




## State Agencies or Elected Representatives

### Letter A: Jordan Cunningham, State Assembly Legislature (January 26, 2021)

<p><b>STATE CAPITOL</b>                  P.O. BOX 942849                  SACRAMENTO, CA 94249-0035                  (916) 319-2035                  FAX (916) 319-2135</p> <p><b>DISTRICT OFFICE</b>                  1304 BROAD STREET                  SAN LUIS OBISPO, CA 93401                  (805) 549-3381                  FAX (805) 549-3400</p>	  <b>JORDAN CUNNINGHAM</b> ASSEMBLYMEMBER, THIRTY-FIFTH DISTRICT	<p style="text-align: right;"><b>Letter A</b></p> <p><b>COMMITTEES</b>                  CO-CHAIR: ETHICS                  VICE CHAIR: JOBS, ECONOMIC                  DEVELOPMENT, AND THE ECONOMY                  VICE CHAIR: RULES                  AGRICULTURE                  BUSINESS AND PROFESSIONS                  TRANSPORTATION                  UTILITIES AND ENERGY</p> <p><b>SELECT COMMITTEES</b>                  CAREER TECHNICAL EDUCATION                  AND BUILDING A 21<sup>ST</sup> CENTURY                  WORKFORCE                  CENSUS                  CYBERSECURITY</p>
<p>January 26, 2021</p> <p>Rob Peterson, CPUC                  c/o Tom Engels                  Horizon Water and Environment, LLC                  266 Grand Avenue, Suite 210                  Oakland, CA 94610</p> <p>Mr. Peterson:</p>		
A-1	<p>I am writing to respectfully request opposition to the current proposed route of the 70Kv transmission lines included in PG&amp;E and Horizon West’s proposed Estrella Substation and Paso Robles Area Reinforcement Project.</p>	
A-2	<p>The proposed route would severely impact the Golden Hill business district along with multiple residential neighborhoods and numerous current and future businesses. The Golden Hill area is one of the largest potential growth communities in the Paso Robles area and this proposed route would be detrimental to this effort as well as the future growth for the City.</p>	
A-3	<p>For a City and region that rely on tourism and recreation as a majority of its financial stability and livelihood, 70-foot poles and transmission lines woven throughout is an unacceptable visual. This is not what the tourism industry wants to promote, and will force residents and businesses to live with the visual impacts on a daily basis.</p>	
A-4	<p>The #1 ranked project alternative known as “Alternative PLR-1A, Green Route”, (Estrella Route to Estrella Substation) would move the transmission lines East and to the North of Paso Robles. This route would have far fewer impacts on residential neighborhoods, businesses, and the Highway 46 corridor. This alternative has already been deemed the #1 environmentally superior alternative under the draft EIR by the CPUC. “Alternative PLR-1C, Yellow Route”, (Bonel Ranch Option 1) would also be a less intrusive route with minimal impacts on residential and business growth areas. These two options, with minimal impacts on residents, businesses and the environment, are far better.</p>	
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JORDAN CUNNINGHAM  
 ASSEMBLYMEMBER, THIRTY-FIFTH DISTRICT

COMMITTEES  
 CO-CHAIR: ETHICS  
 VICE CHAIR: JOBS, ECONOMIC  
 DEVELOPMENT, AND THE ECONOMY  
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SELECT COMMITTEES  
 CAREER TECHNICAL EDUCATION  
 AND BUILDING A 21<sup>ST</sup> CENTURY  
 WORKFORCE  
 CENSUS  
 CYBERSECURITY

A-5

We appreciate the CPUC taking up this important issue for consideration and hope that it will choose to reject the current proposed route through the Golden Hill corridor and support local residents and businesses by promoting the "Green Route, PRL-1A-Estrella Route" as a first choice, and "Yellow Route, PLR 1-C-Estrella Route to Bonel Ranch" as a second alternative in the draft EIR report.

Sincerely,

Jordan Cunningham  
 Assemblyman, 35th District

**Response to Comment A-1**

The commenter's opposition to the Proposed Project is noted and will be shared with the CPUC's decisionmakers.

**Response to Comment A-2**

The commenter states that the Proposed Project will negatively impact current residential neighborhoods and businesses as well as future development in the Golden Hill area. One of the objectives of the Proposed Project is to accommodate expected future increased electric distribution demand in the Paso Robles Distributed Planning Area (DPA), particularly in the anticipated growth areas in northeast Paso Robles. (Final Environmental Impact Report [FEIR], Volume 1, Section 2.1.2.) Therefore, while CPUC acknowledges the commenter's concerns regarding potential detrimental impacts on these communities (which are described in the EIR), the Proposed Project would provide future development in this area with secure energy resources. The comment is noted and will be shared with the CPUC's decisionmakers.

**Response to Comment A-3**

This comment expresses concerns regarding the visual impact that the proposed "70-foot poles and transmission lines" would have on the City of Paso Robles and region's tourism industry, residents, and businesses.

The impact analysis under Impact AES-3 of Section 4.1, "Aesthetics," describes the visual effects of the proposed 70 kV power line, including the reconductoring segment. Implementation of Mitigation Measure AES-1, as described on pages 4.1-43 to 4.1-44 in Volume 1 of the FEIR, would require the Proposed Project applicants to design the poles using a dulled finish or paint colors that are compatible with the surrounding area (i.e., dull grey, light brown, or green colors) in order to minimize visual contrast with the surrounding environment.

Regarding the commenter's concerns that the new poles would have impacts on residents, please note that CEQA is concerned with disclosing a project's effects on public views, not private views. While Section 4.1, "Aesthetics," does describe effects on residential views, the significance determinations are made in light of the criteria listed in Appendix G of the CEQA Guidelines, which are listed on pages 4.1-37 to 4.1-38 of Volume 1 of the FEIR.

Lastly, regarding the commenter's concerns that the proposed poles would have adverse impacts on the tourism industry and businesses, per CEQA Guidelines, "economic or social effects of a project shall not be treated as significant effects on the environment." (CEQA Guidelines, §§ 15131, 15382.) Potential impacts on the tourism industry, in and of themselves, are not physical impacts required to be included in a CEQA analysis and are not encompassed in a resource topic that is included in Appendix G of the State CEQA Guidelines. There is no evidence, and commenters do not provide any, that potential significant changes to the physical environment would result from economic effects of the Proposed project or alternatives. For this reason, this comment raises issues that are considered outside the scope of analysis required by CEQA.

**Response to Comment A-4**

The commenter’s support for Alternative PLR-1A: Estrella Route to Estrella Substation, or for Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1, is noted and will be shared with the CPUC’s decisionmakers.

**DResponse to Comment A-5**

The commenter’s support for Alternative PLR-1A, or for Alternative PLR-1C as a second choice, is noted and will be shared with the CPUC’s decisionmakers.

