

California Public Utilities Commission		2. Project Description			
H-54 cont.	APM No.	Title/Description	Applicability		
			Estrella Substation	Power Line	Distribution Components¹⁰
		qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following: <ul style="list-style-type: none"> ▪ Proper disposal of potentially contaminated soils. ▪ Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. ▪ Emergency response and reporting procedures to address hazardous material spills. ▪ Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit. 			
Hydrology and Water Quality					
HYDRO-1	<u>Avoidance of Sensitive Aquatic Features.</u> The project will be designed to avoid sensitive aquatic features (i.e., jurisdictional wetlands, waters, and riparian areas) to the extent feasible. Specific avoidance strategies include the following: <ul style="list-style-type: none"> ▪ Siting permanent structures in uplands outside of existing drainage features. ▪ Siting staging areas, pole/tower work areas, pull sites, and other temporary staging/materials storage areas in uplands outside of existing drainage features/riparian areas, utilizing developed/urban, agricultural land, or ruderal land in preference to native terrestrial or riparian habitats. 	✓	✓	✓	
Estrella Substation and Paso Robles Area Reinforcement Project Draft Environmental Impact Report		2-108	December 2020 Project 17.010		

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		<ul style="list-style-type: none"> ▪ Selecting access roads and overland travel routes in uplands while avoiding other sensitive features (e.g., steep slopes, rare plant localities, and sensitive wildlife habitats). ▪ Should access or work areas be required through or within jurisdictional wetlands and waters, all regulated activities within jurisdictional wetlands and waters (e.g., waters of the United States and waters of the State) will require regulatory approval/permitting from the appropriate agency including U.S. Army Corps of Engineers [USACE], CDFW, and/or Regional Water Quality Control Board [RWQCB] prior to any work within jurisdictional features. <p>Prior to construction, sensitive aquatic features slated for avoidance will be identified in the field and clearly marked for avoidance using flagging tape, fencing, and/or high-visibility signage. Construction personnel will be trained on feature avoidance marking and associated restrictions.</p>			
	<i>Noise</i>				
NOI-1	<p><u>Construction Schedule Limits.</u></p> <p>The project proponents will limit grading, scraping, augering, and pole installation to 7:00 a.m. to 7:00 p.m. daily. Exceptions for work outside of these hours will follow the notification requirements outlined in APM AG-1.</p>	✓	✓	✓	
NOI-2	<p><u>Noise Minimization.</u></p> <p>The project will incorporate various measures to reduce construction-related noise where feasible using the following methods:</p> <ul style="list-style-type: none"> ▪ Construction equipment will use noise reduction devices that are no less effective than those originally installed by the manufacturer. ▪ Stationary equipment used during construction will be located as far as practical from sensitive noise receptors. 	✓	✓	✓	
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		<ul style="list-style-type: none"> ▪ “Quiet” equipment (i.e., equipment that incorporates noise control elements into the design—compressors have “quiet” models) will be used during construction when reasonably available. 			
Transportation and Traffic					
TR-1	<p><u>Air Transit Control.</u></p> <p>The project proponents will implement the following protocols that pertain to helicopter use during construction:</p> <ul style="list-style-type: none"> ▪ Comply with all applicable Federal Aviation Administration regulations regarding air traffic; ▪ Helicopter operators will coordinate all project helicopter operations with the Paso Robles Municipal Airport before and during project construction; ▪ Coordinate with potentially affected residents or businesses to minimize the duration of necessary work and any resulting inconvenience; and ▪ Implement a congested area plan if the helicopter work will take place in a congested or densely populated area. A congested area is anywhere that includes the presence of the non-participating public. A densely populated area is an area of a city, town, or settlement that contains a large number of occupied homes, factories, stores, schools, and other structures. 	N/A	✓	✓	
<p><u>Notes:</u></p> <p>APM = applicant-proposed measure; CARB = California Air Resources Control Board; CDFW = California Department of Fish and Wildlife; CRHR = California Register of Historical Resources; CNG = compressed natural gas; CPUC = California Public Utilities Commission; LNG = liquefied natural gas; N/A = not applicable; NAHC = Native American Heritage Commission; NOx = oxides of nitrogen; PM = particulate matter; PRC = Public Resource Code; ROG = reactive organic gases; RWQCB = Regional Water Quality Control Board; SF₆ = sulfur hexafluoride; USACE = U.S. Army Corps of Engineers; USFWS = U.S. Fish and Wildlife Service; WEAP = worker environmental awareness program</p>					
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2.9 Electric and Magnetic Fields

2.9.1 Overview

The CPUC does not consider electric and magnetic fields (EMF) to be an environmental issue in the context of CEQA because there is no agreement among scientists that EMF creates a potential health risk and because CEQA does not define or adopt standards for defining any potential risk from EMF.

The weather and the earth’s geomagnetic field cause naturally occurring EMF, while various technological applications, such as communications technologies, personal electronic devices, electric generation and transmission, and radiological imaging cause man-made EMF. EMFs are typically characterized by their wavelength or frequency as either “non-ionizing” or “ionizing”¹¹ radiation, as shown in Table 2-13 below. In general, the higher the frequency of EMFs, the shorter their wavelength, and the shorter the wavelength, the greater the amount of energy is imparted when interacting with physical objects. From this table it can be seen that the EMF from the Proposed Project’s power line would be “non-ionizing.”

Hertz (Hz) is a unit of frequency that is defined as one cycle per second. With respect to EMF, Hz values reflect the rate at which electric and magnetic fields change their direction each second. In the U.S., electric transmission lines typically operate at 60 Hz, which is considered an extremely low frequency (ELF). By comparison, mobile phones operate at between 1.9 and 2.2 billion Hz (gigahertz), while X-rays operate at upwards of 30 X 10¹⁹ Hz (National Cancer Institute 2020).

Table 2-13. Types of EMF Radiation

Radiation Type	Definition	Forms of Radiation	Source Examples
Non-ionizing	Low to mid-frequency radiation which is generally perceived as harmless due to its lack of potency.	Extremely Low Frequency Radiofrequency Microwaves Visual Light	Microwave ovens Computers House energy smart meters Wireless (WiFi) networks Cell phones Bluetooth devices Power lines

¹¹ Ionization is the process by which electrons are freed from atoms or electrons, thereby creating ions or charged particles. Ionizing radiation is radiation that carries enough energy to create ions.

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cont.

Radiation Type	Definition	Forms of Radiation	Source Examples
			Magnetic resonance imaging devices
Ionizing	Mid to high-frequency radiation which can, under certain circumstances, lead to cellular and/or DNA damage with prolonged exposure.	Ultraviolet X-rays Gamma	Ultraviolet light X-rays ranging from 30 X 10 ¹⁶ Hertz (Hz) to 30 X 10 ¹⁹ Hz Some gamma rays

Notes: Hz = Hertz; WiFi = wireless

Source: National Institute of Environmental Health Sciences 2020

Electric Fields

Electric fields from power lines are created whenever the lines are energized, with the strength of the field dependent directly on the voltage of the line creating it. Electric field strength is typically described in terms of kV per meter (kV/m). Electric field strength attenuates (reduces) rapidly as the distance from the source increases. Electric fields are reduced in many locations because they are effectively shielded by most objects or materials such as trees or houses.

Unlike magnetic fields, which penetrate almost everything and are unaffected by buildings, trees, and other obstacles, electric fields are distorted by any object that is within the electric field including the human body. Even trying to measure an electric field with electronic instruments is difficult because the devices themselves will alter the levels recorded.

Magnetic Fields

Magnetic fields from power lines are created whenever current flows through power lines at any voltage. The strength of the field is directly dependent on the current in the line. Magnetic field strength is typically measured in milligauss (mG). Similar to electric fields, magnetic field strength attenuates rapidly with distance from the source. However, unlike electric fields, magnetic fields are not easily shielded by objects or materials. The nature of a magnetic field can be illustrated by considering a household appliance. When the appliance is energized by being plugged into an outlet but not turned on, no current flows through it. Under such circumstances, an electric field is generated around the cord and appliance, but no magnetic field is created. If the appliance is switched on, the electric field would still be present and a magnetic field would also be created. The electric field strength is directly related to the magnitude of the voltage from the outlet and the magnetic field strength is directly related to the magnitude of the current flowing in the cord and appliance.

The magnetic field levels of PG&E’s overhead and underground transmission lines will vary depending upon the customer power usage. Magnetic field strengths for typical PG&E transmission line loadings at the edge of rights-of-way are approximately 10 to 90 mG (NEET West and PG&E 2017). Under peak load conditions, the magnetic fields at the edge of the right-

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of-way would not likely exceed 150 mG. The strongest magnetic fields around the outside of a substation come from the power lines entering and leaving the station. The strength of the magnetic fields from transformers and other equipment decreases quickly with distance, such that beyond the substation fence, these magnetic fields are typically indistinguishable from background levels (NEET West and PG&E 2017).

2.9.2 Scientific Background and Regulations Applicable to EMF

EMF Research

For more than 20 years, questions have been asked regarding the potential effects of EMFs from power lines and research has been conducted to provide some basis for response. Earlier studies focused primarily on interactions with the electric fields from power lines. In the late 1970s, the subject of magnetic field interactions began to receive additional public attention and research levels increased. A substantial amount of research investigating both electric and magnetic fields has been conducted over the past several decades; however, much of the body of national and international research regarding EMF and public health risks remains contradictory or inconclusive.

Research related to EMF can be grouped into three general categories: cellular level studies, animal and human experiments, and epidemiological studies. Epidemiological studies have provided mixed results, with some studies showing an apparent relationship between magnetic fields and health effects while other similar studies not showing such a relationship. Laboratory studies and studies investigating a possible mechanism for health effects (mechanistic studies) provide little or no evidence to support this link.

Since 1979, public interest and concern specifically regarding magnetic fields from power lines has increased. The increase has generally been attributed to publication of the results of a single epidemiological study (Wertheimer and Leeper 1979). This study observed a statistical association between the high-current configuration (the “wire code”) of electric power lines outside of homes in Denver and the incidence of childhood cancer. The “wire code” was assumed to be related to current flow of the line. The study did not take measurements of magnetic field intensity. Since publication of the Wertheimer and Leeper study, many epidemiological, laboratory, and animal studies regarding EMF have been conducted.

Methods to Reduce EMF

EMF levels from transmission lines can be reduced in three primary ways: shielding, field cancellation, or increasing the distance from the source. Shielding, which reduces exposure to electric fields, can be actively accomplished by placing trees or other physical barriers along the transmission line right-of-way. Shielding also results from existing structures the public may use or occupy along the line. Since electric fields can be blocked by most materials, shielding is effective for the electric fields but is not effective for magnetic fields.

