

Letter E: Judy Neuhauser, Audubon Society (January 19, 2021)

Letter E



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

RE: Opposition to SE-PLR-2, Templeton – South River Road Alternative

- E-1 I am writing to express our organization's strong opposition to the installation of high voltage electrical transmission lines through an established wildlife corridor where both bald and golden eagles nest and hunt in and around the lakes and streams on both sides of South River Road. To bisect these nesting and feeding grounds with electrical transmission lines violates both the letter and the spirit of the Bald and Golden Eagle Protection Act that specifically prohibits any individual or organization from "taking" or "disturbing" these protected animals.
- E-2 There is no mitigation for the indisputable fact that active golden eagle nests exist within a few seconds (as the eagle flies) of the proposed route of the SE-PLR-2, Templeton – South River Road Alternative.
- E-3 One of our members has documented previous nesting and fledging activity for the California Natural Diversity Data Base and is documenting the current year's nest. This nest is 320 yards from the proposed South River Road Alternative, another nest is 412 yards, and another is 573 yards. Golden eagles leave these nests on the west side of South River Road to hunt on the east side—a long established pattern that would force them to cross the deadly transmission lines several times each day.
- E-4 On behalf of our Morro Coast Audubon members, I ask the commission to reject the South River Road Alternative and approve a route that poses no danger to the eagle, hawk and owl populations that nest, rear their young, and hunt for food in and around Santa Ysabel lake, Spanish Lakes, the Salinas River and their connecting creeks and streams.

Sincerely,

Judy Neuhauser
 President, Morro Coast Audubon Society

P.O. BOX 1507 • MORRO BAY, CA 93443 • 805-772-1991
<http://www.morrocoastaudubon.org>

Response to Comment E-1

The commenter states their opposition to Alternative SE-PLR-2: Templeton-Paso South River Road Route, expressing concern about the installation of high voltage electrical transmission lines near South River Road where both bald and golden eagles nest and hunt, and states that the lines will violate the Bald and Golden Eagle Protection Act. As described in Response to Comment D-21, Pacific Gas and Electric Company (PG&E) is currently in the process of working with the USFWS to receive a permit under the Bald and Golden Eagle Protection Act to address work activities in areas within golden eagle territories. Additionally, as stated in the FEIR, Volume 1, page 4.4-74, implementation of applicant proposed measures (APMs) BIO-1 through BIO-3, and Mitigation Measures BIO-1 and BIO-3 would ensure that effects to golden and bald eagles would be avoided or minimized during construction and operation of Alternative SE-PLR-2. Mitigation Measure BIO-1 requires pre-construction monitoring and avoidance of sensitive habitats for construction activities. Mitigation Measure BIO-3 contains specific provisions to minimize impacts to raptors, including avoidance of construction activities during nesting season, nesting bird surveys as needed, and implementing an avian protection plan.

In addition, please refer to Master Response 9 for a response to concerns regarding potential impacts to golden eagles.

Response to Comment E-2

The comment states that there is no mitigation for the golden eagle nests that are nearby Alternative SE-PLR-2. Please see Response to Comment E-1 for a discussion of mitigation measures that would avoid or reduce impacts.

Response to Comment E-3

The comment asserts that one member of the Morro Coast Audubon Society documented “previous nesting and fledging activity for the California Natural Diversity Data Base and is documenting the current year’s nest,” of which three nests are allegedly 320, 412, and 573 yards from the Alternative SE-PLR-2. The commenter alleges golden eagles would encounter the Project’s transmission lines on route to nearby hunting locations. As stated in the FEIR, Volume 1, Mitigation Measure BIO-3 would ensure that construction or replacement work would be avoided during the nesting season to the extent feasible. If construction or replacement work were to occur within the nesting season, a no-disturbance nesting buffer would be implemented until the nest is no longer active. If work must occur within the buffer, the biologist designated to the project would coordinate with California Department of Fish and Wildlife (CDFW) and U.S. Forest Service (USFWS) to determine buffer reductions and/or nesting monitoring to avoid impacts to active nests. Additionally, as stated in Response to Comment D-21, PG&E is currently in the process of working with the USFWS to receive a permit under the Bald and Golden Eagle Protection Act to address work activities in areas within golden eagle territories. These measures would avoid or reduce potential impacts to golden eagle nests in the vicinity.

Response to Comment E-4

The commenter requests the CPUC reject the Alternative SE-PLR-2 in favor of an unspecified, alternate route “that poses no danger” to the eagle, hawk, and owl populations nearby the route. This comment does not raise an environmental issue related to EIR adequacy, and no further response is required. Thank you for your comment.

Letter F: Steve Baker, Circle B Springs Homeowners Association (December 14, 2020)**Letter F**

From: [Steve Baker](#)
To: estrellaproject@horizonh2o.com
Cc: [Carey Jeff](#); [Dennis Spoolstra](#); [Don Whitmore](#); [J. C. Bond](#); [JaneJennifer Carey](#); [Penn Sharon&Conrad](#); [Rick; simon3332@sbcglobal.net](#); [tom leatherwood](#); [Victoria Berg](#); [Whitmore Julie](#); [Bruce Dixon](#); [Clara Baker](#); [KATHY/CAM HEWITSON](#); [Jim Dawson \(JDawson@suncommunities.com\)](#); [Kaitlin Butler](#); [Allen Bowman](#); [Anthony Riboli](#); jpeschong@co.slo.ca.us; info@jordancunningham.org; [Steve Martin](#); [Dick McKinley](#); [Leo Castillo](#)
Subject: Letter of Protest re: Estrella Substation and 70kV Transmission Line Project
Date: Monday, December 14, 2020 5:06:02 PM
Attachments: [Letter to CPUC re PG&E.docx](#)
[Letter to PG&E re Proposed Alternate Routes.docx](#)

To all concerned,

F-1 Please see the attached letters regarding the previous protests we have filed with PG&E, Horizon Water and Environment, and the CPUC regarding the current selection of the proposed routing of the 70kV transmission lines. Most specifically the portion proposed to run along the northern section of Golden Hill Road north of Highway 46. As the process for this selection has not changed, these letters are still credible documentation for our reasons to protest.