**Letter DY: Chris R. Holden and Jordan Cunningham, State Assembly Legislature (April 16, 2021)**

Letter DY

Assembly  
California Legislature



Rob Peterson, CPUC  
c/o Tom Engels  
Horizon Water and Environment, LLC  
266 Grand Avenue, Suite 210  
Oakland, CA 94610

Dear Mr. Peterson:

- DY-1 [ As the Chair of the Assembly Committee on Utilities and Energy, and the Assemblymember that represents San Luis Obispo County, we write to you today in opposition to the current proposed route of the 70Kv transmission lines included in PG&E and Horizon West's proposed Estrella Substation and Paso Robles Area Reinforcement Project.
- DY-2 [ These enormous transmission lines would negatively impact established businesses and residences, as well as the region's ability to expand as a tourist destination.
- DY-3 [ The Highway 46 corridor has the potential to develop into a commercial hub for Paso Robles and attract locals and tourists alike. This stretch of highway is the only route that connects two regions of Paso Robles, and connects the region to visitors and commuters coming in from the Central Valley. Up and down the corridor, there is tremendous opportunity for Paso Robles to expand commercially and residentially. This expansion will create jobs for the region and generate tax revenue that pay for important public safety services.
- DY-4 [ The development of this corridor is critical to the future of the region. Huge transmission lines, which can be over 200 feet tall, will harm the viability of this commercial corridor, impact the city's ability to attract investment to this area and cause harm to the businesses that are already operating in this area.
- DY-5 [ The #1 ranked project alternative known as "Alternative PLR-1A, Green Route", (Estrella Route to Estrella Substation) would move the transmission lines East and to the North of Paso Robles. This route would have far fewer impacts on residential neighborhoods, businesses, and the Highway 46 corridor. This alternative has already been deemed the #1 environmentally superior alternative under the draft EIR by the CPUC. "Alternative PLR-1C, Yellow Route" (Bonel Ranch Option 1) would also be a less intrusive route with minimal impacts on residential and business growth areas. These two options, with minimal impacts on residents, businesses and the environment, are far better.
- DY-6 [ We appreciate the CPUC taking up this important issue for consideration. We ask that it reject the current proposed route through the Golden Hill corridor and support local residents and businesses by promoting the "Green Route, PRL-1A-Estrella Route" as a first choice, and "Yellow Route, PLR 1-C-Estrella Route to Bonel Ranch" as a second alternative in the draft EIR report.

Sincerely,

Chris R. Holden  
Chair, Assembly Utilities & Energy Committee

Jordan Cunningham  
Assemblyman, 35th District

**Response to Comment DY-1**

The commenter provides an introduction, including background information as Chair of the Assembly Committee on Utilities and Energy and as a representative of San Luis Obispo County and expresses opposition to the Proposed Project's route. The commenter's opposition to the Proposed Project is noted and will be shared with the CPUC's decisionmakers.

**Response to Comment DY-2**

The comment asserts that the Proposed Project transmission lines would negatively impact established businesses and residences. For a response to concerns about aesthetic impacts of the transmission lines, refer to Master Response 3. Please also refer to Master Response 7 for discussion of property values and economic effects.

**Response to Comment DY-3**

The comment describes anticipated growth of the Highway 46 corridor for visitors and commuters. This comment does not raise an environmental issue related to EIR adequacy, and no further response is required. Nevertheless, this comment is noted and will be shared with the CPUC's decisionmakers.

**Response to Comment DY-4**

The comment asserts that the Proposed Project's transmission lines would negatively impact the viability of the Highway 46 commercial corridor. Per CEQA Guidelines Section 15131, subdivision (a), social and economic effects are not considered environmental impacts pursuant to CEQA, and no further response is required. Nevertheless, this comment is noted and will be shared with the CPUC's decisionmakers.

Note that the comment incorrectly implies that the Proposed Project's transmission lines could be over 200 feet tall. As shown in Table 2-5 in Chapter 2, *Project Description*, in Volume 1 of this FEIR, the maximum height of the 70 kV power line poles would be 133 feet tall. The maximum height of the lattice steel towers (LSTs) comprising the 230 kV interconnection is approximated at 113 feet above ground (FEIR, Volume 1, pages 2-20 to 2-22).

**Response to Comment DY-5**

The commenter's support for Alternative PLR-1A: Estrella Route to Estrella Substation, or Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1, is noted and will be shared with the CPUC's decisionmakers.


**Response to Comment DY-6**

The commenter's opposition to the Proposed Project is noted. The commenter's support for Alternative PLR-1A, or Alternative PLR-1C as a second choice, is noted and will be shared with the CPUC's decisionmakers.

## Local Agencies

### Letter B: Warren Frace, City of Paso Robles (February 19, 2021)

Letter B



**CITY OF EL PASO DE ROBLES**  
*"The Pass of the Oaks"*

OFFICE OF THE  
MAYOR

February 19, 2021

VIA MAIL AND EMAIL

Robert Peterson  
California Public Utilities Commission  
c/o Tom Engels  
Horizon Water and Environment  
266 Grand Avenue, Suite 110  
Oakland, CA 94610  
estrellaproject@horizonh20.com

**Subject:**  
**City of Paso Robles' Agency Comment on the Draft Environmental Impact Report for the Estrella Substation and Paso Robles Area Reinforcement Project**

Dear Mr. Peterson:

B-1 [ The City of El Paso de Robles (City) has reviewed the California Public Utilities Commission's (CPUC) draft Environmental Impact Report (EIR) for the Estrella Substation and Paso Robles Area Reinforcement Project proposed by NextEra Energy Transmission West, LLC and Pacific Gas and Electric Company (Project). We appreciate the opportunity to comment on the proposed Project.

B-2 [ The City is located within the scenic rolling hills and vineyards of Central California's premier wine region, the Paso Robles AVA. The City has both a robust wine tourism economy and a wide array of local industries. Key to the wine tourism economy is the preservation of region's scenic character and open vistas that define the Paso Robles region. Impacts to the region's natural resources are of upmost concern. Thus, the City supports all efforts to ensure that the Project will not have any significant or adverse aesthetic or visual impacts within the City of Paso Robles.

B-3 [ **City Council Determination on Project**  
The City understands the need and economic benefits of the Project and has been involved in the CPUC's consideration of this Project since 2016, consistently voicing the need to address aesthetic and visual impacts in the City (refer to Attachment 2 – Paso Robles Notice of Preparation letter). However, after a thorough review of the DEIR, hearing from 14 City's residents and businesses impacted by the Project and receiving numerous written correspondence in opposition to the Project, including a letter from California Assembly Member Cunningham, the Paso Robles City Council unanimously voted to direct staff to notify the CPUC they are **strongly opposed to the proposed project alignment and the City's preferred alternative is Alternative Combination #2, also referred to as the Estrella Route, which incorporates the northern PLR-1A route.**

B-4 [ **Benefits of Alternative Combination #2**  
As explained in the DEIR, Alternative Combination #2 "is considered the most advantageous option and is identified as the Environmentally Superior Alternative" (Draft EIR pg. 5-14). Alternative Combination #2 avoids the significant, permanent aesthetic impacts along Union Road, Highway 46 East and Golden Hill Road

Department of City Manager  
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B-4 cont. ↑ from the proposed Project’s 70 kV power lines. Although there are always trade-offs associates with alternatives, the City believes that Alternative Combination #2 is the best for the following reasons:

B-5 1. **Union Road / 46 East Impacts**  
 Union Road / 46 East is the City’s Eastern Gateway receiving all incoming traffic from I-5 and the Central Valley. As a primary gateway into the Paso Robles Wine Country region, the appearance of the corridor is vitally important. The 2014 General Plan Conservation Element identifies this area as both a “Gateway to the City” and “Natural Open Space Viewshed” (Attachment 1 - Figure C-3, 2014 Conservation Element).

B-6 2. **Golden Hill Road Impacts**  
 Many property owners and businesses along Golden Hill Road have invested great sums to improve the area and curate a unique, natural experience for enjoying the outdoors. In fact, over the years, some have even been required to underground utility lines along their properties to preserve the natural setting. It would be disingenuous and shameful to have required property owners spend large amounts of money to underground utility lines and then undo those efforts by running a 70 kV power line along that route. Running a new 70 kV power line and poles along this stretch would be devastating to the local businesses and undermine years of work to create the setting that now exists. These businesses and properties are important parts of the local economy, and they depend on preserving the natural environment to succeed. Thus, it is critical that the significant aesthetic impacts along Golden Hill Road be avoided. The proposed undergrounding alternative for this segment may not reduce the visual impacts due to the need to construct two Transition Stations (Figure 3-11 DEIR).