Magnetic fields can be reduced either by cancellation or by increasing distance from the source. Cancellation is achieved in two ways. A transmission line circuit consists of three “phases”: three separate wires (conductors) on a transmission tower. The configuration of these three conductors can reduce magnetic fields. First, when the configuration places the three

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conductors closer together, the interference, or cancellation, of the fields from each wire is enhanced. This technique has practical limitations because of the potential for short circuits if the wires are placed too close together. There are also worker safety issues to consider if spacing is reduced. In underground lines, the three phases typically can be placed much closer together than for overhead lines because the cables have dielectric insulation.

The distance between the source of fields and the public can be increased by either placing the wires higher aboveground, burying underground cables deeper, or by increasing the width of the right-of-way. For transmission lines, these methods can prove effective in reducing fields because the reduction of the field strength drops rapidly with distance.

Scientific Panel Reviews


Numerous panels of expert scientists have convened to review the data relevant to the question of whether exposure to power-frequency EMF is associated with adverse health effects. These evaluations have been conducted in order to advise governmental agencies or professional standard-setting groups. These panels of scientists first evaluate the available studies individually, not only to determine what specific information they can offer, but also in terms of the validity of their experimental design, methods of data collection, analysis, and suitability of the authors’ conclusions to the nature and quality of the data presented. Subsequently, the individual studies, with their previously identified strengths and weaknesses, are evaluated collectively in an effort to identify whether there is a consistent pattern or trend in the data that would lead to a determination of possible or probable hazards to human health resulting from exposure to these fields.

These reviews include those prepared by international agencies such as the World Health Organization (WHO), the international Non-Ionizing Radiation Committee of the International Radiation Protection Association, and governmental agencies of a number of countries, such as the U.S. Environmental Protection Agency, the National Radiological Protection Board of the United Kingdom, the Health Council of the Netherlands, and the French and Danish Ministries of Health. As noted below, these scientific panels have varied conclusions on the strength of the scientific evidence suggesting that power frequency EMF exposures pose any health risk.

In May 1999, the National Institute of Environmental Health Science (NIEHS) submitted to Congress its report titled, *Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields*, containing the following conclusion regarding EMF and health effects:

Using criteria developed by the International Agency for Research on Cancer (IARC), none of the Working Group considered the evidence strong enough to label ELF-EMF exposure as a known human carcinogen or probable human carcinogen. However, a majority of the members of this Working Group concluded that exposure to power-line frequency ELF-EMF is a possible carcinogen.

In June 2001, a scientific working group of IARC (an agency of WHO) reviewed studies related to the carcinogenicity of EMF. Using standard IARC classification, magnetic fields were classified as “possibly carcinogenic to humans” based on epidemiological studies. “Possibly carcinogenic to humans” is a classification used to denote an agent for which there is limited evidence of carcinogenicity in humans and less than sufficient evidence of carcinogenicity in experimental animals.

<p>H-54 cont.</p> 	<p style="text-align: center;">California Public Utilities Commission 2. Project Description</p> <p>On behalf of the CPUC, the California Department of Health Services (DHS) completed a comprehensive review of existing studies related to EMF from power lines and potential health risks. This risk evaluation was undertaken by three staff scientists with the DHS. Each of these scientists is identified in the review results as an epidemiologist, and their work took place from 2000 to 2002. The results of this review, titled <i>An Evaluation of the Possible Risks from Electric and Magnetic Fields from Power Lines, Internal Wiring, Electrical Occupations, and Appliances</i>, were published in June 2002. The conclusions contained in the executive summary are provided below:</p> <ul style="list-style-type: none"> ▪ To one degree or another, all three of the DHS scientists are inclined to believe that EMFs can cause some degree of increased risk of childhood leukemia, adult brain cancer, Lou Gehrig’s Disease, and miscarriage. ▪ They strongly believe that EMFs do not increase the risk of birth defects or low birth weight. ▪ They strongly believe that EMFs are not universal carcinogens, since there are a number of cancer types that are not associated with EMF exposure. ▪ To one degree or another, they are inclined to believe that EMFs do not cause an increased risk of breast cancer, heart disease, Alzheimer’s Disease, depression, or symptoms attributed by some to sensitivity to EMFs. However, all three scientists had judgments that were “close to the dividing line between believing and not believing” that EMFs cause some degree of increased risk of suicide. ▪ For adult leukemia, two of the scientists are “close to the dividing line between believing or not believing” and one was “prone to believe” that EMFs cause some degree of increased risk. <p>The report indicates that the DHS scientists are more inclined to believe that EMF exposure increased the risk of the health problems than the majority of the members of scientific committees that have previously convened to evaluate the scientific literature. With regard to why the DHS review’s conclusions differ from those of other recent reviews, the report states:</p> <p style="padding-left: 40px;">The three DHS scientists thought there were reasons why animal and test tube experiments might have failed to pick up a mechanism or a health problem; hence, the absence of much support from such animal and test tube studies did not reduce their confidence much or lead them to strongly distrust epidemiological evidence from statistical studies in human populations. They therefore had more faith in the quality of the epidemiological studies in human populations and hence gave more credence to them.</p> <p>While the results of the DHS report indicate these scientists believe that EMF can cause some degree of increased risk for certain health problems, the report did not quantify the degree of risk or make any specific recommendations to the CPUC.</p> <p>In addition to the uncertainty regarding the level of health risk posed by EMF, individual studies and scientific panels have not been able to determine or reach consensus regarding what level of magnetic field exposure might constitute a health risk. In some early epidemiological studies,</p> <hr/> <p>Estrella Substation and Paso Robles Area 2-115 December 2020 Reinforcement Project Project 17.010 Draft Environmental Impact Report</p>
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increased health risks were discussed for daily time-weighted average field levels greater than 2 mG. However, the IARC scientific working group indicated that studies with average magnetic field levels of 3 to 4 mG played a pivotal role in their classification of EMF as a possible carcinogen.

The 2007 WHO [Environmental Health Criteria 238] report concluded that:

- Evidence for a link between ELF (50 to 60 Hz) magnetic fields and health risks is based on epidemiological studies demonstrating a consistent pattern of increased risk for childhood leukemia. However, "...virtually all of the laboratory evidence and the mechanistic evidence fail to support a relationship between low-level ELF magnetic fields and changes in biological function or disease status...the evidence is not strong enough to be considered causal but sufficiently strong to remain a concern."
- "For other diseases, there is inadequate or no evidence or health effects at low exposure levels."

2.9.3 Policies, Standards, and Regulations

A number of counties, states, and local governments have adopted or considered regulations or policies related to EMF exposure. The reasons for these actions have been varied; in general, however, the actions can be attributed to addressing public reaction to and perception of EMF as opposed to responding to the findings of any specific scientific research.

In 1991, the CPUC initiated an investigation into electric and magnetic fields associated with electric power facilities. This investigation explored the approach to potential mitigation measures for reducing public health impacts and possible development of policies, procedures or regulations. Following is a brief summary of CPUC guidelines and regulatory activity regarding EMF.

CPUC Decision No. 93-11-013

In Decision No. 93-11-013, the CPUC took interim steps to address EMFs related to electric utility facilities and power lines. Based on its investigation of the possible impacts of EMF exposure associated with electric utility installations, the CPUC recommended the following:

- No-cost and low-cost steps to reduce EMF levels;
- Workshops to develop EMF design guidelines;
- Uniform residential and workplace EMF measurement programs;
- Stakeholder and public involvement; and
- Funding for educational and research programs.

In explaining and justifying its decision, the CPUC stated that although the scientific community had not yet isolated the impact, if any, of utility-related EMF exposures on public health, other jurisdictions and agencies have concluded that the best response to EMFs is to avoid

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unnecessary new exposure to EMFs if such avoidance can be achieved at a cost that is reasonable in light of the risk identified. The decision stated that “low-cost” steps to reduce EMF levels should be defined as roughly 4 percent of the total cost of a budgeted project, but emphasized that this should not be a hard-and-fast rule and that utilities should implement more or less costly solutions as they are determined to be effective.

CPUC Decision No. 06-01-042 and More Information

In 2006, the CPUC revisited the EMF issue it had covered in its Decision No. 93-11-013 and affirmed its “low-cost/no-cost” policy for mitigation of EMF exposure for new utility transmission and substation projects. Decision No. 06-01-042 also reaffirmed the CPUC’s policy of using a benchmark of 4 percent of transmission and substation project costs for EMF mitigation. In addition, Decision No. 06-01-042 adopted rules and policies to improve utility design guidelines for reducing EMF, and provided for a utility workshop to implement the policies and standardize design guidelines. Finally, Decision No. 06-01-042 restated the CPUC’s position that it is unable to determine whether there is a significant scientifically verifiable relationship between EMF exposure and negative health consequences.

The CPUC’s EMF Design Guidelines for Electrical Facilities (July 21, 2006) document is available at www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=4884. More information about activities taken by the CPUC with respect to EMFs can be found at: www.cpuc.ca.gov/General.aspx?id=4879.

Attachment 3

Detailed Comment Table

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

Detailed Comment Table

Page #	DEIR Language	Horizon West Transmission Comments
EXECUTIVE SUMMARY		
H-55	ES-2 Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level.	The maximum elevation of substation parcel is approximately 970 feet. Please revise text to read: Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 970 feet above mean sea level.
H-56	ES-4 The 70 kV substation would be located immediately adjacent to the 230 kV substation within the same 15-acre site.	HWT is acquiring a 20-acre parcel Please revise text to read: The 70 kV substation would be located immediately adjacent to the 230 kV substation within the same 15-acre site <u>area of the 20-acre site</u> .
H-57	ES-4 Electrical equipment at the 230 kV substation would be located within a fenced area and would include breakers, breaker-and-a-half bays, operating buses, transformers, air break switches, insulated circuit breakers, dead-end steel structures, and lightning surge arresters.	Please revise text to read: Electrical equipment at the 230 kV substation would be located within an <u>enclosed fenced</u> area and would include breakers, breaker-and-a-half bays, operating buses, transformers, air break switches, insulated circuit breakers, dead-end steel structures, and lightning surge arresters.
H-58	ES-5 Ultimate buildout of the Estrella Substation could include an additional 230 kV interconnection, a second 230/70 kV transformer, three additional 70/21 kV transformers, and associated equipment (e.g., breakers, switches). The ultimate substation buildout would support additional distribution and power lines emanating from the Estrella Substation; however, the specific routes and lengths of these lines are not known at this time and are not evaluated in the DEIR.	Please revise text to read: Ultimate buildout of the Estrella Substation could include an additional 230 kV interconnection, a second 230/70 kV transformer, three additional 70/21 kV transformers, and associated equipment (e.g., breakers, switches). <u>The ultimate substation buildout could also accommodate future inside-the-fence improvements, including the potential future construction of ballistic walls around the transformer or fire walls between the proposed 230 kV transformer and the additional 230 kV transformer.</u> The ultimate substation buildout would support additional distribution and power lines emanating from the Estrella Substation; however, the specific routes and lengths of these lines are not known at this time and are not evaluated in the DEIR.