F-2 As the Chairman of the Circle B Springs Homeowners Association, we have addressed PG&E and the CPUC multiple times (see the aforementioned attached letters plus other previous communications) protesting the selection process used by PG&E and it's contractors for the proposed routing and the substantial impact it will have on our surrounding community. To date, PG&E has not produced viable evidence as to why this proposed routing has been recommended over any of the other seven (7) routes that were part of the original proposal of eight (8) routes.

F-3 Of those other seven proposed routes, there are shorter ones, there are ones that run through open land with little or no housing or industrial elements, there was the potential "battery farm", and a proposal to improve the existing Templeton substation plus more. Yet no response has been given by PG&E as to why any of these other seemingly more viable, less expensive routes with less impact on the community were not selected or recommended? With PG&E as a public utility and the CPUC as a public entity, where is the transparency to the public of the selection process?

F-4 As such, we must once again vehemently protest the current proposed routing as it is one that is detrimental to our community's health and welfare!

Sincerely,
Steve Baker
 Chairman
 CBS HOA

Owner
Circle B Vineyard & Cellars
 Paso Robles, Ca.
 (805) 226-9246

CC:

Assemblyman Jordan Cunningham
SLOC Supervisor John Pschong
PR City Mayor Steve Martin
PR City Public Works Director Dick McKinley
PR City Planning Commissioner Leo Castillo
Cava RV Resort Jim Dawson
Cava RV Resort Kaitlyn Butler
Riboli Family Wines Anthony Riboli
AMMC&G Allen Bowman
CBS HOA Members

Mr. Robert Petersen

August, 18, 2018

California Public Utilities Commission
 C/O Horizon Water and Environment
 400 Capitol Mall, Ste. 2500
 Sacramento, Ca. 95814

Re: **PG&E Proposed Project**
Estrella Substation and 70kV Transmission Line

Dear sir,

F-5 In response to your request made at the August 7th CPUC Scoping Meeting, we are writing this letter to you in protest of the proposed routing of PG&E's 70kV Transmission Line and Estrella Substation Project. The "Union" route that has been presented to the CPUC for approval is not in the best interest of the City of Paso Robles, the San Luis Obispo County or our community. The reasons for making this claim are the impacts that are listed as follows:

F-6 • Aesthetics:
 The original proposal indicated 70' steel towers of which are now shown as 105' Steel Towers, a 30% increase in size that will tower over all the adjacent properties, businesses and residences. This will serve to disrupt our views, property values and our overall "rural lifestyle".

F-7 • Agriculture and Forestry Resources:
 Electrical Magnetic Field long range effect on oak trees and other adjacent flora and fauna is not well documented. Most runs of high voltage transmission lines have the areas below them cleared for fire prevention and maintenance access. None of this is to the benefit of the surrounding areas.

F-8 • Air Quality/Greenhouse Gas Emissions:
 The proposed construction will utilize heavy equipment and helicopters to construct the foundations and install the towers for 6-days per week, 10-hour days for a duration of 7-9 months. The amount of pollution created by all the above has not been calculated into the overall construction package EIR. Also, not included is the amount of dust that will be created by this heavy equipment and especially the helicopters that will contaminate the air with dust known to contain "Valley Fever" spores that are present in the soils. San Luis Obispo County is already experiencing an epidemic number of cases reported of which more than 400 cases were reported in 2017 alone and this year is already at 283

<p>F-8 cont.</p> <p>↑</p>	<p>cases reported in the first six months of 2018! I personally came down with Valley Fever in December of 2017 from dust and others in our community will be needlessly exposed.</p>
<p>F-9</p>	<ul style="list-style-type: none"> • <u>Biological Resources:</u> <p>Our community and more specifically our lake and surrounding riparian habitat is a known refuge for American Bald Eagles, Golden Eagles, Snowy white egrets, migratory waterfowl, foxes, deer, bobcats, mountain lions, coyotes and many more species. The noise and commotion created by the construction alone will serve to drive away all these native species and push them further towards extinction.</p>
<p>F-10</p>	<ul style="list-style-type: none"> • <u>Cultural, Archaeological, Paleontological and Tribal Resources:</u> <p>The area in question is rich in archaeological findings such as whale vertebrae, fossils and Salinan Tribal grounds of which artifacts from villages and camps have been found. Disturbing these areas will serve to further desecrate these resources.</p>
<p>F-11</p>	<ul style="list-style-type: none"> • <u>Geology and Soils:</u> <p>The comments indicated in the “Hydrology and Water Quality” paragraph below will have the same impact for this topic and therefore does not necessitate further discussion.</p>
<p>F-12</p>	<ul style="list-style-type: none"> • <u>Hazards and Hazardous Materials:</u> <p>The aforementioned “Air Quality/Greenhouse Gas Emission” mentions the increased exposure to Valley Fever spores that are present in our soil but also to be considered is the effects of “Electrical Magnetic Fields” (EMF) on persons in close proximity to the proposed lines. Compliance with CPUC’s General Order 95 is not enough as case studies continue to illustrate the consequences of continued exposure to EMF and the medical community has not agreed that any type of exposure is not hazardous to one’s health.</p>
<p>F-13</p> <p>↓</p>	<ul style="list-style-type: none"> • <u>Hydrology and Water Quality:</u> <p>The impact of the proposed construction to be conducted during what will likely be the rainy season will serve to endanger critical watershed areas along with opening the possibility of “tainted water” running into our HOA lake. We have had numerous problems with the construction adjacent to our properties despite Storm Water Prevention Plans (SWPP’s) being in place. The company</p>