B-7 3. **Oak Tree Impacts**  
 Alternative Combination #2 reduces biological resource impacts by avoiding the area of blue oak woodland near where a known golden eagle nest is located. Again, preserving the natural environment, including trees and wildlife, are of great concern to the City. Thus, the City endorses Alternative Combination #2 to reduce these biological impacts.

B-8 4. **Visual Impact Analysis Inadequate**  
 The DEIR lacks adequate analysis to support the determination that Impact AES-1 would be Less Than Significant and require no Mitigation Measures. The DEIR’s limited description of pole heights as “typically would range between 80 to 90 feet” does not provide adequate information to determine impacts at specific locations. PG&E previously disclosed to staff that some poles may be 133 feet tall. Figure 4.1-6 of the DEIR appears to show a significant change to the 46 East Gateway, but the low-resolution exhibit and lack of pole height information provides inadequate information to make a conclusion or support the findings for AES-1. In addition, the project has not been designed to accommodate the Union Road / 46 East overcrossing bridge currently in the PAED process (City NOP comment #6). The design of the bridge’s fill slopes will require these poles to be significantly taller than currently shown in the DEIR.

B-9 5. **Inadequate Analysis of the Union Road / 46 East Overcrossing Bridge**  
 The City, Caltrans and the San Luis Obispo Council of Governments (SLOCOG) have been working for over a decade on the design of the State Route 46 overcrossing bridge at Union Road. Caltrans has identified this project as a top priority in San Luis Obispo County due to the important freight traffic connection between US 101 and Interstate 5. This project is currently in the Project Approval and Environmental Determination Phase (PAED) and will be moving into project design and funding in 2022. Funding of the project is a major challenge, and the design of the DEIR project places four new poles in conflict with the interchange project (refer to Attachment 2 – Analysis of PG&E Pole Locations). Due to significant funding constraints, the Bridge Project cannot include the cost to relocate the poles and increase the heights of the poles to provide clearance of the new Union Road



B-9  
cont.

alignment. The project DEIR did not include analysis of transportation impacts if the bridge is not constructed due to conflicts and cost overruns caused by the DEIR's project construction.

B-10

**6. Proposed Project Analysis with Paso Robles Incomplete**

The aesthetic impact analysis within the City of Paso Robles is insufficient to support the findings required to build the proposed project within Paso Robles. The City strongly recommends the CPUC approve the Alternative Combination #2 project, with the northern PLR-1A route powerline alignment, rather than revising and recirculating the DEIR for additional public review.

B-11

**River Road Reconductoring Phase Concerns**

All the alternatives include the reconductoring of the existing 70kv pole line that run parallel to River Road. These existing wood poles are located primarily within single family residential yards and silhouette the Salinas River bluffs which is identified in the General Plan Conservation Element as an important Visual Corridor and Natural Open Space Viewshed. The following aesthetic issues were not addressed in the DEIR:



B-12

**1. Inadequate Visual Impact Simulation**

The proposed replacement poles will be significantly taller (40± foot increases appear likely) than the existing poles, yet no analysis of this potential impact is included in the DEIR. The visual impact simulation along River Glen Drive is not typical of this segment and is the one area that is not visible from the Salinas River, US 101, Niblick Bridge, or the Downtown area.

B-13

**2. Lack of Pole Height Information**

The DEIR does not provide adequate information on either the height of the existing or proposed poles for the public to understand to potential change or visual impact to their neighbors or the overall community.

B-14

**3. Recommended Mitigation Measure AES-1**

Since the visual analysis of this portion of the project is inadequate, the City recommends that the replacement metal poles be of similar size to the existing wood poles. If this is not feasible, then the EIR must be revised and recirculated with a full visual analysis of the visual impact to the River Road corridor along the scenic Salinas River and historic De Anza Trail.

**Conclusion**

- B-15 [ In conclusion the City wants to ensure the project does not have any significant or adverse aesthetic or visual impacts within the City of Paso Robles and has two key points for the CPUC's considerations:
- B-16 [ 1. The City is strongly opposed to the proposed project alignment and the City's preferred alternative is Alternative Combination #2, also referred to as the Estrella Route, which incorporates the northern PLR-1A route.
- B-17 [ 2. The City recommends that the replacement metal poles for the River Road Reconductoring Phase be of similar size to the existing wood poles
- B-18 [ Note: The City's position on the alignment of the new 70kv reinforcement line has evolved since the City issued its May 6, 2019 Alternatives Screening letter, due to the additional visual analysis information provided in the DEIR.
- B-19 [ The City reiterates its request that it be included on the CPUC's mailing list for the Project and that the City be sent copies of all public meeting/hearing notices and other documents under CEQA and the Ralph M. Brown Act, as required by Public Resources Code section 21092 and Government Code section 54954.1. Please provide the City with physical copies of any such notices or other documents at 1000 Spring Street, Paso Robles, CA 93446. Please also provide the City with electronic copies to Warren Frace, Community Development Director at wfrace@prcity.com.
- B-20 [ The City appreciates your thoughtful consideration of the above comments and concerns and looks forward to working with you. If you have any questions or would like to discuss further, please contact Mr. Frace at (805) 237-3970 or wfrace@prcity.com.

Sincerely,



Steven W. Martin  
Mayor of Paso Robles

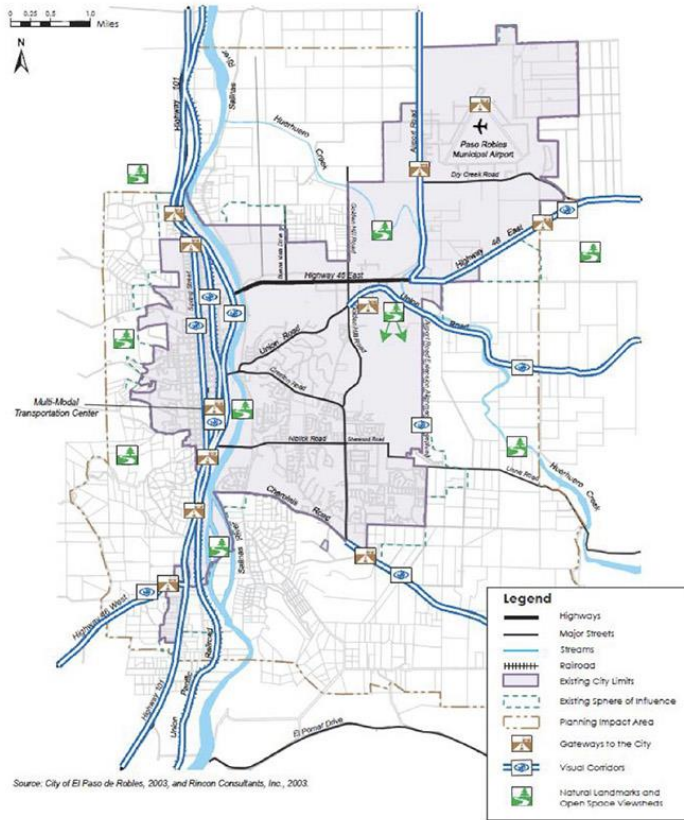
cc: Tom Frutchey  
Sarah Johnson-Rios  
Warren Frace  
Kimberly Hood  
City Council