	Page #	DEIR Language	Horizon West Transmission Comments
H-59	ES-6	Earthwork activities for the substation are anticipated to result in approximately 50,000 cubic yards of cut and fill, which would be balanced on the site to the extent feasible.	<p>Please revise text to read:</p> <p>Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately 50,000 <u>68,000</u> cubic yards of cut and fill, balanced on site to the maximum extent possible. <u>Approximately 16,500 cubic yards of topsoil would be stripped and stockpiled and approximately 4,000 cubic yards of the stockpiled topsoil would be used during restoration, with the balance removed from the site.</u></p>
CHAPTER 1 - INTRODUCTION			
H-60	1-1	Per CEQA Guidelines section 15022, CEQA's basic purposes are to:	<p>The applicable CEQA Guidelines section is 15002.</p> <p>Please revise text to read:</p> <p>Per CEQA Guidelines section 15022 <u>15002</u>, CEQA's basic purposes are to:</p>
CHAPTER 2 - PROJECT DESCRIPTION			
H-61	2-4	Figure 2-1	The 500kV line is north of the 230 kV line, not south as currently depicted in the figure.
H-62	2-15	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level	<p>Please revise text to read:</p> <p>Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to <u>967</u> feet above mean sea level</p>
H-63	2-15	Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to 960 feet above mean sea level.	<p>The maximum elevation of substation parcel is approximately 970 feet.</p> <p>Revise text to read:</p> <p>Topography in the vicinity of the Proposed Project is generally rolling hills, with existing elevations ranging from approximately 920 feet to <u>967</u> feet above mean sea level.</p>
H-64	2-15	Estrella Substation would be located on an approximately 15-acre portion of a 98.6-acre parcel of land. This entire site is currently planted with grape vines of 10-foot-wide span lengths.	Estrella Substation would be located on an approximately <u>15 acres of a 1520</u> -acre site. <u>The site was created from portion of</u> a 98.6-acre parcel of land. This entire <u>20-acre</u> site <u>is and the parcel of land are</u> currently planted with grape vines of 10-foot-wide span lengths.
H-65	2-7	Figure 2-4	The 500kV line is north of the 230 kV line, not south as currently depicted in the figure.
H-66	2-20	Permanent ground disturbance for Estrella Substation is approximately 15 acres, including the area that would be permanently disturbed outside of the 230 kV and 70 kV substation fence lines.	<p>HWT is acquiring a 20-acre parcel.</p> <p>Please revise text to read:</p> <p>Permanent ground disturbance for Estrella Substation is approximately <u>45 20</u> acres, including the area that would be permanently disturbed outside of the 230 kV and 70 kV substation fence lines.</p>

	Page #	DEIR Language	Horizon West Transmission Comments
H-67	2-21	Estrella Substation would be comprised of two separate and distinct substations on an approximately 15-acre site.	HWT is acquiring a 20-acre parcel. Please revise text to read: Estrella Substation would be comprised of two separate and distinct substations on an approximately 15 acres <u>within a 20-acre site</u> .
H-68	2-21	Access to the Estrella Substation site would be off of Union Road, along a new private access road. The access road would be paved up to the second entrance to the 70 kV substation (approximately 715 feet) and have an aggregate-surface up to the 230 kV substation access point and the 70 kV substation would have two separate access points	Please revise text to read: Access to the Estrella Substation site would be off of Union Road, along a new private access road. The access road would be paved up to the second entrance to the 70 kV substation (approximately <u>700+5</u> feet) and have an aggregate-surface up to the 230 kV substation access point and the 70 kV substation would have two separate access points
H-69	2-22	Figure 2-7	Replace figure to include new substation parcel and update temporary and permanent disturbance areas
H-70	2-46	Figure 2-11	Replace figure with new substation layout
H-71	2-47	Figure 2-12	Replace figure with new substation layout
H-72	2-48	Figure 2-13	Replace figure with new substation layout
H-73	2-49	The fenced portion of the 230 kV substation would be approximately 4 acres in size. An approximately 7-foot-tall chain-link fence with an additional 1 foot of barbed wire would be installed around the remaining perimeter of the 230 kV substation.	Please revise text to read: The fenced portion of the 230 kV substation would be approximately 4 acres in size. An approximately 7-foot-tall chain-link fence, <u>a minimum of 7 feet tall</u> , with an additional 1 foot of barbed wire would be installed around the remaining perimeter of the 230 kV substation.
H-74	2-56	The equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation. The anticipated layout of the Estrella Substation at ultimate buildout is shown in Figure 2-18. The additional 230/70 kV transformer under ultimate buildout is assumed to include the same amount of mineral oil (16,000 to 18,000 gallons) as described for the Proposed Project (see Section 2.3.1), and the same secondary containment structure (i.e., designed to allow sufficient freeboard to include the oil volume of the transformer plus the precipitation from a 25-year, 24-hour storm event). The additional 230 kV interconnection is assumed to include similar structures (LSTs) and follow a similar interconnection process to that described for the Proposed Project in Section 2.3.1 under the header for "230 kV Transmission Interconnection." The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.	Please revise text to read: The equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation. The anticipated layout of the Estrella Substation at ultimate buildout is shown in Figure 2-18. The additional 230/70 kV transformer under ultimate buildout is assumed to include the same amount of mineral oil (16,000 to 18,000 gallons) as described for the Proposed Project (see Section 2.3.1), and the same secondary containment structure (i.e., designed to allow sufficient freeboard to include the oil volume of the transformer plus the precipitation from a 25-year, 24-hour storm event). The additional 230 kV interconnection is assumed to include similar structures (LSTs) and follow a similar interconnection process to that described for the Proposed Project in Section 2.3.1 under the header for "230 kV Transmission Interconnection." The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.

	Page #	DEIR Language	Horizon West Transmission Comments
H-75	2-57	The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.	Please revise text as follows: The additional 70/21 kV transformers that may be installed to support additional distribution feeders are assumed to include secondary containment, as necessary to contain spills of any stored mineral oil.
H-76	2-59	Figure 2-18	Replace figure with new substation layout
H-77	2-61	An affiliate of HWT has an option agreement to purchase the approximately 15-acre portion of this parcel. Prior to construction, HWT would purchase and hold fee title of this approximately 15-acre area.	Please revise text to read: An affiliate of HWT has an option agreement to purchase the approximately 15-20 acre portion of this parcel. Prior to construction, HWT would purchase and hold fee title of this approximately 15-20 -acre area. This area is adequate to accommodate the entire <u>approximately 15-acre</u> substation facility including all considerations for site grading, equipment laydown and storage, fencing, access and internal circulation, spill and stormwater management, and other operational considerations.
H-78	2-63	Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately 50,000 cubic yards of cut and fill, balanced on site to the maximum extent possible.	Please revise text to read: Based on preliminary grading design, earthwork activities for the substation are anticipated to result in approximately 50,000 <u>68,000</u> cubic yards of cut and fill, balanced on site to the maximum extent possible. <u>Approximately 16,500 cubic yards of topsoil would be stripped and stockpiled and approximately 4,000 cubic yards of the stockpiled topsoil would be used during restoration, with the balance removed from the site.</u>
H-79	2-64	Access road construction would begin by excavating a maximal depth of 7 feet at the intersection with Union Road, tapering off to 2 feet deep for the remainder of the road.	The least amount of excavation (approximately 2 feet) will occur at the connection to Union Road. The greatest amount of excavation (approximately 17 feet) will be in the area just past the second entrance to the PG&E 70kV yard. Please revise text to read: Access road construction would begin by excavating a-maximal to a depth of <u>approximately 7</u> feet at the intersection with Union Road, tapering-off increasing to <u>217</u> feet deep for the remainder of the road.
H-80	2-73	Table 2-9. Total Approximate Area (acres)—6.20	Please revise text to read: Total Approximate Area (acres)— 6.20 <u>09</u>
H-81	2-74 & 2-75	The two staging areas supporting construction of the substation, totaling 1.9 acres, would be located entirely within the 15-acre permanent disturbance area.	Please revise text to read: The two <u>Estrella Substation</u> staging areas supporting construction of the substation, totaling <u>approximately</u> 1.9 acres, would be located entirely within the 15-20 -acre <u>site permanent-disturbance area</u> .

	Page #	DEIR Language	Horizon West Transmission Comments
H-82	2-77	Permanent and construction access to the proposed substations would be immediately off Union Road on a new private access road. The main access road would be paved and measure about 1,100 feet long and about 20 feet wide.	Please revise text to read: Permanent and construction access to the proposed substations would be immediately off Union Road on a new private access road. The main access road would be paved and measure about 1,4700 feet long and about 20 feet wide.
H-83	2-78	Construction would typically occur 6 days per week (Monday through Saturday) throughout the duration of construction.	Please revise text to read: Construction would typically occur 6 days per week (Monday through Saturday) throughout the duration of construction, <u>although water trucks may be operated on Sundays for fugitive dust control in compliance with the Construction Activity Management Plan.</u>
H-84	2-88	Table 2-11. Anticipated Permits and Approvals and Applicable Regulatory Requirements.	Some equipment, such as the 230/70kV transformer and the control house, may require Caltrans Transportation Permit for transporting oversize/overweight equipment. As such, please revise Table 2-11 to include Caltrans Transportation Permits.
CHAPTER 3 – ALTERNATIVES DESCRIPTION			
H-85	3-4	The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (approximately 15,290 gallons) as the Proposed Project.	The proposed Estrella substation would use between 16,000 to 18,000 gallons of mineral oil. Please revise text to read: The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (between approximately 15,290 <u>16,000-18,000</u> gallons) as the Proposed Project.
H-86	3-91	The quantity of mineral oil to be used for transformers for Alternative SE-1A would be the same (approximately 15,290 gallons) as the Proposed Project.	The proposed Estrella substation would use between 16,000 to 18,000 gallons of mineral oil. Please revise text to read: The quantity of mineral oil to be used for transformers for Alternative SS-1 would be the same (between approximately 15,290 <u>16,000-18,000</u> gallons) as the Proposed Project.
CHAPTER 4 – ENVIRONMENTAL ANALYSIS			
AESTHETICS			
H-87	4.1-3	The proposed Estrella Substation site occupies an approximately 15-acre area to the north of Union Road.	HWT is acquiring a 20-acre parcel. Please revise text to read: The proposed Estrella Substation site occupies an approximately <u>15</u> acres of a <u>20</u> -acre site to the north of Union Road.