F-13 cont.	↑	responsible is still trying to mitigate the pollution that ran into our lake and we feel that PG&E will do no better.
F-14		<ul style="list-style-type: none"> • <u>Land Use and Planning:</u> <p>Access and egress for the construction vehicles will be along private roads (CBS HOA and Cava RV Resort) that are not meant for heavy construction vehicles such as concrete trucks (in excess of 80,000 pounds).</p>
F-15		<ul style="list-style-type: none"> • <u>Mineral Resources:</u> <p>See “Geology and Soils” along with “Hydrology and Water Quality for our concern and comments.</p>
F-16		<ul style="list-style-type: none"> • <u>Noise:</u> <p>The sound of “electricity” flowing through the lines would present an constant source of noise increasing in high humidity and /or rain.</p>
F-17		<p>Also, of concern regarding noise would be the actual construction of the proposed line. The schedule has been indicated to be 10-hours per day, six days per week for a time of 7-9 months.</p>
F-18		<ul style="list-style-type: none"> • <u>Population and Housing:</u> <p>The proposed route of the 70kV line will impact future development of all areas in the vicinity of the transmission lines. Per the City of Paso Robles General Plan, the east side of Paso Robles is the last major area to be developed for both residential and commercial. The installation of these lines in the proposed route will preclude developers and homeowners from considering the adjacent properties and within sight of the lines.</p>
F-19		<ul style="list-style-type: none"> • <u>Public Services (fire, police, schools, parks):</u> <p>The installation of the proposed 105’ towers along the eastern and northern property lines of the Circle B Springs Home Owner’s Association will preclude Cal Fire’s ability to utilize the lake located within our HOA to put out fires. The most recent fire that utilized our lake was on June 13, 2018 at which they entered the lake from the north and exited to the east. This was done so to avoid flying over homes in our community and to take advantage of our prevailing winds. With the installation of the 105’ towers in the proposed locations, Cal Fire would no</p>
	↓	

F-19 cont. ↑ longer be able to access the lake safely and as such, we would lose an important water source for firefighting.

F-20 | • Recreation:
Recreation will be impacted by the installation of the towers by limiting the planned usage within the EMF zones. Why is it that wherever high-powered transmission lines (both PG&E and SCE) are installed, the land usage below is restricted to nurseries and other uses prohibiting inhabitation?

F-21 | • Transportation and Traffic:
The proposed route for the lines will be across Highway 46 East and serve as an eyesore to the Gateway to our City. This will only serve to contradict attempts by the Chamber of Commerce and other businesses from promoting tourism.

F-22 | The greatest impact of traffic associated with the installation of the proposed 70kV line will be during construction. Access and egress to the proposed route will impact the neighborhoods that they will run through with heavy equipment, lane shutdowns and other inconveniences of which we do not want.

F-23 | Also, subsequent maintenance of the lines will be required and again, the only access to most of the line will be on private property and therefore impact the landowners.

F-24 | • Utilities and Service Systems (water, wastewater, solid waste):
The two recent power outages to parts of Templeton and Paso Robles seem to coincidental to have just “happened”. How better to sway the community into approving the installation of a parallel route to prevent such occurrences?

F-25 | To reiterate the stance of the residents of Circle B Springs Home Owner’s Association, this is not a project that will benefit us in any way, shape or form but only impact us and as such, we ask that the CPUC reconsider the proposed route of the 70kV transmission lines along the “Union Route”. There are better choices that may either be shorter and less expensive to PG&E and therefore its constituents and rate payers.

Thank you for your consideration,
Steven Baker
Chairman
Circle B Springs Home Owner’s Association
(805) 226-9246

April 27, 2019

Mr. Rob Peterson
 c/o Tom Engels
 Horizon Water and Environment, LLC
 266 Grand Ave., Ste #210
 Oakland, CA. 94610

Re: Estrella Substation and Paso Robles Area Reinforcement Project (A.17.01-0230) Draft Alternatives Screening Report

Mr. Peterson,

F-26 | I previously wrote to you on August 18, 2018 in response to the August 7, 2018 "CPUC Scoping Meeting" at which time we were present to protest the proposed "PG&E 70kV Transmission Line and Estrella Substation Project". The proposed "Union Route" was to run northerly along Golden Hill Road adjacent to the east side properties of the Circle B Springs Home Owners Association of which I am the chairman. In that letter I addressed why the proposed route was not the best selection based on the sixteen criteria points that the CPUC would judge the merits of the project.

F-27 | We are now in receipt of your "Draft Alternatives Screening Report" dated March 2019 and after reviewing, we would like to offer the following comments:

- F-28 |
- All eight (8) of the proposed alternatives were deemed "*Potentially Feasible*" in Table 3-1. "*Summary of Alternative Screening Analysis Results*" therefore all should be considered.
- F-29 |
- The merits of each proposed alternate route should be reviewed by criteria including public, environmental, economic and aesthetic impacts along with public safety, constructability, community perception, long-term maintenance, sustainability and long-term usability including the amortization of the cost to build and operate over a determined length of time.
- F-30 |
- As noted in the March 2019 report, paragraph 2.1.2 "*Public and Stakeholder Scoping*", the CPUC staff received numerous letters from the General Public, Public Agencies and others at the August 7, 2018 Scoping Meeting protesting the proposed "Union" route.
- F-31 |
- As mentioned further in paragraph 2.1.2, the "*One of the most common generalized comments received was that the proposed overhead power lines should be placed underground*" (Alternative PLR-3). As a retired Project Superintendent and Project Manager for a very large nation-wide construction company, the running of utilities of this nature underground would be a large, lengthy, messy and noisy proposition that would impact adjacent property owners

