line would be longer than the interconnection line for the Estrella substation. While it is true that the substation expansion area is directly adjacent to an existing substation, the expanded substation would be constructed on undeveloped land and would require the removal of oak trees and other vegetation. As such, the visual dominance of the substation would increase. For these reasons, aesthetic impacts would be similar to the Estrella substation.

Please revise text to read:

This alternative site would result in ~~less~~ similar adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is already characterized by electrical infrastructure.</td></tr>
<tr><td>4.1-50</td><td>Development of the substation at the Bonel Ranch site would substantially alter the visual character of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities.</td><td>The analysis under criterion B never identifies that impacts would be significant, contrary to the proposed Estrella substation and Alternative SE-1A.

Please revise text to read:

Development of the substation at the Bonel Ranch site would substantially alter the visual character or quality of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities, which would be a significant impact.</td></tr>
<tr><td colspan="3">AGRICULTURE AND FORESTRY RESOURCES</td></tr>
<tr><td>~~4.2-4~~</td><td>~~Table 4.2-1. FMMP Acreage at the Estrella Substation Site~~</td><td>~~Update table to account for the Important Farmland on the 20-acre parcel as follows:~~

<table><tr><td>~~Type~~</td><td>~~Percentage~~</td><td>~~Acres~~</td></tr><tr><td>~~Importance~~</td><td>~~3.13~~</td><td>~~0.626~~</td></tr><tr><td>~~Grazing Land~~</td><td>~~2.28~~</td><td>~~0.456~~</td></tr><tr><td>~~Statewide Importance~~</td><td>~~13.12~~</td><td>~~2.624~~</td></tr><tr><td>~~Unique~~</td><td>~~81.47~~</td><td>~~16.294~~</td></tr></table></td></tr>
<tr><td>~~4.2-4~~</td><td>~~As shown in Table 4.2-1, approximately 17 percent (2.66 acres) of the site is Farmland of Statewide Importance, while 77 percent (11.70 acres) is Unique Farmland and a small percentage is Farmland of Local Importance and Grazing Land.~~</td><td>~~Please revise text to read:~~

~~As shown in Table 4.2-1, approximately 17~~ 13 percent (~~2.66~~ 2.626 acres) of the site is ~~Farmland of Statewide Importance, while 77 approximately 81 percent (16.30 1.70 acres) is Unique Farmland and a small percentage is Farmland of Local Importance and Grazing Land.~~</td></tr>
<tr><td>~~4.2-2~~</td><td>~~Table 4.2-2. Agricultural Land Impacts from the Proposed Project~~</td><td>~~Update table to account for the disturbance to the 20-acre parcel as follows:~~</td></tr>
</table>

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		~~Type~~ ~~Percentage~~ ~~Acres~~ ~~Importance~~ ~~3.13~~ ~~0.626~~ ~~Grazing Land~~ ~~2.28~~ ~~0.456~~ ~~Statewide Importance~~ ~~13.12~~ ~~2.624~~ ~~Unique~~ ~~81.47~~ ~~16.294~~
4.2-14	As described in the PEA, based on the utility exemption in the Williamson Act, the approximately 15-acre substation site would be created as a separate legal parcel and removed from the larger 98-acre Williamson Act contract.	HWT is acquiring a 20-acre parcel. Please revise text to read: As described in the PEA, based on the utility exemption in the Williamson Act, the approximately ~~15~~20-acre substation site would be created as a separate legal parcel and removed from the larger 98-acre Williamson Act contract.
4.2-15	Therefore, the reduction of the current 98-acre Williamson Act parcel down to 83 acres would not disqualify the proposed 15-acre substation parcel as an agricultural preserve according to San Luis Obispo County.	HWT is acquiring a 20-acre parcel. Please revise text to read: Therefore, the reduction of the current 98-acre Williamson Act parcel down to 83 acres would not disqualify the proposed ~~15~~20-acre substation parcel as an agricultural preserve according to San Luis Obispo County.
4.2-15	However, placing the substation within the existing parcel under Williamson Act contract would conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use.	California Government Code §51238 states that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Further, as noted in the DEIR, removing the proposed substation parcel from the 98-acre Williamson Act would not disqualify the remaining contracted area from an agricultural preserve. The remaining land under the modified contract will continue to be cultivated and will limit land uses to compatible uses as outlined by the County's Rules of Procedure, and the remaining parcel will exceed the 40-acre minimum parcel size specified in the original contract. As such, HWT disagrees with the conclusion that placing the substation within the existing parcel under Williamson Act contract would conflict with the Williamson Act contract. Please revise text to read: ~~However, p~~ Placing the substation within the existing parcel under Williamson Act contract would not conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use, because Government Code Section 51238 specifies that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Removing the proposed substation parcel from the 98-acre Williamson Act would not disqualify the remaining contracted area from an agricultural preserve, and the remaining parcel will exceed the 40-acre minimum parcel size specified in the original contract.