	Page #	DEIR Language	Horizon West Transmission Comments
H-88	4.1-39	Construction of the new substation would occur on a 15-acre parcel adjacent to Union Road.	HWT is acquiring a 20-acre parcel. Please revise text to read: Construction of the new substation would occur on <u>approximately 15 acres within a 20-acre parcel</u> adjacent to Union Road.
H-89	4.1-46	General comment regarding SS-1 analysis	The analysis does not adequately consider permanent impacts to the visual character. SS-1 would be sited directly adjacent to the Estrella River. While the viewer concern and exposure may in fact be lower at this site than the Estrella site, the analysis undervalues the visual sensitivity of this scenic area and neglects consideration of the substantial degree that this substation would contrast with and dominate the landscape from an aesthetics perspective.
H-90	4.1-50	This alternative site would result in less adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is already characterized by electrical infrastructure.	Average daily traffic is greater along El Pomar Drive than along Union Road adjacent to the proposed substation. Therefore, viewer exposure would be greater than the Estrella substation. Additionally, the interconnection line would be longer than the interconnection line for the Estrella substation. While it is true that the substation expansion area is directly adjacent to an existing substation, the expanded substation would be constructed on undeveloped land and would require the removal of oak trees and other vegetation. As such, the visual dominance of the substation would increase. For these reasons, aesthetic impacts would be similar to the Estrella substation. Please revise text to read: This alternative site would result in <u>less similar</u> adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is already characterized by electrical infrastructure.
H-91	4.1-50	Development of the substation at the Bonel Ranch site would substantially alter the visual character of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities.	The analysis under criterion B never identifies that impacts would be significant, contrary to the proposed Estrella substation and Alternative SE-1A. Please revise text to read: Development of the substation at the Bonel Ranch site would substantially alter the visual character <u>or quality</u> of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities, <u>which would be a significant impact.</u>

Page #	DEIR Language	Horizon West Transmission Comments															
AGRICULTURE AND FORESTRY RESOURCES																	
H-92 4.2-4	Table 4.2-1. FMMP Acreage at the Estrella Substation Site	Update table to account for the Important Farmland on the 20-acre parcel as follows: <table border="1"> <thead> <tr> <th>Type</th> <th>Percentage</th> <th>Acres</th> </tr> </thead> <tbody> <tr> <td>Importance</td> <td>3.13</td> <td>0.626</td> </tr> <tr> <td>Grazing Land</td> <td>2.28</td> <td>0.456</td> </tr> <tr> <td>Statewide Importance</td> <td>13.12</td> <td>2.624</td> </tr> <tr> <td>Unique</td> <td>81.47</td> <td>16.294</td> </tr> </tbody> </table>	Type	Percentage	Acres	Importance	3.13	0.626	Grazing Land	2.28	0.456	Statewide Importance	13.12	2.624	Unique	81.47	16.294
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Grazing Land	2.28	0.456															
Statewide Importance	13.12	2.624															
Unique	81.47	16.294															
H-93 4.2-4	As shown in Table 4.2-1, approximately 17 percent (2.66 acres) of the site is Farmland of Statewide Importance, while 77 percent (11.70 acres) is Unique Farmland and a small percentage is Farmland of Local Importance and Grazing Land.	Please revise text to read: As shown in Table 4.2-1, approximately 17 13 percent (2.626 acres) of the site is Farmland of Statewide Importance, while 77 approximately 81 percent (16.30 4.70 acres) is Unique Farmland and a small percentage is Farmland of Local Importance and Grazing Land.															
H-94 4.2-2	Table 4.2-2. Agricultural Land Impacts from the Proposed Project	Update table to account for the disturbance to the 20-acre parcel as follows: <table border="1"> <thead> <tr> <th>Type</th> <th>Percentage</th> <th>Acres</th> </tr> </thead> <tbody> <tr> <td>Importance</td> <td>3.13</td> <td>0.626</td> </tr> <tr> <td>Grazing Land</td> <td>2.28</td> <td>0.456</td> </tr> <tr> <td>Statewide Importance</td> <td>13.12</td> <td>2.624</td> </tr> <tr> <td>Unique</td> <td>81.47</td> <td>16.294</td> </tr> </tbody> </table>	Type	Percentage	Acres	Importance	3.13	0.626	Grazing Land	2.28	0.456	Statewide Importance	13.12	2.624	Unique	81.47	16.294
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H-95 4.2-14	As described in the PEA, based on the utility exemption in the Williamson Act, the approximately 15-acre substation site would be created as a separate legal parcel and removed from the larger 98-acre Williamson Act contract.	HWT is acquiring a 20-acre parcel. Please revise text to read: As described in the PEA, based on the utility exemption in the Williamson Act, the approximately 15 20-acre substation site would be created as a separate legal parcel and removed from the larger 98-acre Williamson Act contract.															
H-96 4.2-15	Therefore, the reduction of the current 98-acre Williamson Act parcel down to 83 acres would not disqualify the proposed 15-acre substation parcel as an agricultural preserve according to San Luis Obispo County.	HWT is acquiring a 20-acre parcel. Please revise text to read: Therefore, the reduction of the current 98-acre Williamson Act parcel down to 83 acres would not disqualify the proposed 15 20-acre substation parcel as an agricultural preserve according to San Luis Obispo County.															

	Page #	DEIR Language	Horizon West Transmission Comments
H-97	4.2-15	However, placing the substation within the existing parcel under Williamson Act contract would conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use.	<p>California Government Code §51238 states that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Further, as noted in the DEIR, removing the proposed substation parcel from the 98-acre Williamson Act would not disqualify the remaining contracted area from an agricultural preserve. The remaining land under the modified contract will continue to be cultivated and will limit land uses to compatible uses as outlined by the County's Rules of Procedure, and the remaining parcel will exceed the 40-acre minimum parcel size specified in the original contract. As such, HWT disagrees with the conclusion that placing the substation within the existing parcel under Williamson Act contract would conflict with the Williamson Act contract.</p> <p>Please revise text to read:</p> <p><u>However, p</u>lacing the substation within the existing parcel under Williamson Act contract would <u>not</u> conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use, <u>because Government Code Section 51238 specifies that "the erection, construction, alteration, or maintenance of gas, electric, water, communication, or agricultural laborer housing facilities are hereby determined to be compatible uses within any agricultural preserve." Removing the proposed substation parcel from the 98-acre Williamson Act would not disqualify the remaining contracted area from an agricultural preserve, and the remaining parcel will exceed the 40-acre minimum parcel size specified in the original contract.</u></p>
H-98	4.2-17	The Bonel Ranch parcel is not under a Williamson Act contract; therefore, there would be no potential to conflict with a Williamson Act contract. As a result, impacts under significance criterion B would be less than significant	<p>According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract.</p> <p>Please revise text to read:</p> <p>The Bonel Ranch parcel is <u>not under</u> <u>subject to</u> a Williamson Act contract; therefore, <u>placing the substation within the existing parcel under Williamson Act contract would conflict with that contract, including its underlying intent, which is to preserve agricultural land in agricultural use to the same extent as the Proposed Project.</u></p>
AIR QUALITY			
H-99	4.3-17	Even with the implementation of APM measures, construction-related ROG and NOX emissions threshold exceedances would be considered a significant impact. Mitigation Measure AIR-1 is proposed to reduce potentially significant impacts, requiring implementation of SLOCAPCD standard mitigation measures, BACT, and preparation of a site-specific CAMP that must be reviewed and approved by the APCD prior to the start of construction. The CAMP would be a comprehensive document that captures all pollutant emission reduction measures to be implemented for the approved project. Approval by the APCD would ensure all feasible and appropriate mitigation measures have been incorporated.	Construction related emissions following implementation of APM-1 through APM-3 and Mitigation Measure AIR-1 were not estimated in the EIR. Mitigated emissions should be estimated to support this finding.
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	Page #	DEIR Language	Horizon West Transmission Comments
BIOLOGICAL RESOURCES			
H-100	4.4-9	Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be "rare, threatened, or endangered in California" (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected in California.	The applicable CFGC section should be referenced. Please revise text to read: Special-status species include (1) species listed, or that are candidates for future listing, as threatened or endangered under the federal ESA or CESA; (2) plants listed as rare under NPPA; (3) plants considered by the CNPS to be "rare, threatened, or endangered in California" (CNPS Rare Plant Ranks 1 and 2); (4) species that meet the definitions of rare or endangered under CEQA; (5) animals fully protected in California under the CFGC, and (6) nesting raptors protected in California <u>under California Fish and Game Code Section 3503 et seq.</u>
H-101	4.4-42	Crotch's bumble bee, which utilize rodent burrows, tufts of grass, old bird nests on the ground, rock piles, or cavities in dead trees for nest construction, has potential to occur within the Proposed Project area. Direct impacts to Crotch's bumble bee could occur if rodent burrows within the Proposed Project disturbance area were utilized as nests and destroyed through construction activities. Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally, implementation of APMs BIO-3 and GEN-1 would further reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals identified during pre-construction surveys or during the course of construction activities.	While preconstruction surveys would help avoid and minimize impacts to special-status species, surveying rodent burrows for the state candidate endangered Crotch's bumblebee within the project footprint is impracticable due to the abundance of burrow systems and absence of protocol survey guidance for identification of nest colonies. Current review of iNaturalist (https://www.inaturalist.org/taxa/271451-Bombus-crotchii accessed: January 4, 2021) show observation of the species occurring south and southeast of Santa Maria. The document recognizes the potential of species occurrence in the region, but little is known about its current distribution, hibernacula, or overwintering sites, and direct impacts cannot be adequately concluded due to the lack of this information. Applicants are required to follow all provisions of CESA in regard to California candidate or listed species, but are not specifically required to "notify and coordinate with CDFW" on any candidate or listed species identified during pre-construction surveys. Please revise text to read: Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally, implementation of APMs BIO-3 and GEN-1 would further reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals identified during pre-construction surveys or during the course of construction activities.