F-31 cont.	<p>even more so than the construction of steel towers and as such, should be eliminated from consideration. There are not enough benefits to run the transmission lines underground to offset the negative effect on the surrounding neighborhoods.</p>
F-32	<ul style="list-style-type: none"> • In paragraph 2.1.3, the consideration for “Battery Storage” in meeting AB2514 <p style="margin-left: 40px;"><i>This bill (AB2514) would require the CPUC, by March 1, 2012, to open a proceeding to determine appropriate targets, if any, for each load-serving entity to procure viable and cost-effective energy storage systems and, by October 1, 2013, to adopt an energy storage system procurement target, if determined to be appropriate, to be achieved by each load-serving entity by December 31, 2015, and a 2nd target to be achieved by December 31, 2020.</i></p> <p>and the “Energy Storage Procurement Framework” with subsequent implementation by 2020 and installation required by the end of 2024 would seem to be an even more viable option (BS-1, BS-2 or BS-3) given that this is an option already mandated to be developed and constructed, for which plans and/or budget should already be in development in order to meet the prescribed deadlines. Couple that with the continuing advancement of batteries in usability, sustainability, cost and safety, this should be one of the top considerations.</p>
F-33	<ul style="list-style-type: none"> • In the consideration of each of the proposed alternatives, which criteria is going to be most heavily “weighted”? <ul style="list-style-type: none"> ○ If cost, then shorter routes “SE-1 Templeton Substation Expansion” or “SE-PLR-2 Templeton-Paso Robles South River Road Route” would appear to be favored. ○ If less public impact i.e. aesthetics and agricultural resource, then “SS-1 McDonald Ranch Substation Site” along with either “PLR-1C Estrella Route to McDonald Ranch Option 1” or “PLR-1D Estrella Route to McDonald Ranch Option 2” would seem to be more desirable.
F-34	<ul style="list-style-type: none"> ○ As stated in paragraph 2.2 “Alternative Screening Methodology”, the process for evaluation is one that takes into consideration the following primary criteria: <ul style="list-style-type: none"> ▪ <i>Does the alternative accomplish all or most of the basic project objectives?</i> ▪ <i>Is the alternative potentially feasible (e.g., from economic, environmental, legal, social and technical standpoints?)</i> ▪ <i>Does the alternative avoid or substantially lessen any significant effects of the Proposed Project?</i>
F-35	<ul style="list-style-type: none"> ○ As indicated in Table 3-1, the eight proposed alternative routes adequately address each of the criteria albeit some more so than others.

- F-36
- It is our opinion, that the proposed "Union Route" was rushed to judgement to meet deadlines to present a "proposed route" and was not given the same due diligence in respect to the criteria now being used to evaluate the Alternative Routes and as such would not stand up to this same criteria and scrutiny that are being used to judge the Alternative Routes.
- F-37
- It is also our belief that any and all further consideration of the proposed "Union Route" should be dropped in favor of a more universally accepted alternative.
- F-38
- In addressing paragraph 2.2.2 "*Feasibility*", CEQA Guidelines Section 15364 defines feasibility 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.*"
 - It goes further to state "*According to CEQA Guidelines Section 15126.6[f][1], the factors that may be considered when addressing the potential feasibility of alternatives include site suitability, economic viability, availability, availability of infrastructure, general plan consistency, other plans or other regulatory limitations, jurisdictional boundaries, and the project proponent's control over alternative sites.*"
 - Again, it is our opinion that these same considerations were not given in PG&E's determination and/or selection of the proposed "Union Route" given that the complaints from the general public, public agencies and community organizations mirror the guidelines quoted above and as such, is an inferior recommendation.
- F-39
- In closing, we would ask that the CPUC use their established guidelines within the "*Draft Alternatives Screening Report*" (ASR) to review and determine the best possible Alternative to the current proposed "70kV Transmission line: Union Route" so as to better meet the needs of our community, now and in the long term.

Please contact us if you have further questions that we may respond to.

Thank you,

Steve Baker
Chairman
Circle B Springs HOA
(805) 226-9246

Response to Comment F-1

The commenter states they attached previous letters filed regarding the Proposed Project's route along the northern section of Golden Hill Road north of Highway 46 and alleges the letters are still relevant in their opposition. This comment does not raise an environmental issue related to EIR adequacy, and no further response is required. Nevertheless, the commenter's opposition to the Proposed Project is noted and will be shared with the CPUC's decisionmakers.

Response to Comment F-2

The commenter's participation history and communication with the CPUC and the Proposed Project applicants is noted. The CPUC cannot comment on the Applicants' selection process for routing alternatives that may have been previously considered by the Applicants for the Proposed Project. The CPUC has identified a reasonable range of potentially feasible alternatives for consideration in the EIR, as presented in the Alternatives Screening Report (ASR) (see Appendix B in Volume 2 of the FEIR). The alternatives carried forward for full analysis in the EIR, which are the product of this screening process, are described in Chapter 3, *Alternatives Description*, of the FEIR, Volume 1. Please refer to Master Response 8 for a full discussion on the Proposed Project's needs and consideration of Project alternatives.

Response to Comment F-3

The CPUC cannot provide comment as to the Applicants' selection process for routing alternatives that may have been previously considered by the Applicants for the Proposed Project.

The EIR provides the public, responsible agencies, and trustee agencies with information about the potential environmental effects of construction and operation of the project, as proposed by the Applicants. As described in the CEQA Guidelines (California Code of Regulations [CCR] Section 15121[a]), an EIR is an informational document that assesses potential environmental effects of a proposed project, and identifies mitigation measures and alternatives to the project that could reduce or avoid potentially significant environmental impacts. As an informational document used in the planning and decision-making process, an EIR's purpose is not to recommend either approval or denial of a project or its alternatives.