**Attachments**

1. General Plan Conservation Element – Figure c-3
2. 8/31/18 City of Paso Robles Notice of Preparation Comments letter
3. Analysis of PG&E Pole Locations

B-21

City of El Paso de Robles General Plan 2003  
**Conservation Element**



City Gateways, Visual Corridors, Natural Landmarks,  
 and Open Space Viewsheds

Figure C-3

CO-13

Revised November 2014 via GPA 2014-003

**Attachment 1 – 2014 General Plan Conservation Element Figure C-3**

## Attachment 2 - City NOP Response Letter



**CITY OF EL PASO DE ROBLES**  
*"The Pass of the Oaks"*

August 31, 2018

Robert Peterson  
 California Public Utilities Commission  
 c/o Tom Engels  
 Horizon Water and Environment  
 400 Capitol Mall, Suite 2500  
 Sacramento, CA 95814  
 estrellaproject@horizonh2o.com

**Subject: Notice of Preparation of an Environmental Impact Report for the Estrella Substation and Paso Robles Area Reinforcement Project proposed by NextEra Energy Transmission West, LLC and Pacific Gas and Electric Company**

Dear Mr. Peterson:

B-22

The City of El Paso de Robles (City) has received the California Public Utilities Commission's (CPUC) 8/1/18 Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Estrella Substation and Paso Robles Area Reinforcement Project proposed by NextEra Energy Transmission West, LLC and Pacific Gas and Electric Company (Project). We appreciate the opportunity to comment on the proposed Project.

The City believes that early and frequent coordination between the CPUC and the City regarding the proposed Project is necessary to best serve the City and its more-than 30,000 residents. The City is surrounded by scenic rolling hills and California's premier wine regions, thus, the City has both a robust tourism economy and a wide array of local industries. Preserving and highlighting the region's beauty and history are essential. The City routinely acts as the California Environmental Quality Act (CEQA) lead agency for projects in the City, so the City is acutely aware of the natural resources that can be affected by projects in the area. The City hopes to work closely with the CPUC to ensure that the proposed Project has no potentially significant or adverse environmental impacts.

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

1. The NOP fails to mention Land Use as one of the potential topics to be analyzed. It is important that this topic not be left out. Large projects, such as freeways, railroads, and power lines can have dividing effects on communities, particularly when no mitigation is proposed. Such projects can also affect natural habitats and conflict with local planning measures. Regardless of whether such a project may be exempt from local land use controls, the topic should be fully analyzed in the EIR so that the public and decision makers can fully understand the Project's true effects.
2. Similarly, the Project's potential effects on recreation and housing should also be considered in the EIR. Recreation is hugely important to the City's residents and the tourism industry, and housing is particularly at the forefront of discussions in California. The proposed project power line runs adjacent to Barney Schwartz Park on Union Rd. and has the potential impact the park. Thus, these topics need to be addressed in the EIR.

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## Attachment 2 - City NOP Response Letter

B-22  
cont.

3. Any discussion in the EIR regarding the Paso Robles substation (Niblick Rd. and South River Rd.) needs to consider the significant detrimental effects (i.e., traffic, aesthetics, land use, etc.) that would result from expansion of that facility due to the facility being surrounded on all sides by multi-family residential and commercial uses. The aesthetic and safety impacts of acres of new batteries arrays in this area needs to be thoroughly analyzed and could result in significant impacts. Further, Niblick Road, immediately south of the facility, may need to be expanded in the future, further constraining any potential expansion of this substation.
4. Because of the natural beauty in and around the City, and the City's strong tourism industry, aesthetic impacts are of great concern to the City. The proposed scale of the poles (90 to 113 feet in height) would significantly taller than the existing 70kv lines in town and out of scale with the community. Thus, to avoid the significant aesthetic and community dividing effects of the Project, transmission lines should be placed underground to the full extent possible. Where undergrounding is not feasible, shorter poles should be considered.
5. Although the Project and its alternative routes are yet to be fully formed, to minimize impacts to residents, the City encourages the CPUC to thoroughly consider utilizing existing roads, such as Highway 46, as a transmission line route.
6. Any transmission line route that crosses Highway 46 Ease at Union Road needs to consider future plans to add an overpass at that location. The City and Caltrans are currently working on a PAED for this interchange project (see attachment 1).

To ensure smooth coordination, the City requests that it be added to the CPUC's mailing list for the Project and that the City be sent copies of all public meeting/hearing notices and other documents under CEQA and the Ralph M. Brown Act, as required by Public Resources Code section 21092 and Government Code section 54954.1. Please provide the City with physical copies of any such notices or other documents at 1000 Spring Street, Paso Robles, CA 93446. Please also provide the City with electronic copies at [dmckinley@prcity.com](mailto:dmckinley@prcity.com).

The City appreciates your thoughtful consideration of the above comments and concerns and looks forward to working with you. If you have any questions or would like to discuss further, please contact me at (805) 237-3861 or [dmckinley@prcity.com](mailto:dmckinley@prcity.com).