	Page #	DEIR Language	Horizon West Transmission Comments
H-102	4.4-44	Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts would be significant.	<p>Please revise text to read:</p> <p>Construction could disturb breeding and nesting birds in the area by generating noise, creating visual distractions, or having a direct impact on occupied nests (e.g., vegetation removal or nest abandonment) and burrows (used by burrowing owls). Uncovered pipes or conduit could be used as nesting habitat for birds, and if left uncovered, birds could become trapped. Removal and disturbance of vegetation and trees along the proposed 70 kV power line route could directly impact foraging and nesting habitat for special-status birds. There is a higher potential for impacts during the nesting/breeding season for birds because of the potential effects on reproductive success and young. Without implementation of preventative measures, these impacts may be would be significant.</p>
GEOLOGY, SOILS, SEISMICITY, AND PALEONTOLOGICAL RESOURCES			
H-103	4.7-35	Further, design and construction requirements in G.O. 95 and 174, as well as the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils, ensuring the potential for such impacts would be less than significant.	<p>G.O. 95 does not apply to substations.</p> <p>Please revise text to read:</p> <p>Further, design and construction requirements in G.O. 95 and 174, as well as and the CBC, would minimize hazards associated with unstable geologic units/soils or expansive soils, ensuring the potential for such impacts would be less than significant.</p>
HAZARDS AND HAZARDOUS MATERIALS			
H-104	4.9-7	Estrella Substation would be located on approximately 15 acres of land that is currently under agricultural cultivation as a vineyard.	<p>HWT is acquiring a 20-acre parcel.</p> <p>Please revise text to read:</p> <p>Estrella Substation would be located on approximately 20 acres that is currently under agricultural cultivation as a vineyard.</p>
LAND USE AND PLANNING			
H-105	4.11-2	The substation would be constructed on an approximately 15-acre site, carved out of a 98-acre parcel of land designated as agriculture and currently being used as a vineyard (one of five contiguous parcels operated by Steinbeck Vineyards & Winery).	<p>HWT is acquiring a 20-acre parcel.</p> <p>Please revise text to read:</p> <p>The substation would be constructed on an approximately 15 acres within a 20-acre site, carved out of a 98-acre parcel of land designated as agriculture and currently being used as a vineyard (one of five contiguous parcels operated by Steinbeck Vineyards & Winery).</p>

	Page #	DEIR Language	Horizon West Transmission Comments
	PUBLIC SERVICES		
H-106	4.15-11	Therefore, the Proposed Project would not require the construction of new or expanded school facilities, which could result in substantial adverse physical environmental effects. This impact would be less than significant.	<p>The project would not directly or indirectly induce population growth and would not require the relocation of non-local construction workers given the limited nature of construction activities. Therefore, there is no basis for the less than significant determination on schools and this impact should be changed to no impact, as described in the PEA.</p> <p>Please revise text to read:</p> <p>Therefore, the Proposed Project would not require the construction of new or expanded school facilities, which could result in substantial adverse physical environmental effects. This impact would be less than significant. No impact would occur.</p>
	TRANSPORTATION		
H-107	4.17-23	The number of construction vehicle trips and the frequency of the trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3).	<p>Construction of BS-1 will be longer in duration than the propped Estrella substation. Therefore, construction related effects would last longer.</p> <p>Please revise text to read:</p> <p>The number of construction vehicle trips and the frequency of the trips for Alternative SS-1 is estimated to be the same as for the Proposed Project (see Table 4.17-3). However, the effects of construction related transportation impacts would last longer due to the longer construction schedule for Alternative SS-1.</p>
H-108	4.17-27	The number of construction vehicle trips and the frequency of the trips for Alternative SE-1A is estimated to be the same as for the Proposed Project (see Table 4.17-3).	<p>Construction of SE-1A will be longer in duration than the propped Estrella substation. Therefore, construction related effects would last longer.</p> <p>Please revise text to read:</p> <p>The number of construction vehicle trips and the frequency of the trips for Alternative SE-1A is estimated to be the same as for the Proposed Project (see Table 4.17-3). However, the effects of construction related transportation impacts would last longer due to the longer construction schedule for Alternative SS-1.</p>
	WILDFIRE		
H-109	4.20-5	The proposed Estrella Substation would be located on approximately 15 acres of land within an existing vineyard.	<p>HWT is acquiring a 20-acre parcel.</p> <p>Please revise text to read:</p> <p>The proposed Estrella Substation would be located on approximately 15 acres acres within a 20 acres of land site within an existing vineyard.</p>
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H-110	<p>Construction and operation of the reasonably foreseeable distribution components, including installation of the 21/12 kV pad-mounted transformer, and ultimate buildout of Estrella Substation, would not be expected to substantially exacerbate wildfire risks, such that people would be exposed to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, and/or people or structures would be exposed to significant risks (e.g., downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes.) Construction and operation activities would be on a much smaller scale than that of the Proposed Project, and similar to the Proposed Project, would occur within areas under irrigated agriculture cultivation (generally a low fire risk land use) or road rights-of-way. Construction and operation activities would comply with the PRC wildland fire safety requirements for grass- and brush-covered lands, as well as the California Fire Code. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would need to comply with applicable vegetation clearance requirements (see Section 4.20.2; fire prevention standards for electric utilities) and would not be located in high fire risk areas or the SRA (apart from one pad-mounted transformer that would be located on the border of the SRA). Therefore, impacts under significance criteria B and D would be less than significant.</p>	<p>Please revise text to read:</p> <p>Construction and operation of the reasonably foreseeable distribution components, including installation of the 21/12 kV pad-mounted transformer, and ultimate buildout of Estrella Substation, would not be expected to substantially exacerbate wildfire risks, such that people would be exposed to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, and/or people or structures would be exposed to significant risks (e.g., downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes.) Construction and operation activities would be on a much smaller scale than that of the Proposed Project, and similar to the Proposed Project, would occur within areas under irrigated agriculture cultivation (generally a low fire risk land use) or road rights-of-way. Construction and operation activities would comply with the PRC wildland fire safety requirements for grass- and brush-covered lands, as well as the California Fire Code. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would need to comply with applicable vegetation clearance requirements (see Section 4.20.2; fire prevention standards for electric utilities) and would not be located in high fire risk areas or the SRA (apart from one pad-mounted transformer that would be located on the border of the SRA). Therefore, impacts under significance criteria B and D would be less than significant.</p>
CHAPTER 5 – ALTERNATIVES ANALYSIS SUMMARY AND COMPARISON OF ALTERNATIVES		
H-111	<p>5-11 Additionally, while the Bonel Ranch site is currently in agricultural use (alfalfa production), it is not on land classified as one of the protected categories of Important Farmland under CEQA (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland); thus, placing the substation at this location would reduce the Proposed Project's significant impacts on agriculture resources.</p>	<p>According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract.</p> <p>Please revise text to read:</p> <p>Additionally, while the Bonel Ranch site is currently in agricultural use (alfalfa production) <u>and is subject to Williamson Act contract</u>, it is not on land classified as one of the protected categories of Important Farmland under CEQA (Prime Farmland, Farmland of Statewide Importance, or Unique Farmland); thus, placing the substation at this location would reduce the Proposed Project's significant impacts on agriculture resources.</p>
CHAPTER 6 – OTHER STATUTORY CONSIDERATIONS AND CUMULATIVE IMPACTS		
H-112	<p>6-13 Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant on their own.</p>	<p>This statement conflicts with the findings from the Aesthetics analysis. As described therein, the DEIR found significant impacts for SS-1, PLR-1A, and PLR-1C. Mitigation was identified to reduce impacts to less than significant. As such, these alternatives are not less than significant on their own.</p> <p>Please revise text to read:</p> <p>Other alternatives, as well as the reasonably foreseeable distribution components, would have adverse aesthetic effects (related to the addition of utility infrastructure), although these effects would be less than significant <u>with implementation of mitigation on their own</u>.</p>

	Page #	DEIR Language	Horizon West Transmission Comments
H-113	6-21	None of the other alternatives, nor the reasonably foreseeable distribution components, would significantly affect agricultural resources at the project level.	<p>According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract.</p> <p>According to the San Luis Obispo County Land Use View GIS mapper, the SS-1 parcel is under a Williamson Act contract. The cumulative analysis should be revised to account for this impact.</p>
APPENDIX F — MMRP			
H-114	MM AES-1	<p>HWT and PG&E shall implement the following measures:</p> <ul style="list-style-type: none"> Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation. For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk. At the substation, incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown) in order to minimize visual contrast. 	<p>The 230 kV yard would be most visible to motorists along its southeastern perimeter fronting Union Road. As such, the measure should be revised to limit the installation of chain link fence slats to this portion of the substation's perimeter.</p> <p>Please revise text to read:</p> <p>HWT and PG&E shall implement the following measures:</p> <ul style="list-style-type: none"> Incorporate drought- and fire-resistant native shrubs within the hardscape landscaping proposed in APM AES-1 between Union Road and the Estrella Substation. For alternative substation sites, incorporate drought- and fire-resistant shrubs between the adjacent roadway and the substation. Coordinate with CAL FIRE / County Fire Department to ensure that any shrubs used in landscaping adjacent to the substation do not substantially increase fire risk. At the substation's <u>southeastern perimeter fronting Union Road</u>, incorporate chain link fence slats using natural colors that are compatible with the surrounding area (i.e., green, light brown) in order to minimize visual contrast.

Page #	DEIR Language	Horizon West Transmission Comments
H-115 MM AG-1	<p>HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall contribute sufficient funds (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives. The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California through the use of agricultural conservation easements. The amount of HWT's and PG&E's contribution shall ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.</p>	<p>As explained in more detail in HWT's comment letter, MM AG-1 needs to be revised to allow HWT and PG&E to utilize other comparable mitigation measures that would achieve conservation easements for important farmland, such as through agreements with landowners to establish and record a conservation easement, or through contributions to a local agency to achieve the agricultural land conservation MM AG-1 also needs to be revised to recognize that PG&E and HWT will have different contribution amounts that are based on their respective impacts to Important Farmland. For these reasons, please revise the text to read:</p> <p>HWT and PG&E, prior to the completion of Proposed Project or alternative construction, shall <u>finalize and effectuate any combination of the following as long as the total acreage in the aggregate equals the amount required by the conservation ratio specified below, either (1) contribute sufficient funds, in an amount equal to the fair market value (determined as of the date construction commenced) of each acre for which the contribution is made, (i.e., adequate to support the conservation ratio described below)</u> to the California Farmland Conservancy Program to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives <u>or to another public agency or non-profit organization able to achieve long-term preservation of agricultural lands in San Luis Obispo County; and/or (2) enter into and record one or more conservation easements with landowners for specific farmland in San Luis Obispo County.</u> The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California through the use of agricultural conservation easements <u>and is one potential recipient of any contribution in clause (1) above.</u> The <u>acreage for which amount of HWT's and PG&E's contributions are made in clause (1) above, together with any acreage preserved through recorded conservation easements in clause (2) above,</u> shall <u>equal a minimum total ensure the conservation</u> of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by <u>their respective components associated with the</u> Proposed Project or alternatives. <u>based on the market price for the commensurate agricultural land at the time that the impacts occur.</u></p>
H-116 APM BIO-1.	<p>Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants</p>	<p>The title of APM BIO-1 does not match the title of APM BIO-1 in Table ES-1 and Table 2-12.</p> <p>Please revise text to read:</p> <p><u>Table F-1: APM BIO-1. Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants Conduct Pre-Construction Survey(s) for Special-Status Species and Sensitive Resource Areas</u></p>