The comment asks about the transparency of the process of selecting project alternatives. As discussed in the FEIR, Volume 1, Section 1.2, the Proposed Project has gone through a full public review process. The CPUC circulated a NOP for the EIR and held a public scoping meeting in August, 2018. CPUC received 43 comment letters during the scoping period. Following the scoping period, the CPUC circulated a draft ASR for public comment. Public comments were considered by the CPUC during the preparation of the final ASR. The DEIR was circulated to the public in December, 2020. The CPUC received public comments regarding the alternatives presented in the DEIR, and these comments will be shared with the CPUC's decisionmakers. For a further discussion of the CPUC's consideration of alternatives, please refer to Master Response 8.

Response to Comment F-4

The comment expresses concern that the proposed routing of the transmission line is detrimental to the community's health and welfare. The comment does not state which aspects of the Proposed Project would be detrimental to community health and welfare. Section 4.9, in

Volume 1 of the FEIR, discusses the potential hazards and hazardous materials impacts that would result from the Proposed Project. Also, please refer to Master Response 2 for a discussion of EMFs and Master Response 4 for a discussion of fire risks. The commenter's opposition to the Proposed Project is noted and will be shared with the CPUC's decisionmakers.

Response to Comment F-5

This comment begins the letter submitted by the commenter in response to the NOP for the Proposed Project in August 2018. This letter contains Comments F-5 through F-25. The CPUC considered all scoping comments submitted on the Proposed Project during preparation of the DEIR as required by CEQA. However, each response is also addressed below.

Response to Comment F-6

The comment notes that the proposed increase in steel tower heights from 70 feet to 105 feet (30 percent increase) would disrupt views, property values, and "rural lifestyle". This comment was considered during preparation of the EIR. The impacts of the proposed 70 kV power line on aesthetics and visual resources are evaluated in Section 4.1, "Aesthetics," of the EIR (see Volume 1 to this FEIR).

Note that CEQA does not require lead agencies to evaluate the potential effects of a proposed project on property values or lifestyle; rather, CEQA is concerned about the analysis and disclosure of physical environmental impacts associated with a proposed project.

Response to Comment F-7

The comment expresses concerns regarding potential impacts on oak trees and other adjacent flora and fauna from EMF. This comment is noted, and was considered during preparation of the EIR. EMFs are discussed in Section 2.9 of the EIR (see Volume 1 of this FEIR). Additionally, the CPUC provides a response to concerns and comments related to EMF submitted on the DEIR in Master Response 2.

Response to Comment F-8

The commenter states that emissions from heavy equipment and helicopters used to construct the foundations and install the towers was not included in the "overall construction package EIR." The commenter states that the amount of dust generated will contaminate the air with Valley Fever spores. The commenter states that San Luis Obispo County is experiencing an epidemic number of cases of Valley Fever.

This comment was considered during preparation of the EIR. In response to concerns regarding construction emissions, refer to Master Response 11. In response to concerns regarding Valley Fever, refer to Master Response 14.

Response to Comment F-9

The comment expresses concern over the noise and commotion caused by construction and the effects on wildlife.

This comment was considered during preparation of the EIR. The EIR contains biological resource protection and noise reduction measures that will reduce construction impacts to

wildlife. Specifically, these measures include requirements for pre-construction surveys (APM BIO-1), nesting bird avoidance (APM BIO-2), biological monitoring (APM BIO-3 and Mitigation Measure BIO-1), special-status species protection (APM BIO-4), monitoring of initial ground-disturbing activities (APM BIO-3 and Mitigation Measure BIO-1), minimization of impacts to raptors and other avian life from transmission and power line facilities (Mitigation Measure BIO-3), and noise minimization (APM BIO-2 and Mitigation Measure NOI-1).

Response to Comment F-10

The commenter's concerns are about disturbing archaeological and paleontological sites. These potential Impacts are addressed in the EIR. APM CUL-2 and Mitigation Measure CR-1 ensures that the Proposed Project will be designed to avoid previously identified cultural resources. Unanticipated discovery of cultural resources during Proposed Project construction would be addressed under APM CUL-3 and Mitigation Measure CR-1. Unanticipated discovery of paleontological resources during Proposed Project construction is addressed under APM PALEO-2.

Response to Comment F-11

The comment references Comment F-13 but as it relates to Geology and Soils (i.e., "will have the same impact for this topic..."). The commenter's general concern for geology and soils and erosion of soils to adjacent water features (e.g., the Circle B Springs homeowners association [HOA] Lake) is noted and will be shared with the CPUC's decisionmakers. The CPUC cannot provide comment as to other construction projects and the "numerous problems" that may have ensued in these areas.

This comment was considered during preparation of the EIR. For a detailed analysis of potential impacts related to geology and soils, refer to Section 4.7, "Geology, Soils, Seismicity, and Paleontological Resources," in Volume 1 of the FEIR. As discussed in Impact GEO-2, implementation of the SWPPP BMPs would ensure that soil stockpiles are protected from storm events and located away from and/or downgradient from waterways, as well as provide for avoidance of excessive disturbance of steep slopes, control of vehicle traffic, and implementation of a dust-control program. Implementation of APM AIR-3, which would require a variety of measures to reduce fugitive dust during construction, would also serve to minimize loss of topsoil and reduce erosion.

Response to Comment F-12

The comment asserts the need to consider the effects of EMF. Additionally, the commenter states that compliance with CPUC's General Order 95 is not enough, given that case studies illustrate potential for exposure and impacts related to human health. This comment was considered during preparation of the EIR. EMFs are discussed in Section 2.9 of the EIR (FEIR Volume 1). The CPUC also provides a response to comments related to EMF submitted on the DEIR in Master Response 2.

Response to Comment F-13

The comment expresses concerns regarding polluted runoff from construction activities entering the HOA's lake. This comment was considered during preparation of the EIR. Potential impacts to hydrology and water quality are evaluated in Section 4.10 of the EIR (FEIR Volume 1). Compliance with the Construction General Permit, including implementation of a stormwater

pollution prevention plan (SWPPP), as well as implementation of APMs HAZ-1 and HYDRO-1, would minimize impacts on hydrology and water quality from Proposed Project construction. The CPUC cannot comment on the problems of other construction contractors implementing SWPPPs in relation to the HOA properties, as noted in the comment.