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4.2-17	The Bonel Ranch parcel is not under a Williamson Act contract; therefore, there would be no potential to conflict with a Williamson Act contract. As a result, impacts under significance criterion B would be less than significant	According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. Please revise text to read: The Bonel Ranch parcel is ~~not under~~ subject to a Williamson Act contract; therefore, placing the substation within the existing parcel under Williamson Act contract would conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use to the same extent as the Proposed Project.
AIR QUALITY		
4.3-17	Even with the implementation of APM measures, construction-related ROG and NOX emissions threshold exceedances would be considered a significant impact. Mitigation Measure AIR-1 is proposed to reduce potentially significant impacts, requiring implementation of SLOCAPCD standard mitigation measures, BACT, and preparation of a site-specific CAMP that must be reviewed and approved by the APCD prior to the start of construction. The CAMP would be a comprehensive document that captures all pollutant emission reduction measures to be implemented for the approved project. Approval by the APCD would ensure all feasible and appropriate mitigation measures have been incorporated.	Construction related emissions following implementation of APM-1 through APM-3 and Mitigation Measure AIR-1 were not estimated in the EIR. Mitigated emissions should be estimated to support this finding.
BIOLOGICAL RESOURCES		
4.4-9	Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be "rare, threatened, or endangered in California" (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected in California.	The applicable CFGC section should be referenced. Please revise text to read: Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be "rare, threatened, or endangered in California" (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected ~~in California.~~ under California Fish and Game Code Section 3503 *et seq.*
4.4-42	Crotch's bumble bee, which utilize rodent burrows, tufts of grass, old bird nests on the ground, rock piles, or cavities in dead trees for nest construction, has potential to occur within the Proposed Project area. Direct impacts to Crotch's bumble bee could occur if rodent burrows within the Proposed Project disturbance area were utilized as nests and destroyed through construction activities. Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally, implementation of APMs BIO-3 and GEN-1 would further reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be	While preconstruction surveys would help avoid and minimize impacts to special-status species, surveying rodent burrows for the state candidate endangered Crotch's bumblebee within the project footprint is impracticable due to the abundance of burrow systems and absence of protocol survey guidance for identification of nest colonies. Current review of iNaturalist (https://www.inaturalist.org/taxa/271451-Bombus-crotchii accessed: January 4, 2021) show observation of the species occurring south and southeast of Santa Maria. The document recognizes the potential of species occurrence in the region, but little is known about its current distribution, hibernacula, or overwintering sites, and direct impacts cannot be adequately concluded due to the lack of this information.