Sincerely,

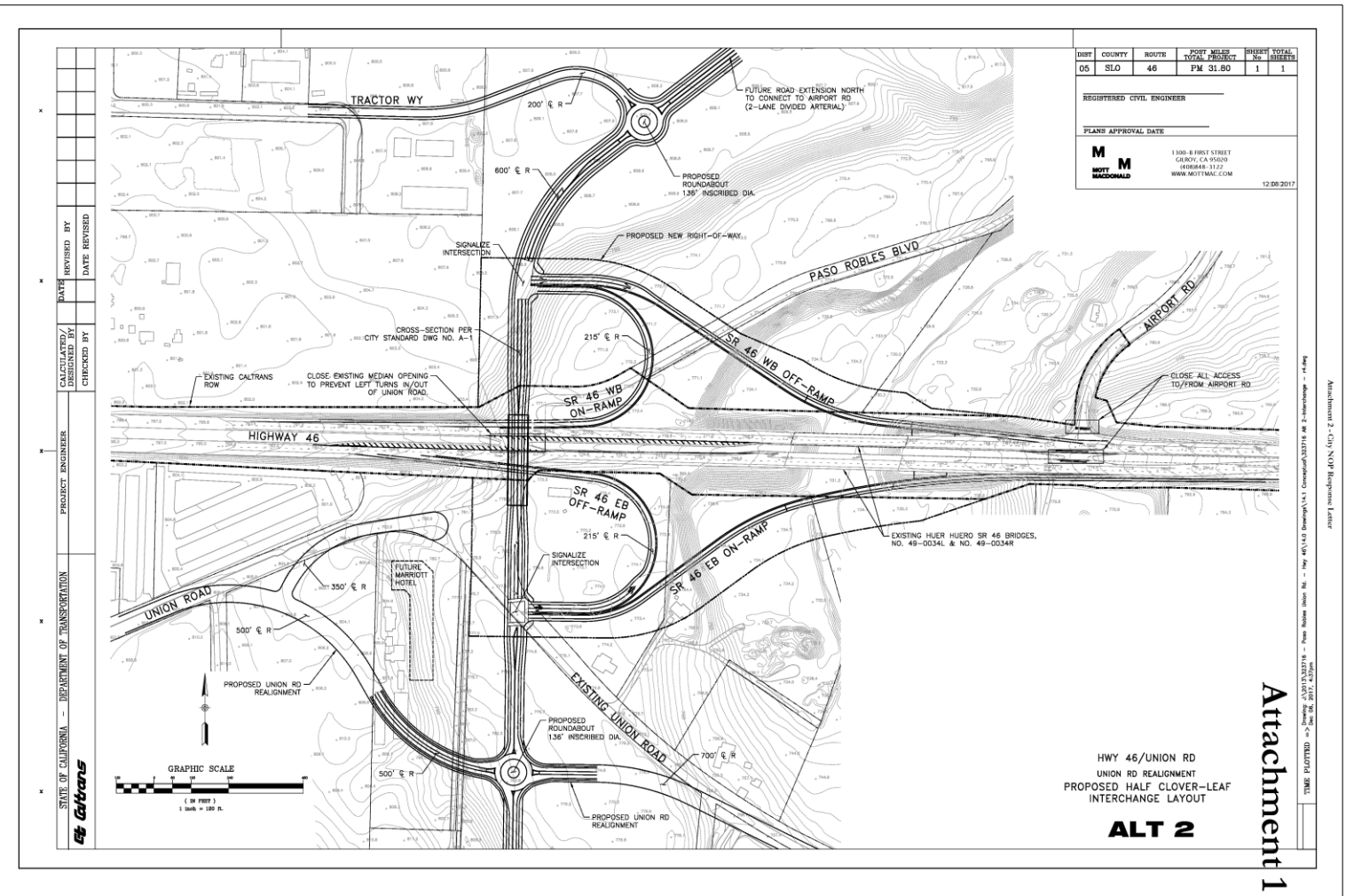


Warren Frace  
Community Development Director  
City of El Paso De Robles

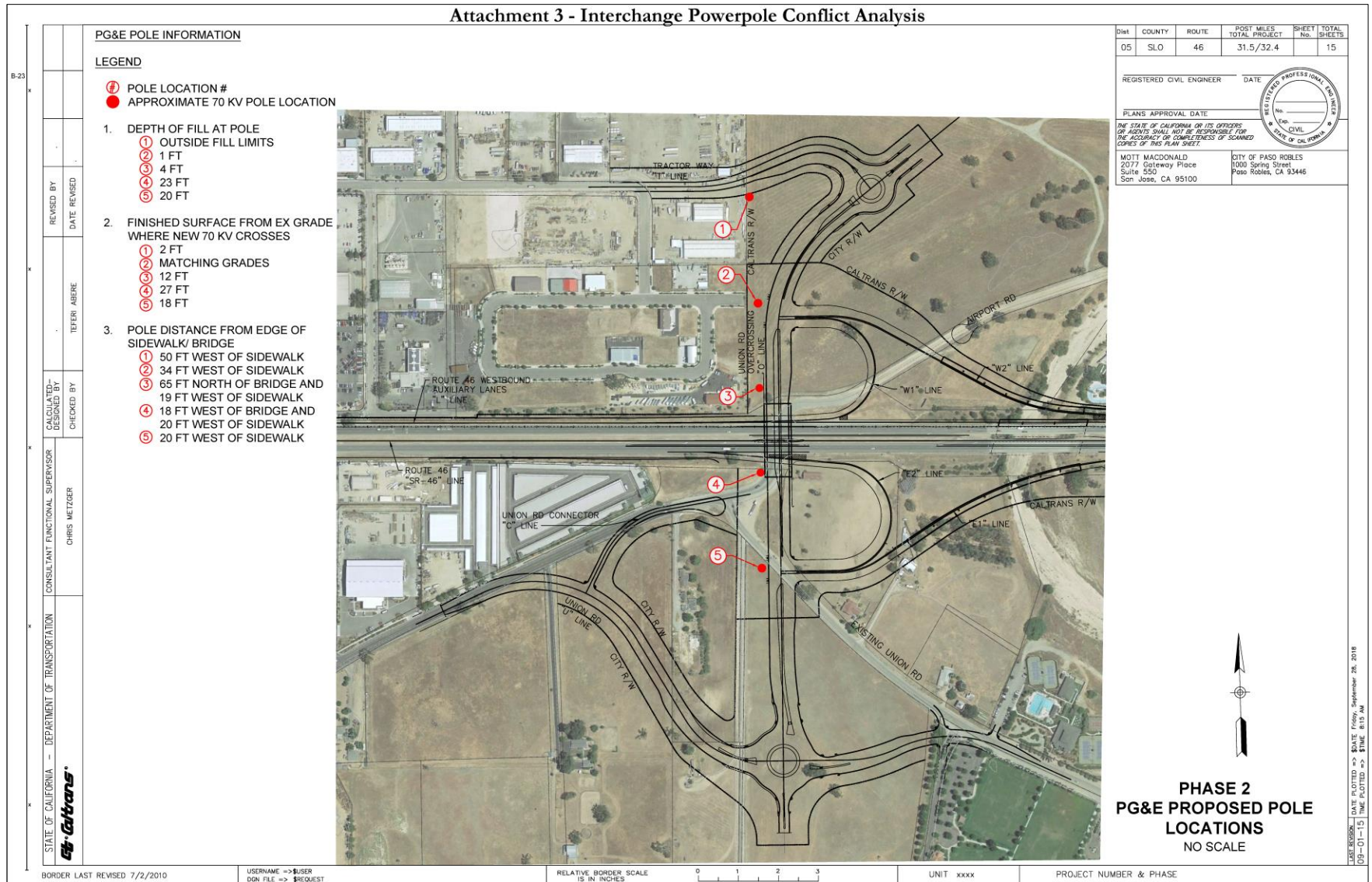
cc: Iris Yang  
Kimberley Hood  
Dick McKinley  
Warren Frace  
Julie Dahlen

Attachments:

1. 46 East / Union Interchange PAED Alternative 2



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**Response to Comment B-1**

This comment provides an introduction to the remainder of the comment letter and does not raise an environmental issue related to EIR adequacy, so no response is required. Thank you for your comment.

**Response to Comment B-2**

This comment expresses the City's concern and desire to preserve the region's scenic character and open vistas that define the Paso Robles region. The comment describes the City's support for all efforts to ensure that the Proposed Project will not have any significant or adverse visual impacts within the City of Paso Robles.

Please note that the discussion of impacts to scenic vistas has been revised in Section 4.1, "Aesthetics," in Volume 1 of the FEIR, to address specific concerns raised in Comment B-11. Similarly, the discussion of the Proposed Project's effects on visual character and visual quality in the FEIR has been revised in response to Comments H-88, I-53, I-55, J-61, J-111 and J-112. The text of Mitigation Measure AES-1 has been revised in response to Comments H-114, J-113, J-114, J-115, J-116, I-55, and I-59. Please see Master Response 3 for discussion addressing the visual impact the Project would have on the City of Paso Robles.

**Response to Comment B-3**

The commenter's discussion of the City Council's direction to notify the CPUC of its opposition to the Proposed Project alignment and its support for Alternative Combination #2 (Estrella Route) is noted.

**Response to Comment B-4**

The commenter's support for Alternative Combination #2 (Estrella Route) is noted.

**Response to Comment B-5**

The comment expresses the commenter's opinion that Alternative Combination #2 is preferable to the Proposed Project because it would avoid the Proposed Project's impacts on the Union Road/46 East Corridor. The comment emphasizes the importance of the appearance of the Union Road/46 East Corridor, a primary gateway into the Paso Robles Wine Country region from I-5 and the Central Valley. The comment points to the City's 2014 General Plan Conservation Element, which identifies this area as both a "Gateway to the City" and "Natural Open Space Viewshed."