Response to Comment F-14

The comment states private roads to be used for access during construction are not meant for heavy construction vehicles. At this stage of analysis, final engineering has not been completed. Thus, final construction access routes and plans have not been developed. The capacity of any roads to be used for construction access relative to the weight and size of the equipment would be taken into account during final design and engineering.

Response to Comment F-15

The comment refers the reader to Comments F-11 and F-13 for comments related to Mineral Resources. The CPUC notes that Comments F-11 and F-13 do not mention mineral resources. Responses to Comments F-11 and F-13 are provided above.

Response to Comment F-16

This comment states that the sounds of “electricity” flowing through the lines would be a constant source of noise increasing in high humidity and/or rain. This comment refers to what is known as corona activity, which can generate a small amount of sound energy. This was considered during preparation of the EIR. Potential impacts related to noise caused by corona activity were evaluated in Section 4.13.5 of the EIR. (FEIR, Volume 1, p. 4.13-22.)

Response to Comment F-17

This comment expresses concern over construction noise. This was considered during preparation of the EIR. Potential impacts related to construction noise were evaluated in Section 4.13.5 of the EIR. (FEIR, Volume 1, pp. 4.13-15 to 4.13-20.)

Response to Comment F-18

The comment, under the subheading of “Population and Housing,” expresses concerns regarding the effects of the Proposed Project’s 70 kV power line on future development in Paso Robles. This comment was considered during preparation of the EIR. The effects of the Proposed Project on population and housing are evaluated in Section 4.14 of the EIR (see Volume 1 of this FEIR). Consistent with the requirements of CEQA, the impacts analysis focuses on the impacts to the physical environment (rather than purely economic considerations).

Response to Comment F-19

The comment states that installation of the Proposed Project’s 70 kV power line will preclude California Department of Forestry and Fire Protection’s (CAL FIRE’s) ability to utilize the lake located within the commenter’s HOA to put out fires.

This comment was considered during preparation of the EIR. As described in Section 4.9, “Hazards and Hazardous Materials,” in Volume 1 of this FEIR, the CPUC contacted CAL FIRE during preparation of the EIR to investigate this issue. CAL FIRE indicated that the new power

line would not pose a substantial hazard to helicopters that may access the HOA pond for water supply to fight fires. (FEIR, Volume 1, pp. 4.9-24 to 4.9-25.)

Response to Comment F-20

The comment states that recreation will be impacted by the installation of the towers (70 kV poles) by limiting the planned usage within the EMF zones. Refer to Section 2.9 in Volume 1 of the FEIR for discussion of EMF. Additionally, with respect to comments submitted on the DEIR related to EMF, the CPUC provides a response in Master Response 2.

Response to Comment F-21

Although under a subheading for “Transportation and Traffic,” the comment asserts generally that the Proposed Project would have adverse aesthetic impacts in the Highway 46 East gateway area, which may impact tourism.

The EIR notes that Highway 46 East is considered a visual corridor and gateway in the City of Paso Robles General Plan (see FEIR, Volume 1, p. 4.1-8; Appendix A in Volume 2 of the EIR) and cites General Plan goals and policies designed to protect and enhance visual resources, gateways, and corridors (FEIR, Volume 2, Appendix A). The impacts on aesthetics and visual resources, including on Highway 46 East corridor, from the Proposed Project are evaluated in Section 4.1, “Aesthetics,” of the EIR. (FEIR, Volume 1.)

The commenter’s concerns regarding the impacts of the Proposed Project on tourism are noted. Per CEQA Guidelines Section 15131, “economic or social effects of a project shall not be treated as significant effects on the environment.” CEQA does not require that such effects be evaluated in detail.

Response to Comment F-22

The comment identifies construction traffic as the greatest traffic impact associated with the proposed 70 kV line and describes concerns regarding construction traffic impacts, such as lane closures.

This comment was considered during preparation of the EIR. As described in Section 4.17, “Transportation,” in Volume 1 of this FEIR, HWT and PG&E will be required to implement Mitigation Measure TR-1, which will require preparation and implementation of construction traffic control plans. (FEIR, Volume 1, pp. 4.17-18 to 4.17-19.) This mitigation measure will address construction traffic impacts, including the impacts described in this comment.

Response to Comment F-23

The comment discusses the need for maintenance of the proposed 70 kV line and the potential need to access the line via private property. As described in Chapter 2, *Project Description*, in Volume 1 of the FEIR, the 70 kV power line would be inspected annually by PG&E routine patrols, either from the ground or by helicopter. A detailed inspection of the power lines is typically performed by staff every 2 years (for wood structures) or every 5 years (for lines constructed on steel structures). (FEIR, Volume 1, p. 2-90.) The vehicle trips generated by the Proposed Project during project operation would be limited to personnel conducting periodic inspections and as-needed maintenance/repair activities.

Chapter 2 of the EIR also identifies the need for the project proponents to acquire new easements for the new 70 kV power line segment. (FEIR, Volume 1, pp. 2-62 to 2-63.) A list of properties likely to require new easements and/or acquisition is provided in the Proponent's Environmental Assessment (PEA) (see Appendix H to the PEA¹).

Response to Comment F-24

The comment describes two recent power outages to parts of Templeton and Paso Robles and implies that they may have been intentional to sway public opinion regarding the Proposed Project. The CPUC has no comment on this.

Response to Comment F-25

The comment reiterates general opposition to the Proposed Project and states that there are better choices that may be shorter and less expensive. The EIR analyzed various alternatives that will be considered by the CPUC. For a discussion of the CPUC's consideration of alternatives, please refer to Master Response 8. The commenter's concerns are noted and will be shared with the CPUC's decisionmakers.