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	required to notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals identified during pre-construction surveys or during the course of construction activities.	Applicants are required to follow all provisions of CESA in regard to California candidate or listed species, but are not specifically required to "notify and coordinate with CDFW" on any candidate or listed species identified during pre-construction surveys. Please revise text to read: ~~Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally,~~ iImplementation of APMs BIO-3 and GEN-1 would ~~further~~ reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to follow all provisions of CESA in regard to California candidate or listed species ~~notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals~~ identified during ~~pre-construction surveys or during~~ the course of construction activities.
4.4-44	Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts would be significant.	Please revise text to read: Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts may be ~~would be~~ significant.
GEOLOGY, SOILS, SEISMICITY, AND PALEONTOLOGICAL RESOURCES		
4.7-35	Further, design and construction requirements in G.O. 95 and 174, as well as the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils, ensuring the potential for such impacts would be less than significant.	G.O. 95 does not apply to substations. Please revise text to read: Further, design and construction requirements in G.O. ~~95 and~~ 174~~, as well as~~ and the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils, ensuring the potential for such impacts would be less than significant.
HAZARDS AND HAZARDOUS MATERIALS		
4.9-7	Estrella Substation would be located on approximately 15 acres of land that is currently under agricultural cultivation as a vineyard.	HWT is acquiring a 20-acre parcel. Please revise text to read: Estrella Substation would be located on approximately 20 acres that is currently under agricultural cultivation as a vineyard.

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LAND USE AND PLANNING		
4.11-2	The substation would be constructed on an approximately 15-acre site, carved out of a 98-acre parcel of land designated as agriculture and currently being used as a vineyard (one of five contiguous parcels operated by Steinbeck Vineyards & Winery).	HWT is acquiring a 20-acre parcel. Please revise text to read: The substation would be constructed on an approximately 15 acres within a 20-acre site, carved out of a 98-acre parcel of land designated as agriculture and currently being used as a vineyard (one of five contiguous parcels operated by Steinbeck Vineyards & Winery).
PUBLIC SERVICES		
4.15-11	Therefore, the Proposed Project would not require the construction of new or expanded school facilities, which could result in substantial adverse physical environmental effects. This impact would be less than significant.	The project would not directly or indirectly induce population growth and would not require the relocation of non-local construction workers given the limited nature of construction activities. Therefore, there is no basis for the less than significant determination on schools and this impact should be changed to no impact, as described in the PEA. Please revise text to read: Therefore, the Proposed Project would not require the construction of new or expanded school facilities, which could result in substantial adverse physical environmental effects. ~~This impact would be less than significant.~~ No impact would occur.
TRANSPORTATION		
4.17-23	The number of construction vehicle trips and the frequency of the trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3).	Construction of BS-1 will be longer in duration than the propped Estrella substation. Therefore, construction related effects would last longer. Please revise text to read: The number of construction vehicle trips and the frequency of the trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3). However, the effects of construction related transportation impacts would last longer due to the longer construction schedule for Alternative SS-1.
4.17-27	The number of construction vehicle trips and the frequency of the trips for Alternative SE-1A is estimated to be the same as for the Proposed Project (see Table 4.17-3).	Construction of SE-1A will be longer in duration than the propped Estrella substation. Therefore, construction related effects would last longer. Please revise text to read: The number of construction vehicle trips and the frequency of the trips for Alternative SE-1A is estimated to be the same as for the Proposed Project (see Table 4.17-3). However, the effects of construction related transportation impacts would last longer due to the longer construction schedule for Alternative SS-1.
WILDFIRE		
4.20-5	The proposed Estrella Substation would be located on approximately 15 acres of land	HWT is acquiring a 20-acre parcel.