The EIR notes that Union Road and Highway 46 East are considered visual corridors and gateways in the City of Paso Robles General Plan (see Volume 1 of the FEIR, p. 4.1-8; also see Appendix A in Volume 2 of the FEIR) and cites General Plan goals and policies designed to protect and enhance visual resources, gateways, and corridors. (FEIR, Volume 2, Appendix A.) In addition, the EIR explains that while State Route (SR) 46 is not a designated state scenic highway, it is eligible for designation as a scenic highway. Therefore, the analysis in the EIR considers potential aesthetic impacts to SR 46 as falling within its analysis of impacts to scenic resources. (FEIR, Volume 1, p. 4.1-39 to 4.1-40.) In its analysis, the EIR finds that the new 70kV power line segment would cross SR 46 in an area where there is an existing distribution line that crosses the highway. The EIR describes that while the new poles that would be installed as part

of the Proposed Project would be taller than the existing poles, the 70 kV power line would not substantially impair views from SR 46 or screen landscape features that are not already affected by the presence of the existing distribution line. (FEIR, Volume 1, page 4.1-39.) Figure 4.1-6, “Existing and Simulated Views of KOP 5,” in Volume 1 of the FEIR, illustrates the simulated visual impacts of the Proposed Project in this area. The EIR concludes that aesthetic impacts to the Highway 46 corridor would be less than significant.

The commenter’s concerns regarding the aesthetic impacts of the Proposed Project are addressed above and the commenter’s support for Alternative Combination #2 (Estrella Route) is noted and will be shared with the CPUC’s decisionmakers.

#### **Response to Comment B-6**

The comment expresses the commenter’s opinion that Alternative Combination #2 is preferable to the Proposed Project because it would avoid the Proposed Project’s impacts on Golden Hill Road. The comment expresses concerns about the visual and economic effects associated with installing a new 70 kV power line and poles along Golden Hill Road where many property owners and businesses have already invested money to underground existing utility lines. The comment also notes that the proposed undergrounding alternative along this segment may not reduce the visual impacts due to the need to construct two transition stations.

The commenter’s concerns regarding the aesthetic impacts of the Proposed Project and commenter’s support for Alternative Combination #2 (Estrella Route) is noted and will be shared with the CPUC’s decisionmakers.

With respect to the aesthetic impacts of the transition stations under Alternative PLR-3, the Draft EIR (DEIR) text has been revised in the FEIR to more clearly describe the potential effects of the transition stations on aesthetics and visual resources. As shown in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of this FEIR, the text was revised to indicate the extent of oak tree removal that would occur for development of the northern transition station, thereby impacting primarily private views. The revised text also discusses the visual changes brought about by the southern transition station, in light of existing industrial facilities and businesses in this area. (FEIR, Volume 1, pp. 4.1-50 to 4.1-52.) Implementation of Mitigation Measure BIO-4 would further reduce the aesthetic impacts of the northern transition station. The revisions to the visual effects analysis of the transition stations is further discussed in the Response to Comment J-64. Please refer to this comment response for additional information.

With respect to the commenter’s concerns regarding economic effects of the Proposed Project, CEQA requires an analysis of physical impacts to the environment; it does not require analysis of social and economic impacts. Under CEQA, “an economic or social change by itself shall not be considered a significant effect on the environment.” (CEQA Guidelines, §§ 15131, 15382.)

#### **Response to Comment B-7**

The commenter’s support for Alternative Combination #2 for the purpose of reducing biological resource impacts regarding trees and wildlife is noted and will be shared with the CPUC’s decisionmakers.

**Response to Comment B-8**

The comment first states that the DEIR lacks adequate analysis to support the determination that Impact AES-1 would be less than significant with no mitigation measures. Please note that for the purposes of the EIR, designated scenic vistas include open viewsheds and natural landmarks identified in the City of Paso Robles General Plan. The impact discussion under Impact AES-1 has been revised in the FEIR to address these concerns, as well as similar concerns raised in Comments B-11 and I-51. Specifically, the FEIR describes the views along the Salinas River Parkway trail, and provides an analysis of the views from the trail, comparing the Proposed Project to existing, baseline conditions. The FEIR explains that the replacement power line would represent an incremental visual change and would therefore not result in significant aesthetic impacts. Please refer to Responses to Comments B-11 and I-51 for additional detail.

The comment expresses concern that the DEIR does not give adequate descriptions of the proposed pole heights along the proposed 70 kV power line. Table 2-5 in Volume 1 of the FEIR (unchanged from the DEIR) shows both the “Approximate Height Range” and the “Average Height” of each type of pole that would be included as part of the Proposed Project. The text on page 2-59 of the FEIR, Volume 1, refers directly back to these figures in its description of the Proposed Project. Refer to Master Response 3 for additional information regarding the pole heights for the proposed reconductoring segment.

The comment also expresses concern that Figure 4.1-6 of the DEIR shows a significant change to the 46 East Gateway. The comment does not indicate what aspects of the visual simulation included in Figure 4.1-6 indicate a “significant change”, nor does it provide substantial evidence that there is a significant impact that has not been identified in the EIR. Presuming that the significant change is related to the height of the power line poles, this impact is discussed and analyzed under Impact AES-2 in the FEIR (refer to Section 4.1, “Aesthetics,” page 4.1-39 to 4.1-40, in Volume 1 of the FEIR).

The comment also expresses concern that the “project has not been designed to accommodate the Union Road / 46 East overcrossing bridge currently in the Project Approval/Environmental Document (PAED) process (City notice of preparation [NOP] comment #6)” (“Bridge Project”). Refer to Response to Comment B-9 for discussion of this issue. The commenter’s assertion that the design of the SR 46 overcrossing bridge’s fill slopes will require the poles to be taller than shown in the DEIR is noted. With respect to the potential need for taller poles as a result of the Bridge Project, motorists would have views of the proposed 70 kV power line and those that reside in the area might notice the height increase. As described in Table 4.1-1 of the EIR, views of the 70 kV power line route have low-to-moderate rating for visual quality, viewer concern, and visual sensitivity. While the potential increased height of the poles as a result of the Bridge Project is unknown at this time, due to the high speed of travel on the highway, the incremental visual change associated with the taller poles, and the area’s low-to-moderate visual quality and visual sensitivity, the taller poles would not substantially degrade views from a state scenic highway nor would they substantially degrade the existing visual character or quality of public views from SR 46.

**Response to Comment B-9**

This comment describes a concern that four of the Proposed Project’s 70 kV poles may conflict with the current design of the SR 46 overcrossing bridge at Union Road (“Bridge Project”). The

comment states that, due to significant funding constraints, the Bridge Project cannot include the cost to relocate the poles and increase the heights of the poles to provide clearance of the new Union Road alignment, and states that the DEIR did not include analysis of transportation impacts if the bridge is not constructed due to conflicts and cost overruns caused by the Proposed Project's construction. In response to Comment B-9, the text in Section 4.17, "Transportation," (see Volume 1 of the FEIR) has been updated to include information provided by the City of Paso Robles regarding the Bridge Project. Specifically, page 4.17-4 has been revised as follows:

**State Route 46** (SR 46) is the major east-west corridor in San Luis Obispo County that connects the Central Coast to the Central Valley, thus traffic on SR 46 is largely interregional, including substantial recreational, tourist and truck traffic (San Luis Obispo Council of Governments [SLOCOG] 2019). The City of Paso Robles, in collaboration with Caltrans and SLOCOG, is proposing to develop a new State Route 46 overcrossing bridge at Union Road.

Because the proposed Bridge Project is currently in the design phase and is not part of the existing physical environment, the analysis in the EIR remains valid. Potential cost issues associated with the proposed Bridge Project and the Proposed Project are speculative at this time and cannot be analyzed in the EIR.