Response to Comment F-26

This comment begins the letter that was submitted by the commenter during the Draft ASR review period for the Proposed Project in April 2019. This letter includes comments F-26 through F-39. The CPUC considered all comments submitted on the Draft ASR during preparation of the Final ASR (see FEIR, Volume 2, Appendix B); however, they are also addressed below.

Response to Comment F-27

This comment indicates that the commenter is in receipt of the Draft ASR and introduces the commenter's bulleted list of comments. The comment is noted, and the specific points raised by the commenter are addressed in the following responses.

Response to Comment F-28

The comment states that all alternatives identified as "potentially feasible" in the Draft ASR, Table 3-1, "Summary of Alternative Screening Analysis Results," should be considered. The EIR has provided an analysis of each of these alternatives, with the exception of Alternative BS-1, which was determined to be infeasible subsequent to the Draft ASR circulation. (FEIR, Volume 1.)

Response to Comment F-29

The comment states that each alternative should be reviewed by criteria including "public, environmental, economic and aesthetic impacts along with public safety, constructability,

¹ Available here:

https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Revised_PEAAppendicesOnly_May2017.pdf

community perception, long-term maintenance, sustainability and long-term usability including the amortization of the cost to build and operate over a determined length of time.”

In accordance with CEQA, the EIR reviews each alternative carried forward for detailed analysis for environmental impacts, which includes a consideration of aesthetics and public safety. Each alternative that was considered in the EIR was determined to be feasible in terms of construction and operation. (FEIR, Volume 1, Chapter 3.) CEQA does not require the EIR to consider other factors such as economics, costs, constructability, or community perception.

Response to Comment F-30

The comment states that the CPUC received letters protesting the Proposed Project. The comment does not address substantive environmental concerns, and no further response is necessary.

Response to Comment F-31

The comment states generally that undergrounding of utilities would have impacts on property owners including noise. The EIR analyzed noise impacts associated with undergrounding of transmission lines as part of Alternative PLR-3. (FEIR, Volume 1, pp. 4.13-30 to 4.13-31.) The commenter’s opposition to Alternative PLR-3: Strategic Undergrounding is noted and will be shared with the CPUC’s decisionmakers.

Response to Comment F-32

The comment quotes a passage from the Draft ASR regarding Assembly Bill 2514 with respect to battery storage. The comment emphasizes that battery storage should be pursued as one of the top considerations. Alternatives BS-2 and BS-3, both including battery storage and/or other Distributed Energy Resources (DERs), have been carried forward for analysis in the EIR. Please also refer to Master Response 5 for discussion of battery storage alternatives.

Response to Comment F-33

The comment expresses an opinion that if cost criteria are most heavily “weighted” in considering proposed alternatives, then shorter routes would be “favored.” The comment also expresses an opinion that if aesthetics and agricultural resources are “weighted,” then Alternatives SS-1 (McDonald Ranch² Substation Site), PLR-1C (Estrella Route to McDonald Ranch¹, Option 1), or PLR-1D (Estrella Route to McDonald Ranch¹, Option 2) would be “more desirable.”

The EIR contains a detailed analysis of the alternatives mentioned in this comment with respect to each of the CEQA Guidelines Appendix G resource topics. Additionally, a summary and comparison of the alternatives is provided in Chapter 5, *Alternatives Analysis Summary and Comparison of Alternatives*, in Volume 1 of the FEIR. Cost considerations are discussed in Section 5.4 in Volume 1.

² Note that subsequent to the Draft ASR, the titles of these alternatives were revised to reflect the current ownership: Bonel Ranch.

Response to Comment F-34

The comment cites text from the Draft ASR regarding the criteria for evaluating alternatives. The comment does not address substantive environmental concerns, and no further response is necessary.

Response to Comment F-35

The comment expresses an opinion that some of the alternatives identified as “potentially feasible” in the Draft ASR, Table 3-1, accomplish identified evaluation criteria more than others. The comment does not address substantive environmental concerns, and no further response is necessary.

Response to Comment F-36

The comment expresses an opinion that the “Union Route” (i.e., the Proposed Project 70 kV power line routing) does not meet the evaluation criteria when compared to other alternatives. The comment is noted and will be shared with CPUC’s decisionmakers. The EIR evaluates a range of feasible alternatives along with the Proposed Project, in accordance with the CEQA Guidelines.

Response to Comment F-37

The comment expresses an opinion that the “Union Route” alternative should be dropped from consideration. The comment is noted and will be shared with CPUC’s decisionmakers. The EIR evaluates a range of feasible alternatives along with the Proposed Project, in accordance with the CEQA Guidelines.

Response to Comment F-38

The comment cites text from the CEQA Guidelines regarding evaluating the feasibility of alternatives. The comment is noted and will be shared with CPUC’s decisionmakers. The EIR evaluates a range of feasible alternatives along with the Proposed Project, in accordance with the CEQA Guidelines. The CPUC cannot comment on PG&E’s development of the proposed route prior to submitting the application for a Permit to Construct to the CPUC.

Response to Comment F-39

The letter closes by asking that the CPUC use their established guidelines within the Draft ASR to review and determine the best alternative to meet the needs of the community. This comment, and the entirety of the commenter’s letter on the Draft ASR, was considered in preparing the Final ASR (see Appendix B, Volume 2 of the FEIR), which determined the alternatives that were carried forward for detailed analysis in the EIR. The commenter is referred to Volume 1 of the FEIR; in particular, Chapter 5, *Alternatives Analysis Summary and Comparison of Alternatives*.