	Page #	DEIR Language	Horizon West Transmission Comments
H-117	MM BIO-1	Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.	<p>Please revise text to read:</p> <p>Wildlife Protection from Work Areas: In addition to the requirements of APM BIO-4, HWT/PG&E shall retain a CPUC-approved biologist to inspect all <u>uncovered and unfenced</u> steep trenches and excavations during construction twice daily (i.e., morning and evening) to monitor for wildlife entrapment.</p>
H-118	MM BIO-1	Weekly biological construction monitoring reports shall be prepared and submitted to the appropriate permitting and responsible agencies throughout the duration of the ground-disturbing and vegetation-removal construction phase.	<p>Reports will be submitted to the to the CPUC only since no permits are held with regulatory agencies.</p> <p>Please revise text to read:</p> <p>Weekly biological construction monitoring reports shall be prepared and submitted to the <u>CPUC appropriate permitting and responsible agencies</u> throughout the duration of the ground-disturbing and vegetation-removal construction phase.</p>
H-119	MM BIO-1	Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction. Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.	<p>Gravel bags and erosion and sediment controls would be implemented per the SWPPP. Further, the project has been designed to avoid impacts to wetlands and/or waters of the state as per HYDRO-1. In addition, indirect effects to wetlands and/or riparian areas present along and within the project (e.g., discharge of sediment and pollutants, fugitive dust) would be minimized through implementation of APMs HYDRO-1, HAZ-1, GEN-1, and AIR-3.</p> <p>Please revise text to read:</p> <p><u>Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction.</u> Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality projection BMPs.</p>
H-120	APM BIO-2	If work is scheduled during the nesting season (January 15 through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).	<p>Standard nesting season dates are March 1st through August 15th or 31st; occasionally starting as early as February 1st. January 15th is still in winter timeframes with only select species such as golden eagles beginning to nest. As such, the January 15 nesting season restriction should only apply to golden eagles.</p> <p>Please revise text to read:</p> <p>If work is scheduled during the nesting season (<u>commencing January 15 for golden eagle and February 1 for all other birds</u> through August 31), APM BIO-2 and Mitigation Measure BIO-1 would require that nest detection surveys be implemented corresponding with the species-specific buffers set forth in PG&E's Nesting Birds: Specific Buffers for PG&E Activities (Appendix E to the PEA).</p>

	Page #	DEIR Language	Horizon West Transmission Comments
H-121	MM BIO-2	If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness.	<p>The substation site is an active vineyard with very low potential to support special-status plant species. This measure should not apply to HWT.</p> <p>Please revise text to read:</p> <p>If avoidance of special-status plants is not feasible, HWT and PG&E shall implement measures to compensate for impacts to special-status plants. Compensation may be provided by purchasing credits at a CDFW-approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species and collecting and dispersing seed of annual species (i.e., salvage and relocation) under the direction of CDFW. Where salvage and relocation is demonstrated to be feasible and biologically preferred by the CDFW, it shall be conducted pursuant to a CPUC- and CDFW-approved salvage and relocation plan that details the methods for salvage, stockpiling, and replanting, as well as the characteristics of the receiver sites. Monitoring of plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness.</p>
H-122	MM BIO-3	Operational construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible. If infeasible, HWT and PG&E shall retain a CPUC-approved biologist to conduct a nesting bird survey of the surrounding 500-foot area to determine if any active nest is present. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If operational construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.	<p>Please revise text to read:</p> <p>Operational construction or replacement work shall be avoided during the nesting bird season (January 15 to August 31) to the extent feasible. If infeasible, HWT and PG&E shall retain a CPUC-approved biologist to conduct a nesting bird survey of the surrounding 500-foot area to determine if any active nest is present. If an active nest is found, the biologist shall establish a no-disturbance nesting buffer until the nest is inactive. If operational construction activities must occur within this buffer, the biologist shall coordinate with CDFW and, as necessary, USFWS to determine buffer reductions and/or nest monitoring to avoid impacts to active nests.</p>
H-123	MM BIO-4	HWT, PG&E, and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat.	<p>The substation will not impact blue oak woodland habitat. This measure should apply to PG&E components only.</p> <p>Please revise text to read:</p> <p>HWT, PG&E and/or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on blue oak woodland habitat.</p>
H-124	MM GEO-1	HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017). These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.	<p>Please revise text to read:</p> <p>HWT, PG&E, and/or their contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the proposed Estrella Substation (RRC 2016) and proposed 70 kV power line (Kleinfelder 2017), <u>including any subsequent addendums to such reports</u>. These include recommendations for a professional geotechnical engineer or his/her representative to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, to observe and test site preparation and fill placement, and to assess the need for densification of subgrade materials.</p>

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

H-125

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Response to Comment H-1

The comment provides an overall summary of the commenter’s letter. With respect to the “Minor Project Refinement” mentioned in Comment H-1, this was viewed as a significant Project Revision by the CPUC, which necessitated recirculation of portions of the DEIR. Refer to the Recirculated DEIR, available on the CPUC project website.

(<https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/index.html>)

Additionally, subsequent data requests and responses between CPUC and Horizon West Transmission, LLC (HWT) led to the submittal by HWT of a revised version of its original DEIR comment letter, including clarifications regarding numerous aspects of the Project Revision and statements made in the original DEIR comment letter. (Refer to the response to Data Request No. 6, available here:

[https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Estrella%20HWT%20DR6%20Response%20\(05-26-21S\).pdf](https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Estrella%20HWT%20DR6%20Response%20(05-26-21S).pdf).) The original DEIR comment letter is responded to here, since it was submitted during the DEIR comment period and includes comments on portions of the DEIR other than the recirculated sections; however, the subsequent revisions and developments with respect to the Project Revision are noted throughout these responses, where applicable. The revised version of HWT’s original DEIR comment letter included in the response to Data Request No. 6 is not bracketed and responded to in this FEIR.

HWT also submitted a comment letter on the Recirculated DEIR (refer to Comment Letter R.B), which is responded to later in this chapter.

Response to Comment H-2

This comment states that Section II of the letter describes the significant of the commenter’s comments on the DEIR, which are a subset of the comments and corrections specified in the detailed comment table in Attachment 3 to the letter (refer to Comments H-55 to H-125). The comment identifies revisions to Mitigation Measure AG-1 to allow HWT and PG&E to utilize other comparable mitigation measures that would achieve conservation easements for Important Farmland as one of the most significant of HWT’s comments. The commenter’s proposed revisions to Mitigation Measure AG-1 are addressed in Responses to Comments H-15 and H-16.

Response to Comment H-3

This comment identifies proposed revisions to the DEIR text regarding conflicts between the Estrella Substation and the existing Williamson Act contract. These comments and proposed revisions to the analysis of Williamson Act contracts are addressed in Responses to Comments H-17 and H-18.

Response to Comment H-4

This comment identifies proposed revisions to Mitigation Measure NOI-1 so that it will not apply to ground-level construction noise activities. The commenter’s proposed revisions to Mitigation Measure NOI-1 are addressed in Response to Comment H-19.

Response to Comment H-5

This comment identifies requested corrections/revisions to the analysis of impacts for Alternative SS-1: Bonel Ranch Substation Site. The commenter's proposed corrections/revisions to the Alternative SS-1 analysis are addressed in Responses to Comments H-20 to H-23.

Response to Comment H-6

This comment identifies proposed revisions to the DEIR text alleging that Alternative BS-2: Battery Storage to Address Distribution Objective and Alternative BS-3: Behind-the-Meter Solar and Battery Storage are "purely speculative and have not been shown to be potentially feasible". The comments and proposed revisions regarding Alternatives BS-2 and BS-3 are addressed in Response to Comment H-24.

Response to Comment H-7

This comment identifies proposed revisions to find that Alternatives BS-2 and BS-3 do not meet the key project objective of increasing reliability. These comments and proposed revisions regarding Alternatives BS-2 and BS-3 are addressed in Responses to Comments H-25 and H-26.

Response to Comment H-8

The comment provides background information regarding the Proposed Project. The comment is noted. It does not address substantive contents of the DEIR, and no further response is necessary.

Response to Comment H-9

This comment describes aspects of the "Minor Project Refinement," as referred to by the commenter. As noted in Response to Comment H-1, the CPUC viewed this as a significant Project Revision, which resulted in the recirculation of portions of the DEIR. Refer to the Recirculated DEIR for information regarding the additional 5 acres being acquired as part of the Project Revision. The changes to the Estrella Substation parcel described in this comment and elsewhere in the comment letter were circulated for public review as part of the Recirculated DEIR and have been carried over to this FEIR (refer to FEIR, Volume 1).

Response to Comment H-10

This comment provides additional information regarding the Project Revision. This comment was revised substantially in HWT's redline version of its DEIR comment letter, included in its response to Data Request No. 6¹; refer to this document and the Recirculated DEIR for the revised language regarding the Project Revision.

Response to Comment H-11

This comment states that the Project Revision would not result in new, significant impacts or a substantial increase in the severity of a previously identified significant impact. The CPUC

¹ Available here:

[https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Estrella%20HWT%20DR6%20Response%20\(05-26-21S\).pdf](https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Estrella%20HWT%20DR6%20Response%20(05-26-21S).pdf)

reviewed the Project Revision and, as appropriate in the exercise of its independent discretion, determined it was necessary to recirculate portions of the DEIR. The Attachment 1, referenced in the comment, is identified and responded to as Comments H-28 to H-49.

Response to Comment H-12

This comment disagrees with the threshold used for determining agricultural impacts. The comment contends that the DEIR's finding that the Proposed Project's conversion of 2.66 acres of Farmland of Statewide Importance and 11.76 acres of Unique Farmland to non-agricultural uses is a significant impact suggests that "the permanent conversion of any amount of designated farmland acreage, however small, is a significant impact." The comment also alleges that the DEIR's use of such a stringent threshold negates the use of the California Agricultural Land Evaluation and Site Assessment (LESA) Model. The comment provides information on the California LESA Model from the California Department of Conservation's (CDOC) website.

The EIR recognizes that "land with the high-quality soils and characteristics necessary to produce high yields of the State's valued produce is a limited resource, and Important Farmland is under continued threat from urbanization pressures throughout California." (FEIR, Volume 1, p. 4.2-13.) CDOC submitted a comment letter during the scoping period, which can be found in Attachment A of the Scoping Report (available on the Estrella Project website <https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/index.html>), that states; "the conversion of agricultural land represents a permanent reduction and significant impact to California agricultural land resources." Furthermore, San Luis Obispo County's Agricultural Element of the General Plan gives a high priority to the protection of agricultural lands and has agricultural goal policies (AGPs) to conserve and protect agricultural lands. As shown in Appendix A in Volume 2 of the EIR, on page A-6, AGP 24 (a)(4) states:

AGP24: Conversion of Agricultural Land.

- a. Discourage the conversion of agricultural lands to non-agricultural uses through the following actions:
 4. Avoid locating new public facilities outside urban and village reserve lines unless they serve a rural function or there is no feasible alternative location within the urban and village reserve lines.

The Agricultural Element also includes the following goals:

** Where agricultural land is proposed for conversion to urban/suburban uses, give consideration to the protection of agricultural lands in the following priority order: row crop terrain and soils, specialty crops and forage lands, dry farm lands, and rangelands for grazing.