The changes to the EIR described above would not result in changes to environmental impact analyses or conclusions presented in the DEIR, and therefore do not constitute significant new information that would trigger recirculation under CEQA Guidelines section 15088.5. Rather, the changes serve to clarify and amplify the content of the DEIR.

#### **Response to Comment B-10**

The comment expresses the commenter's opinion that Alternative Combination #2 is preferable to the Proposed Project and argues that the visual impact analysis for the Proposed Project is inadequate. This comment is noted. The commenter's concerns regarding the visual impacts analysis for the Proposed Project are addressed in responses to other comments within this letter, including Comments B-8, B-12, B13, and B-14.

#### **Response to Comment B-11**

The comment states that the DEIR's aesthetic analysis did not address changes to "silhouetted" poles on the Salinas River Bluff near River Road, which is identified in the General Plan Conservation Element as an important Visual Corridor and Natural Open Space Viewshed. The comment indicates that the City has more specific comments regarding the aesthetic impacts of the proposed reconductoring segment of the existing 70 kV power line along River Road in Comments B-12 through B-14.

In response to the first part of the comment, please note that on page 4.1-7 of the FEIR, Volume 1 (unchanged from the DEIR), the discussion under the heading "Scenic Vistas" does list Salinas River as a natural landmark and open space viewshed that is identified in the City of Paso Robles General Plan (2003). The CPUC reviewed the Conservation Element of the City of Paso Robles General Plan and did not see mention of the "Salinas River Bluff" as identified by the commenter. However, Figure C-3 of the General Plan Conservation Element depicts an icon indicating that a natural landmark and open space viewshed are accessible near the Salinas

River Parkway Trail. In response to this comment, the following discussion under Impact AES-1 on page 4.1-38 to 4.1-39 has been revised in the FEIR to describe the effect of the 70 kV power line on views looking toward the river bluff from the Salinas River Parkway Trail.

As described in Section 4.1.4, a scenic vista is generally considered a view of an area that provides expansive views of a highly valued landscape for the benefit of the general public. Within the area of the Proposed Project, several open space viewsheds have been identified by the City of Paso Robles in its General Plan, including the field at the north end of Ramada Drive (between the railroad and Salinas River), oak-covered hillsides, Salinas River, and the view from Barney Schwartz Park southwest toward and into the Chandler Ranch area (City of Paso Robles 2003). In general, construction and operation of the Proposed Project would not substantially affect these scenic vistas, as described further below.

The Estrella Substation would be placed within an existing vineyard and would not ~~affect~~ ~~or~~ substantially obstruct views of oak-covered hillsides that exist throughout the greater Paso Robles area. The Proposed Project's 70 kV power line would not affect the view southwest from Barney Schwartz Park; however, the power line would be visible from Barney Schwartz Park looking to the north. This view and the simulated change following development of the Proposed Project are shown in Figure 4.1-5. As indicated in the figure, there would be little discernable change to the viewshed from this location as a result of the Proposed Project.

The field at the north end of Ramada Drive would be well south of the southern terminus of the Proposed Project's 70 kV reconductoring segment (and on the other side of the Salinas River) and this scenic vista would not be affected.

While the City of Paso Robles General Plan does not specify specific scenic vista points along the Salinas River, the 70 kV power line would be visible from portions of the Salinas River Parkway Trail, which runs parallel to the Salinas River and River Road and offers scenic viewing opportunities of riparian vegetation along the river. Portions of the Proposed Project's 70 kV reconductoring segment that traverse the hillside above River Road would be visible from Salinas River Parkway Trail; other portions of the reconductoring segment would be screened by vegetation and existing landforms. Because existing views from the Salinas River Parkway Trail currently include the existing power line along the Salinas River Bluff, the new replacement poles and power line would represent an incremental, relatively minor visual change.

In general, while the Proposed Project's 70 kV power line may be visible from several viewpoints throughout the City of Paso Robles and surrounding area, the degree of change relative to baseline conditions would be minor and would not substantially affect the scenic views. As a result, this impact would be **less than significant**.

Please also refer to Master Response 3, which includes DEIR text revisions to Impact AES-3 and addresses the Proposed Project's effects on public views from Salinas River Parkway Trail.

The changes to the EIR described above would not result in changes to environmental impact analyses or conclusions presented in the DEIR, and therefore do not constitute significant new

information that would trigger recirculation under CEQA Guidelines section 15088.5. Rather, the changes serve to clarify and amplify the content of the DEIR.

#### **Response to Comment B-12**

The comment alleges that the proposed replacement poles along the reconductoring segment parallel to River Road will be significantly taller than the existing ones and asserts that the DEIR does not evaluate this potential effect. The comment also asserts that the visual simulation along River Glen Drive (shown in Figure 4.1-10 of EIR) is not typical of this segment and is not visible from the Salinas River, US 101, Niblick Bridge, or Downtown area.

See Master Response 3 in response to the commenter's concerns regarding the visual change that would occur with the new poles along River Road. Regarding the commenter's concern about the visual simulation presented along River Glen Drive, as described on page 4.1-2 of Volume 1 of the FEIR, the key observation points (KOPs) provide typical views and/or views of high interest or concern of the Proposed Project and alternatives areas. This viewpoint is intended to provide a typical close-up view of a replaced pole that would be seen along River Glen Drive. While the reconductored alignment would be visible from other areas in the Proposed Project vicinity, the CEQA Guidelines do not require project proponents to prepare simulations from every possible viewpoint from which a project may be visible.

#### **Response to Comment B-13**

The comment states that the DEIR does not provide adequate information on either the existing or proposed pole heights for the public to understand the potential change or visual impact to the neighbors or community.

In response to the commenter's concerns regarding the EIR's evaluation of visual impacts regarding the replacement poles, please refer to Master Response 3.

#### **Response to Comment B-14**

This comment describes the City's recommendation that the replacement metal poles along the reconductored route parallel to River Road be of similar size to existing wood poles. The comment further requests that if it is infeasible for the replacement poles to be of similar height as the existing wood poles, then the EIR must be revised and recirculated with a complete visual impact analysis to the River Road corridor along scenic Salinas River and historic De Anza Trail.

The existing height of poles within the reconductoring segment range from approximately 50 to 80 feet tall. It is important to note that the final heights of the replacement poles will be determined once engineering studies or plans are complete. According to the Preliminary Field Management Plan developed for the Proposed Project, replacement poles in residential areas would be 10 feet taller than necessary to meet clearance requirements to help reduce electromagnetic field (EMF). Additionally, in some instances, poles may need to be taller to support a longer span of the replaced 70 kV power line, common neutral lines, fiber lines, and existing communication lines. As such, replacement poles that are a similar height as the existing wood poles would not adequately achieve the Proposed Project objectives. As discussed in Response to Comment B-8, the increase in height would result in a less-than-significant visual impact, when compared to existing baseline conditions.

Please refer to Master Response 3 regarding the EIR's visual assessment of the replacement poles.

**Response to Comment B-15**

This comment states that the City of Paso Robles wants to ensure the Proposed Project does not have significant or adverse effects on aesthetic or visual resources and introduces two points for the CPUC to consider, addressed in Response to Comments B-16 and B-17.