Letter G: Grant Helete, Environmental Center of San Luis Obispo (January 28, 2021)**Letter G**

From: [Grant Helete](#)
To: estrellaproject@horizonh2o.com
Subject: Public Comment RE: Estrella Substation and Paso Robles Area Reinforcement Project DEIR
Date: Thursday, January 28, 2021 4:41:04 PM
Attachments: [Public Comment RE SE-PLR-2 Alternative.pdf](#)

Hello,

G-1 [Attached you will find a written comment regarding the SE-PLR-2 Templeton-Paso South River Road Route alternative for the Estrella Substation and Paso Robles Area Reinforcement Project. Please let me know if there are any issues with the pdf file or if anything else is needed to complete the written comment process.

Thank you very much for your attention and consideration,

Grant Helete, Community Organizer
ECOSLO - Environmental Center of San Luis Obispo
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Phone: (805) 544-1777
 Email: trees@ecoslo.org
 Online: www.ecoslo.org

Protecting and preserving San Luis Obispo County's natural beauty since 1971

To Whom It May Concern,

- G-2 [As a representative of the Environmental Center of San Luis Obispo (ECOSLO), I am writing in opposition of the proposed SE-PLR-2 Templeton-Paso South River Road Route alternative for the Estrella Substation and Paso Robles Area Reinforcement Project.
- G-3 [Alternative SE-PLR-2 proposes the construction of high-voltage overhead transmission lines over fault lines that run through a populated area located within a High Fire Hazard Severity Zone as designated by CAL FIRE. Above-ground transmission lines have been responsible for some of the most devastating fires in the history of the United States as a whole, including the infamous Camp Fire—the deadliest and most destructive fire in the history of California. Proposing the installation of this dangerous infrastructure is irresponsible and will greatly increase the potential for wildfire within the project area. As climate change extends the fire season here in California, it is crucial that action is taken to mitigate against the risk of wildfire throughout the state, something that Alternative SE-PLR-2 is in direct opposition of.
- G-4 [In addition to increasing the risk of wildfire, Alternative SE-PLR-2 will result in impacts to local wildlife, native plants, and culturally significant sites. Included among these impacts are the clearing of heritage oaks, an increased threat to known nearby nesting golden eagles from the proposed location of the transmission lines, and the destruction of archeological sites eligible for inclusion in the National Register of Historical Places. The combination of these substantial impacts is unique to Alternative SE-PLR-2 and is not found in any of the proposed alternative combinations to which Alternative SE-PLR-2 is not included in.
- G-5 [As such, ECOSLO is urging the CPUC to reject Alternative SE-PLR-2 and approve a route that is less threatening to public safety, wildlife, cultural resources, and the environment.

Thank you for your attention to this matter,

Grant Helete, Community Organizer
 ECOSLO - Environmental Center of San Luis Obispo

Response to Comment G-1

This comment is an email cover letter introducing the attached comment letter regarding the Alternative SE-PLR-2. This comment does not raise an environmental issue related to EIR adequacy, and no response is required.

Response to Comment G-2

The commenter states opposition to Alternative SE-PLR-2: Templeton-Paso South River Road Route, which is noted and will be shared with the CPUC's decisionmakers. This comment does not raise an environmental issue related to EIR adequacy, and no further response is required.

Response to Comment G-3

This comment expresses concerns over wildfire hazards due to Alternative SE-PLR-2's crossing over fault lines and its location in a High Fire Hazard Severity Zone (HFHSZ), and states that transmission lines would increase fire danger, particularly considering the effects of climate change. For the CPUC's response to comments and concerns related to wildfire risk due to high-voltage transmission lines, please refer to Master Response 4. Additionally, the CPUC's response to concerns regarding the proximity of the Alternative SE-PLR-2 route to the Rinconada Fault Line is provided in Master Response 1.

Response to Comment G-4

This comment raises concerns related to potential impacts to local wildlife (nesting golden eagles), native plants (heritage oaks), and archaeological sites. Significant impacts to archaeological sites are addressed in the EIR, and it is noted that no Native American archaeological sites are known to exist along the Alternative SE-PLR-2 route. However, the area is considered sensitive for Native American resources, and such resources could be revealed during construction. (FEIR, Volume 1, Sections 4.4.4 and 4.5.4.) Unanticipated discovery of cultural resources during construction of Alternative SE-PLR-2 would be addressed under APM CUL-3 and Mitigation Measure CR-1. These measures would require that, in the event of a discovery of unanticipated cultural materials during construction, all construction work within 50 feet of the discovery would cease and the principal investigator would be consulted to assess the find. While avoidance of resources is preferred, if avoidance of the resource is not feasible and the resource is found to be significant, a detailed archaeological treatment plan, designed to ensure that important scientific data contained in the portion(s) of the significant resource targeted for disturbance is recovered, would be developed and implemented by a qualified archaeologist. These measures would ensure impacts to archaeological sites would be less than significant, by ensuring that work would be conducted at a safe distance from the archaeological sites, or that a detailed treatment plan be developed and implemented.

Regarding impacts to heritage oaks, the EIR contains mitigation measures to mitigate impacts to oak trees. Mitigation Measure BIO-4 would require development and implementation of a Habitat Restoration Plan for impacts to blue oak woodland habitat.

Regarding threats to known nearby nesting golden eagles from the proposed Alternative SE-PLR-2 route, please see Master Response 9.

Response to Comment G-5

The comment urges the CPUC to reject Alternative SE-PLR-2 and approve a route “less threatening” to public safety, wildlife, cultural resources, and the environment. The comment does not suggest a particular routing alternative. However, Section 4.9 in Volume 1 of the FEIR discusses the potential hazards and hazardous materials impacts that would result from the Proposed Project and alternatives. Also, please refer to Master Response 2 for a discussion of EMFs and Master Response 4 for a discussion of fire risks. FEIR, Volume 1, Section 4.4 analyzes the potential impacts of each alternative related to wildlife. In addition, please refer to Master Response 9 for a discussion of potential impacts to golden eagles. Section 4.5 of the EIR discusses potential impacts of each route to cultural resources.