** Approve land for conversion from Agriculture to non-agriculture designations based upon a detailed site specific evaluation and consistency with the following findings: a. the land does not meet the criteria for inclusion in the Agriculture designation in this plan or the Land Use Element; and b. agricultural production is not feasible due to some physical constraint (such as soil infertility, lack of water resource, disease), or surrounding incompatible land uses; and c. adjacent lands are already substantially

developed with uses that are incompatible with agricultural uses; and d. the conversion to non-agricultural uses shall not adversely affect existing or potential agricultural production on surrounding lands that will remain designated Agriculture; and e. there is an over-riding public need for the conversion of the land that outweighs the need to protect the land for long-term agricultural use, such as the orderly expansion of an incorporated city or community.

The substation site includes the removal of existing vineyards on farmland that is considered Farmland of Statewide Importance and Unique Farmland. Therefore, a conservative threshold was chosen so that any permanent loss of farmland that is classified as Prime, Unique, or of Statewide Importance is considered significant, consistent with Appendix G of the CEQA checklist, CDOC comments, and San Luis Obispo's agricultural policies. This comment is noted, but no revisions to the DEIR text have been made².

With respect to the comment that the DEIR's threshold for determining the significance of the conversion of farmland negates the use of the California LESA Model, this comment is noted. As the commenter notes, use of the California LESA Model is an alternative approach to assessing impacts to designated farmland. Similarly, CDOC's website states that the California LESA Model is an "optional" methodology. Thus, the CPUC is not required to use this methodology in evaluating impacts to agricultural lands. As detailed in Section 4.2 of the EIR (refer to Volume 1 of this FEIR), the CPUC carefully considered the effects of the Proposed Project in light of the Appendix G significance criteria and determined that the permanent conversion/loss of 2.66 acres of Farmland of Statewide Importance and 11.70 acres of Unique Farmland³ would be significant.

Response to Comment H-13

This comment states that the threshold used for farmland conversion impacts is different than thresholds used in other projects for which the CPUC was the lead agency. The comment provides examples of thresholds used and urges the CPUC to consider whether the threshold applied in the DEIR should be adjusted in the FEIR for consistency with other projects. The CPUC has the discretion to choose a more conservative threshold when, as there, the use of that threshold is supported by substantial evidence; refer to Response to Comment H-12.

² Section 4.2, "Agriculture and Forestry Resources" of the DEIR was recirculated due to the potential increased impact of an additional 5 acres of Farmland conversion. While portions of Section 4.2 were revised and recirculated, no revisions were made in response to this comment and the significance threshold/approach from the original DEIR section's analysis were retained. Similarly, no revisions have been made in this FEIR to change the significance threshold used for the agricultural resources impact analysis.

³ These impact acreages were revised in the Recirculated DEIR due to the larger substation parcel and reoriented substation design/layout. Refer to the revised Section 4.2, "Agriculture and Forestry Resources" in the Recirculated DEIR. Section 4.2 in Volume 1 of the FEIR also incorporates the updated impact acreages.

Response to Comment H-14

This comment states that the DEIR's standard of deeming significant any loss of farmland fails to consider additional factors, such as the overall acreage subject to conversion, the value of the farmland to be converted, or the relative percentage of Prime and other farmland to be converted compared to the overall acreage in the county. This comment is noted and will be shared with the CPUC's decisionmakers. Please refer to Responses to Comments H-12 and H-13.

Response to Comment H-15

This comment requests that Mitigation Measure AG-1 be revised to allow HWT and PG&E the flexibility to pursue/utilize other conservation easement arrangements and to recognize that HWT and PG&E will have different contribution amounts. The CPUC notes the commenter's concerns and agrees that revisions to Mitigation Measure AG-1 are warranted, based on the commenter's suggestions. The revisions are further discussed and shown in the following comment response (H-16).

Response to Comment H-16

This comment provides proposed language for the revised Mitigation Measure AG-1. These proposed revisions have been accepted with some modifications (and based on other comments received on the EIR, including J-122 and D-60) and have been incorporated into the FEIR⁴. Mitigation Measure AG-1 has been revised as follows:

Mitigation Measure AG-1: Provide Compensation for Loss of Agricultural Land.

To compensate for the loss of Farmland of Statewide Importance and Unique Farmland, HWT and PG&E shall, prior to the completion construction of the Proposed Project or alternative, construction, shall either:

- 1) eContribute sufficient funds, in an amount equal to the fair market value, based upon value prior to beginning of project construction, of the impacted Farmland of Statewide Importance and Unique Farmland, as it applies to each Applicant's specific impacts (i.e., adequate to support the conservation ratio described below) to the California Farmland Conservancy Program¹, to compensate for the loss of Farmland of Statewide Importance and Unique Farmland that would occur from the Proposed Project or alternatives, or to another public agency or non-profit organization which will achieve similar long-term preservation of agricultural lands in San Luis Obispo County;
- 2) Enter into and record one or more conservation easements with landowners for land classified as the same or greater FMMP Important Farmland category

⁴ These revisions were not made in the revised Section 4.2, "Agriculture and Forestry Resources," as part of the recirculation. This was because these revisions were not directly related to the reasoning for recirculating this section, which was based on the increased impact acreage from the substation. However, the revisions have been incorporated into the FEIR, as shown here and in Chapter 4, *Revisions to the DEIR*, as well as in Volume 1.

as the land impacted and is under vineyard production at a 1:1 ratio by acreage for the impacted Farmland of Statewide Importance and Unique Farmland; or

- 3) A combination of clauses 1 and 2, above, may be implemented via a financial contribution equaling the fair market value, consistent with clause 1, or any land acreage not considered via a conservation easement in a 1:1 ratio by acreage, consistent with clause 2.

Each Applicant may implement this mitigation measure independently or jointly for the acreage of their respective impacts. Any fair market value estimates, proposed recipients of financial contributions, and proposed conservation easements shall be submitted to the CPUC for review and approval prior to funding and/or execution to assure fulfillment of the intent of this mitigation measure.

~~The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California through the use of agricultural conservation easements. The amount of HWT's and PG&E's contribution shall ensure the conservation of one acre of agricultural land in San Luis Obispo County for each acre of agricultural land converted by with the Proposed Project or alternatives, based on the market price for the commensurate agricultural land at the time that the impacts occur.~~

Footnote 1: The California Farmland Conservancy Program is established under PRC Sections 10200-10277 to promote the long-term preservation of agricultural lands in California through the use of agricultural conservation easements.

This revised text is also provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR. The revisions to Mitigation Measure AG-1 have also been carried over to the Mitigation Monitoring and Reporting Program (MMRP), which is Appendix F in Volume 2 of the FEIR.

Response to Comment H-17

The comment expresses concern that the DEIR incorrectly concludes that the Proposed Project would result in a significant and unavoidable conflict with Williamson Act contracts. The comment states that the removal of 15 acres of land⁵ from a Williamson Act parcel for construction of the Estrella Substation would not create a conflict because Government Code section 51238 allows electrical facilities as compatible uses and also because the remaining 78⁶

⁵ Note that based on the Project Revision included in HWT's DEIR comment letter, the impacts on agricultural land related to Williamson Act contract parcels have increased. As described in the Recirculated DEIR, the substation parcel has increased to 20 acres, all of which will be removed from the existing Williamson Act contract. This response addresses the original DEIR comment letter as written; however, the reader is advised that the impacts have increased since submittal of this original letter.

⁶ This comment appears to assume 20 acres would be removed from the existing 98-acre Williamson Act parcel, consistent with the commenter's proposed Project Revision (see Response to Comment H-1). However, the original DEIR only contemplated that 15 acres would be removed, leaving the remaining acreage at 83 acres.

acres of the existing Williamson Act parcel would be eligible for a modified Williamson Act contract.

The original DEIR section's conclusion that the Proposed Project would result in significant and unavoidable impacts to agriculture did not require a finding that a Williamson Act contract be subject to cancellation. Rather, the DEIR found that the removal of 15 acres of land (since increased to 20 acres) from an existing Williamson Act contract, even if the remaining land remains under a Williamson Act contract, is a significant impact because the intent of the Williamson Act is to preserve agricultural land. The DEIR acknowledged that electric facilities are compatible uses on lands under Williamson Act contracts, in accordance with Government Code section 51238. In addition, the DEIR acknowledged that the remaining acreage of the existing Williamson Act parcel would still be eligible for a modified Williamson Act contract. However, as the commenter acknowledges, the size of the Williamson Act contract parcel will be substantially reduced following implementation of the Proposed Project, leaving less land to be protected.

The EIR concludes that because there is no feasible mitigation to create new and equivalent farmland to replace the Williamson Act contract land, which would be lost, the impact would be significant and unavoidable. This approach is appropriate and not contrary to law; thus, no changes to this significance determination have been made in the FEIR.

Response to Comment H-18

The comment suggests modifications to the EIR's findings regarding Proposed Project conflicts with the Williamson Act. Please refer to Response to Comment H-17. The proposed revisions to the DEIR text included in this comment have not been made in the FEIR.

Response to Comment H-19

The comment suggests revisions to Mitigation Measure NOI-1 so that it would not apply to ground-level construction activities. The comment argues that the EIR found that ground-level construction noise would not be significant, citing one sentence from the "Noise and Vibration" section of the EIR; therefore, the commenter argues, Mitigation Measure NOI should not apply to ground-level construction activities. As detailed in the discussion under Impact NOI-1 in Section 4.13, "Noise and Vibration," in Volume 1 of the FEIR, there would be elevated levels of noise for people within 40 feet of ground-level construction, which would be significant, and, therefore, Mitigation Measure NOI-1 is still applicable. Designating procedures as mitigation measures ensures that activities are well-tracked and compliance is enforced through the Mitigation Monitoring and Reporting Program (MMRP). For Mitigation Measure NOI-1, this is mainly done by requiring noticing of construction activities, methods for dealing with and responding to noise complaints, time of day restrictions, equipment maintenance, shrouding equipment, and limiting idling.

Although Mitigation Measure NOI-1 has not been revised as requested by the commenter, the text in Section 4.13, "Noise and Vibration," page 4.13-18, in Volume 1 of the FEIR, has been revised to clarify the nature of the ground-level construction noise impacts. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also shown below.

Nevertheless, with implementation of APMs and Mitigation Measure NOI-1, which would expand requirements from the APMs, the ground-level construction noise from the Proposed Project would not be significant given: (1) the limited number of noise-sensitive receptors in proximity to much of the Proposed Project; (2) the relatively rapid attenuation of even the loudest pieces of construction equipment with distance from the source, and (3) the impacts would be temporary and occur over a relatively short duration at individual structure locations or segments of the 70 kV power line alignment (as opposed to work occurring along the entire alignment simultaneously).

...

Conclusion

Overall, the ground-level construction noise impacts would be less than significant with mitigation ~~are not expected to be significant~~.

Additionally, the text of Mitigation Measure NOI-1, on page 4.13-19 in Volume 1 of the FEIR, has been revised to clarify that the ground-level noise mitigation measures would only apply to construction activities associated with the 70 kV power line. As such, the measure would not apply to HWT. The revised text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is shown below. The revisions to Mitigation Measure NOI-1 have also been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Mitigation Measure NOI-1: General Construction Noise.