This comment is noted. EIR Section 4.1, "Aesthetics," concludes that the proposed Estrella Substation and 70 kV power line along the northern segment of Golden Hill Road would result in significant and unavoidable impacts. Please note that the discussion under Impact AES-3 has been revised in the FEIR in response to Comments H-88, I-53, I-55, J-61, J-111 and J-112. Mitigation Measure AES-1 has been revised in response to Comments H-114, J-113, J-114, J-115, J-116, I-55, and I-59. Please see those responses for additional information. Because this comment does not provide any substantive comments on the DEIR's analysis, no additional revisions to the DEIR text have been made. The changes to the EIR described above would not result in changes to environmental impact analyses or conclusions presented in the DEIR, and therefore do not constitute significant new information that would trigger recirculation under CEQA Guidelines section 15088.5. Rather, the changes serve to clarify and amplify the content of the DEIR.

**Response to Comment B-16**

The commenter's opposition to the Proposed Project 70 kV power line alignment and the commenter's support for Alternative Combination #2 (Estrella Route), incorporating Alternative PLR-1A, are noted and will be shared with the CPUC's decisionmakers.

**Response to Comment B-17**

The comment reiterates concerns raised in Comment B-14, which recommends that the replacement poles for the River Road reconductoring route be of similar size to the existing poles. Please see Response to Comment B-14 above.

**Response to Comment B-18**

The City notes its position on the Proposed Project alignment has changed since its May 6, 2019 Alternatives Screening letter. This comment does not raise an environmental issue related to EIR adequacy, and no response is required. The comment is noted and will be shared with the CPUC's decisionmakers.

**Response to Comment B-19**

This comment does not raise an environmental issue related to EIR adequacy, and no response is required. The comment is noted and will be shared with the CPUC's decisionmakers.

**Response to Comment B-20**

This comment does not raise an environmental issue related to EIR adequacy, and no response is required. Thank you for your comment.



**Response to Comment B-21**

The comment presents the 2014 General Plan Conservation Element's Figure C-3, depicting City Gateways, Visual Corridors, Natural Landmarks, and Open Space Viewsheds. The comment is noted and will be shared with the CPUC's decisionmakers.

**Response to Comment B-22**

This comment is the letter that was submitted by the commenter in response to the NOP for the Proposed Project. CPUC considered all scoping comments during preparation of the DEIR.

**Response to Comment B-23**

This comment depicts site plans of the proposed half-clover leaf interchange layout and powerpole conflict analysis shows potential conflicts between the Proposed Project's 70 kV poles and the Bridge Project. Please refer to Response to Comment B-9.

**Letter C: John Peschong, First District Supervisor, San Luis Obispo County (January 13, 2021)**

Letter C



**COUNTY OF SAN LUIS OBISPO**  
**BOARD OF SUPERVISORS**  
 John Peschong *District One Supervisor*

January 13, 2021

Robert Peterson  
 C/O Tom Engels  
 Horizon Water and Environment, LLC  
 266 Grand Avenue, Ste. 210  
 Oakland, CA 94610

RE: Opposition to Estrella Substation and Paso Robles Area Reinforcement Project  
 Alternative SE-PLR-2: Templeton -Paso South River Road Route

Dear Mr. Peterson:

C-1 I previously wrote to you in May 2019 and I would like to reiterate my opposition and concern for the Estrella Substation and Paso Robles Area Reinforcement Project Alternative SE-PLR-2: Templeton -Paso South River Road Route. Of utmost importance to me is public safety. The City of Paso Robles Local Hazard Mitigation Plan and the California Department of Conservation Maps illustrate that the Rinconada Earthquake Fault lies along the length of South River Road and Santa Ysabel Ranch. This is of great concern and should weigh heavy in any decision regarding Alternative SE-PLR-2: Templeton -Paso South River Road Route. I am also greatly concerned about fire risk in this High Fire Risk area. There are thick stands of oak as well as wild grassland that could easily catch fire and threaten neighborhoods along the proposed South River Road Route.

C-2 Alternative SE-PLR-2: Templeton -Paso South River Road Route is considered sensitive for cultural resources due to its proximity to perennial and annual waterways. Preliminary environmental analysis (NEET West and PG&E 2018 b) found that this route is sensitive for biological resources, specifically a high concentration of heritage oak trees along South River road as well as riparian corridors and wetlands that occur on south River Road to the intersection of Santa Ysabel Avenue.

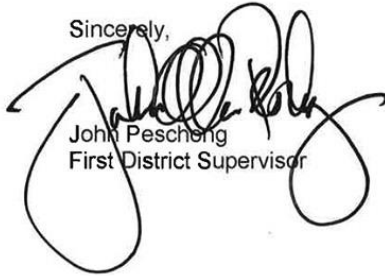
C-4 A new powerline along this route will adversely affect the visual character and the quality of the largely rural-residential area. Due to the scenic quality of this area, the County has previously required new developments in this area to underground their utilities. This route will also pass through more densely developed areas within the City of Paso Robles.

**County of San Luis Obispo Government Center**

1055 Monterey Street, Ste. D430 | San Luis Obispo, CA 93408 | (P) 805-781-5450 | (F) 805-781-1350  
 slocounty.ca.gov

C-5 [ Thank you for your consideration of removing Estrella Substation and Paso Robles Area Reinforcement Project Alternative SE-PLR-2: Templeton -Paso South River Road Route from further consideration. Please feel free to contact me if you have any questions.

Sincerely,



John Pescheng  
First District Supervisor

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**Response to Comment C-1**

This comment states opposition to Alternative SE-PLR-2: Templeton-Paso South River Road Route and identifies safety-related concerns for this alternative. Specifically, the commenter identifies public safety concerns specifically related to the proximity of the Alternative SE-PLR-2 alignment to the Rinconada Fault Line and the Alternative SE-PLR-2's location in a high fire risk area.

For CPUC's response to comments related to the proximity of Alternative SE-PLR-2 to the Rinconada Fault Line, please refer to Master Response 1. For CPUC's response to comments regarding potential increased fire risk from construction and operation of transmission lines associated with Alternative SE-PLR-2, please refer to Master Response 4.

**Response to Comment C-2**

The comment states that Alternative SE-PLR-2 is considered sensitive for cultural resources due to its proximity to perennial and annual waterways. The comment is noted and will be shared with CPUC's decisionmakers. The FEIR describes and addresses this concern in Section 4.5 of Volume 1.

**Response to Comment C-3**

The comment notes that the Alternative SE-PLR-2 route contains sensitive biological resources, particularly a high concentration of heritage oak trees along South River Road as well as riparian corridors and wetlands on South River Road to the intersection of Santa Ysabel Avenue. The commenter's concerns regarding sensitive biological resources are noted and will be shared with the CPUC's decisionmakers. Section 4.4 in Volume 1 of the FEIR describes and addresses the potential for impacts to these biological resources. CPUC provides a response to concerns regarding potential impacts to heritage oaks along the Alternative SE-PLR-2 route in Master Response 10.

**Response to Comment C-4**

The comment states that Alternative SE-PLR-2 will have adverse effects on the visual character and quality of the rural-residential area as well as densely developed areas in Paso Robles. The comment states that the County has previously required new developments in this area to underground their utilities due to the scenic quality of the area. Section 4.1 in Volume 1 of the FEIR provides an analysis of visual impacts that would result from the implementation of Alternative SE-PLR-2. The FEIR acknowledges that visual impacts that would result from this alternative would be significant and unavoidable. In addition, for CPUC's response to concerns about visual impacts, please refer to Master Response 3. With respect to undergrounding of power lines, please refer to Master Response 8.

**Response to Comment C-5**

This comment thanks the CPUC for its consideration of removing Alternative SE-PLR-2 from consideration and offers the commenter's availability for questions, but does not raise an environmental issue related to EIR adequacy, thus, no response is required. Thank you for your comment.