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	within an existing vineyard.	Please revise text to read: The proposed Estrella Substation would be located on approximately 15 acres within a 20 acre~~s of land~~ site within an existing vineyard.
	Construction and operation of the reasonably foreseeable distribution components, including installation of the 21/12 kV pad-mounted transformer, and ultimate buildout of Estrella Substation, would not be expected to substantially exacerbate wildfire risks, such that people would be exposed to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, and/or people or structures would be exposed to significant risks (e.g., downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes.) Construction and operation activities would be on a much smaller scale than that of the Proposed Project, and similar to the Proposed Project, would occur within areas under irrigated agriculture cultivation (generally a low fire risk land use) or road rights-of-way. Construction and operation activities would comply with the PRC wildland fire safety requirements for grass- and brush-covered lands, as well as the California Fire Code. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would need to comply with applicable vegetation clearance requirements (see Section 4.20.2; fire prevention standards for electric utilities) and would not be located in high fire risk areas or the SRA (apart from one pad-mounted transformer that would be located on the border of the SRA). Therefore, impacts under significance criteria B and D would be less than significant.	Please revise text to read: Construction and operation of the reasonably foreseeable distribution components, including installation of the 21/12 kV pad-mounted transformer, and ultimate buildout of Estrella Substation, would not be expected to substantially exacerbate wildfire risks, such that people would be exposed to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, and/or people or structures would be exposed to significant risks (e.g., downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes.) Construction and operation activities would be on a much smaller scale than that of the Proposed Project, and similar to the Proposed Project, would occur within areas under irrigated agriculture cultivation (generally a low fire risk land use) or road rights-of-way. Construction and operation activities would comply with the PRC wildland fire safety requirements for grass- and brush-covered lands, as well as the California Fire Code. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would need to comply with applicable vegetation clearance requirements (see Section 4.20.2; fire prevention standards for electric utilities) and would not be located in high fire risk areas or the SRA (apart from one pad-mounted transformer that would be located on the border of the SRA). Therefore, impacts under significance criteria B and D would be less than significant.
CHAPTER 5 – ALTERNATIVES ANALYSIS SUMMARY AND COMPARISON OF ALTERNATIVES		
5-11	Additionally, while the Bonel Ranch site is currently in agricultural use (alfalfa production), it is not on land classified as one of the protected categories of Important Farmland under CEQA (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland); thus, placing the substation at this location would reduce the Proposed Project's significant impacts on agriculture resources.	According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. Please revise text to read: Additionally, while the Bonel Ranch site is currently in agricultural use (alfalfa production) and is subject to Williamson Act contract, it is not on land classified as one of the protected categories of Important Farmland under CEQA (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland); thus, placing the substation at this location would reduce the Proposed Project's significant impacts on agriculture resources.
CHAPTER 6 – OTHER STATUTORY CONSIDERATIONS AND CUMULATIVE IMPACTS		
6-13	Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant on their own.	This statement conflicts with the findings from the Aesthetics analysis. As described therein, the DEIR found significant impacts for SS-1, PLR-1A, and PLR-1C. Mitigation was identified to reduce impacts to less than significant. As such, these alternatives are not less than significant on their own.

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		Please revise text to read: Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant with implementation of mitigation ~~on their own.~~
6-21	None of the other alternatives, nor the reasonably foreseeable distribution components, would significantly affect agricultural resources at the project level.	According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. The cumulative analysis should be revised to account for this impact.
APPENDIX F — MMRP		
MM AES-1	HWT and PG&E shall implement the following measures: • Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation. For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk. • At the substation, incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown) in order to minimize visual contrast.	The 230 kV yard would be most visible to motorists along its southeastern perimeter fronting Union Road. As such, the measure should be revised to limit the installation of chain link fence slats to this portion of the substation's perimeter. Please revise text to read: HWT and PG&E shall implement the following measures: • Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation. For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk. • At the substation's southeastern perimeter fronting Union Road, incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown) in order to minimize visual contrast.
MM AG-1	HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall contribute sufficient funds (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements. The amount of HWT's and PG&E's contribution shall ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.	As explained in more detail in HWT's comment letter, MM AG-1 needs to be revised to allow HWT and PG&E to utilize other comparable mitigation measures that would achieve conservation easements for important farmland, such as through agreements with landowners to establish and record a conservation easement, or through contributions to a local agency to achieve the agricultural land conservation MM AG-1 also needs to be revised to recognize that PG&E and HWT will have different contribution amounts that are based on their respective impacts to Important Farmland. For these reasons, please revise the text to read: HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall finalize and effectuate any combination of the following as long as the total acreage in the aggregate equals the amount required by the conservation ratio specified below: either (1) contribute ~~sufficient~~ funds, in an amount equal to the fair market value (determined as of the date construction commenced) of each acre for which the contribution is made, ~~(i.e., adequate to support the conservation ratio described below)~~ to

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		the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives, or to another public agency or non-profit organization able to achieve long-term preservation of agricultural lands in San Luis Obispo County; and/or (2) enter into and record one or more conservation easements with landowners for specific farmland in San Luis Obispo County. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California though the use of agricultural conservation easements and is one potential recipient of any contribution in clause (1) above. The acreage for which ~~amount of~~ HWT's and PG&E's contributions are made in clause (1) above, together with any acreage preserved through recorded conservation easements in clause (2) above, shall equal a minimum total ~~ensure the conservation~~ of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by their respective components associated with the Proposed Project or alternatives~~, based on the market price for the commensurate agricultural land at the time that the impacts occur~~.
APM BIO-1.	Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants-	The title of APM BIO-1 does not match the title of APM BIO-1 in Table ES-1 and Table 2-12. Please revise text to read: Table F-1: APM BIO-1. ~~Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants~~ Conduct Pre-Construction Survey(s) for Special-Status Species and Sensitive Resource Areas
MM BIO-1	Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.	Please revise text to read: Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all uncovered and unfenced steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.
MM BIO-1	Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies throughout the duration of the ground-disturbing and vegetation-removal construction phase.	Reports will be submitted to the to the CPUC only since no permits are held with regulatory agencies. Please revise text to read: Weekly biological construction monitoring reports shall be prepared and submitted to the CPUC ~~appropriate permitting and responsible agencies~~ throughout the duration of the ground-disturbing and vegetation-removal construction phase.
MM BIO-1	Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction. Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as	Gravel bags and erosion and sediment controls would be implemented per the SWPPP. Further, the project has been designed to avoid impacts to wetlands and/or waters of the state as per HYDRO-1. In addition, indirect effects to wetlands and/or riparian areas present along and within the project (e.g., discharge of sediment and pollutants, fugitive

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	determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.	dust) would be minimized through implementation of APMs HYDRO-1, HAZ-1, GEN-1, and AIR-3. Please revise text to read: ~~Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction.~~ Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.
APM BIO-2	If work is scheduled during the nesting season (January 15 through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).	Standard nesting season dates are March 1st through August 15th or 31st; occasionally starting as early as February 1st. January 15th is still in winter timeframes with only select species such as golden eagles beginning to nest. As such, the January 15 nesting season restriction should only apply to golden eagles. Please revise text to read: If work is scheduled during the nesting season (commencing January 15 for golden eagle and February 1 for all other birds through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).
MM BIO-2	If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness.	The substation site is an active vineyard with very low potential to support special-status plant species. This measure should not apply to HWT. Please revise text to read: If avoidance of special-status plants is not feasible, ~~HWT and~~ PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness.
MM BIO-3	Operational construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible. If infeasible, HWT and PG&E shall retain a CPUC-approved biologist to conduct a nesting bird survey of the surrounding 500-foot area to determine if any active nest is present. If an active nest is	Please revise text to read: ~~Operational~~ ~~c~~Construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible. If infeasible, HWT and PG&E

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	found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If operational construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.	shall retain a CPUC-approved biologist to conduct a nesting bird survey of the surrounding 500-foot area to determine if any active nest is present. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If ~~operational~~ construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.
MM BIO-4	HWT, PG&E, and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat.	The substation will not impact blue oak woodland habitat. This measure should apply to PG&E components only. Please revise text to read: ~~HWT,~~ PG&E and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat.
MM GEO-1	HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017). These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.	Please revise text to read: HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017), including any subsequent addendums to such reports. These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.
MM NOI-1	Mitigation Measure NOI-1: General Construction Noise.	The DEIR on page 4.13-18 states that "ground-level construction noise from the Proposed Project would not be significant given: (1) the limited number of noise-sensitive receptors in proximity to much of the Proposed Project; (2) the relatively rapid attenuation of even the loudest pieces of construction equipment with distance from the source, and (3) the impacts would be temporary and occur over a relatively short duration at individual structure locations or segments of the 70 kV power line alignment (as opposed to work occurring along the entire alignment simultaneously)." However, the DEIR states that Mitigation Measure MM NOI-1 is applicable to all construction activities. Because the DEIR concluded that ground level construction activities would result in less than significant impacts, MM NOI 1 should not apply to ground-level construction activities. APM NOI-1 and APM NOI-2 would further reduce already less than significant ground-level construction noise.

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