~~HWT and~~ PG&E shall implement the following procedures for ~~all~~ construction activities associated with the 70 kV power line:

Response to Comment H-20

The comment states that the commenter agrees with the DEIR that the Estrella Substation (included in Alternative Combination #2) is the environmentally superior alternative as compared with other alternatives for the substation site. The comment is noted and will be shared with the CPUC's decisionmakers.

Response to Comment H-21

The comment states generally that the DEIR ignores or understates certain impacts associated with the alternative substation site labeled as Alternative SS-1: Bonel Ranch Substation Site. Please refer to Responses to Comments H-22 to H-23.

Response to Comment H-22

The comment alleges that the EIR fails to recognize the significant visual effects of siting the substation at the Bonel Ranch Substation Site and that the EIR incorrectly concludes that the alternative would have a less severe effect on the area's visual character and visual quality compared to the Proposed Project due to the area's lower "viewer concern" and "viewer exposure" ratings. The comment claims that the analysis fails to consider potential changes to the visual character and visual quality of the Bonel Ranch Substation Site that would result if the substation were located there, including visual incompatibility with the surrounding landscape

as seen from Estrella Road. Lastly, the comment notes that construction of Alternative PLR-1C (or minor route variation) could result in additional visual impacts, but the EIR does not describe these potentially significant impacts.

The comment correctly notes that the substation would substantially degrade the Bonel Ranch Substation Site's visual character, which is dominated by agrarian uses. The comment also correctly notes that viewer concern and viewer exposure should not be factored in when concluding Alternative SS-1's effects on visual character and visual quality. For clarification, the DEIR should have concluded that the overall visual effects of Alternative SS-1 would be less severe than the Proposed Project because viewer concern and viewer exposure are lower than those for the Proposed Project (as described in Table 4.1-1) primarily due to the fewer motorists that travel along Estrella Road in comparison to Union Road. In response to this comment, the discussion in Section 4.1, "Aesthetics," on pages 4.1-47 to 4.1-48, in Volume 1 of the FEIR has been revised to clarify the Bonel Ranch Substation's effects on visual character and visual quality. The revised text is shown below, as well as in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Development of the substation at the Bonel Ranch site would substantially alter the visual character and quality of public views of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities. Development of the substation at this site would be visually incompatible with the surrounding agrarian landscape and therefore would have a significant effect on the area's visual character and visual quality. Construction activities would also result in temporary adverse effects on public views in the area. However, because viewer concern and exposure is lower in this area (refer to Table 4.1-1; KOPs 11 and 12), overall, this alternative would have a less severe ~~effect on the area's visual character and visual quality~~ visual effect when compared to the Proposed Project. Implementation of **Mitigation Measure AES-1** would help reduce the visual impact of Alternative SS-1 to a less-than-significant level. As a result, impacts under significance criterion C would be **less than significant with mitigation.**

These revisions do not result in a change to the overall impact conclusion for Alternative SS-1. The visual impacts associated with Alternative PLR-1C are described on pages 4.1-49 to 4.1-50 in Volume 1 of the FEIR.

Response to Comment H-23

This comment states that the DEIR fails to identify potentially significant agricultural impacts from the Bonel Ranch Substation Site due to cancellation of a Williamson Act contract. The comment notes that, according to the San Luis Obispo County Land Use View GIS mapper, the Bonel Ranch Substation Site parcel is under an existing Williamson Act contract; thus, based on the logic applied to the proposed Estrella Substation, the impacts related to Williamson Act contracts should be significant for Alternative SS-1.

This comment was taken into account for the Recirculated DEIR and the Williamson Act contract status of the Bonel Ranch Substation Site parcel was corrected in the revised Section 4.2, "Agriculture and Forestry Resources." The significance conclusion under criterion b (conflicts with lands under Williamson Act contract) for Alternative SS-1 also was changed to significant and unavoidable in the revised section, consistent with the approach used for the Proposed

Project. The revisions from the Recirculated DEIR have been accepted in this FEIR (i.e., not shown in underline/strikeout in Volume 1); therefore, the comment has been addressed.

Response to Comment H-24

This comment states that Alternatives BS-2 and BS-3 are purely speculative and have not been shown to be potentially feasible; thus, the alternatives should be eliminated. For the CPUC's response to Comment H-24, please refer to Master Response 5.

Response to Comment H-25

This comment states that Alternatives BS-2 and BS-3 should be eliminated because they do not meet the Proposed Project's objective to ensure transmission and distribution reliability. The comment summarizes the background and need for the Proposed Project, including the California Independent System Operator (CAISO) Functional Specifications. The comment provides the project objectives from the PEA and provides a statement from CAISO based on updated studies it performed for the Proposed Project. Finally, the comment describes and lists the Proposed Project objectives developed by the CPUC for the EIR. The comment is noted and will be shared with the CPUC's decisionmakers. Please refer to Response to Comment H-26 for additional information.

Response to Comment H-26

This comment states that Alternatives BS-2 and BS-3 should be eliminated, claiming that "the DEIR partly recognizes the reliability need, but fails to fully capture the nature of the reliability need..." In particular, the comment alleges that the DEIR fails to recognize the need to increase service reliability at the distribution level. The comment claims the alternatives should be removed from further consideration because battery energy storage systems (BESSs) cannot solve the issue of long feeders and poor service reliability.

The CPUC notes these concerns; however, the CPUC, as Lead Agency, is required to independently evaluate a project and independently develop objectives for the purposes of the CEQA analysis. The CPUC maintains that its project objectives, as identified in Comment H-25 and Chapter 2, *Project Description*, of Volume 1 of the FEIR, are appropriate and capture the fundamental drivers/objectives of the Proposed Project. The information in Comment H-25 largely identify the focus of the Proposed Project as in correcting identified transmission system reliability constraints. The CAISO functional specifications, as quoted by the commenter in Comment H-25, focus on the 70 and 230 kV system vulnerabilities in the event of the loss of components (i.e., Category B and C3 contingencies). Nowhere is the issue of long feeders and distribution service reliability mentioned in the CAISO functional specifications.

Additionally, while the CPUC considers the Distribution Objective to be one of the two primary objectives of the Proposed Project, as explained in Master Response 5, the distribution need became less urgent during the course of the CEQA analysis. Particularly in light of the COVID-19 pandemic, the uncertainty regarding near- and long-term load growth in the Paso Robles DPA remains and is substantial. While the CPUC acknowledges the identified distribution service reliability issues due to long feeders, it does not consider this existing condition to be a primary driver of the Proposed Project.

Given that Alternative BS-1 was eliminated from further consideration in the Final ASR (refer to Appendix B in Volume 2 of this FEIR), any alternative combination would need to include a substation and powerline to meet the Transmission Objective. The CPUC reasonably concludes, as explained in the ASR (refer to Appendix B in Volume 2 of this FEIR), that Alternatives BS-2 and BS-3 could be included in such an alternative combination to also meet the Distribution Objective. Even if another consideration of addressing distribution system reliability due to long feeders was added, per CEQA Guidelines Section 15126.6, alternatives in an EIR are required to “feasibly attain *most* of the basic objectives of the project...” [emphasis added]. As such, by addressing the transmission system constraints as well as load growth in the Paso Robles DPA (as acknowledged by the commenter), an alternative combination including Alternatives BS-2 and BS-3 would address most of the project objectives.

Response to Comment H-27

Thank you for your comment. Responses to comments raised in the attachments to your letter are provided below.

Response to Comment H-28

The CPUC notes the provision of this memorandum describing the “Minor Project Refinement,” which the CPUC considers to be a substantial change to the Proposed Project. As described in Response to Comment H-1, the change referred to as the “Minor Project Refinement” led to the recirculation of portions of the DEIR. The changes described in the referenced memorandum (and modified in HWT’s response to Data Request No. 6) were incorporated into the revised Project Description that was recirculated and have been accepted in the FEIR (refer to Chapter 2 in Volume 1 of this FEIR). Refer to the Recirculated DEIR for detailed discussion of the changes and issues described and discussed in Comment H-28 and subsequent comments.

In determining the potential impacts of the changes constituting the “Minor Project Refinement,” the CPUC considered each of the resource topics included in Appendix G of the CEQA Guidelines. As described in the Recirculated DEIR, ultimately the changes were only determined to substantially worsen one significant impact: conversion of Important Farmland. The Air Quality section was recirculated for reasons separate from the “Minor Project Refinement.”

Response to Comment H-29

Refer to Response to Comment H-28. The impacts of the “Minor Project Refinement” were evaluated independently by the CPUC, as described in the Recirculated DEIR.

Response to Comment H-30

Refer to Response to Comment H-28.

Response to Comment H-31

Refer to Response to Comment H-28.

Response to Comment H-32

Refer to Response to Comment H-28.

Response to Comment H-33

Refer to Response to Comment H-28.

Response to Comment H-34

Refer to Response to Comment H-28.

Response to Comment H-35

Refer to Response to Comment H-28.

Response to Comment H-36

Refer to Response to Comment H-28.

Response to Comment H-37

Refer to Response to Comment H-28.

Response to Comment H-38

Refer to Response to Comment H-28.

Response to Comment H-39

Refer to Response to Comment H-28.

Response to Comment H-40

Refer to Response to Comment H-28.

Response to Comment H-41

Refer to Response to Comment H-28.

Response to Comment H-42

Refer to Response to Comment H-28.

Response to Comment H-43

Refer to Response to Comment H-28.

Response to Comment H-44

Refer to Response to Comment H-28.

Response to Comment H-45

Refer to Response to Comment H-28.

Response to Comment H-46

Refer to Response to Comment H-28.

Response to Comment H-47

Refer to Response to Comment H-28.

Response to Comment H-48

Refer to Response to Comment H-28.

Response to Comment H-49

Refer to Response to Comment H-28.

Response to Comment H-50

This comment provides a figure depicting the new 20-acre substation parcel in relation to the original 15-acre parcel. This information was incorporated into the revised Project Description as part of the Recirculated DEIR. Those changes are carried over into Chapter 2, *Project Description* in Volume 1 of the FEIR.

Response to Comment H-51

This comment is a site plan of the reconfigured Estrella Substation. This information was incorporated and analyzed as part of the Recirculated DEIR. Those changes are carried over into Chapter 2, *Project Description* in Volume 1 of the FEIR.

Response to Comment H-52

The commenter prepared revised project construction emissions. Refer to Master Response 11. No revisions have been made.

Response to Comment H-53

The commenter prepared revised project construction emissions. Refer to Master Response 11. No revisions have been made.

Response to Comment H-54

This comment provides a revised version of the Project Description from the DEIR, including revisions to reflect the larger substation parcel and reconfigured substation facilities. Note that HWT provided a “track changes” version of this revised Project Description in its response to CPUC Data Request No. 6. The changes reflected in this revised Project Description were incorporated into the Recirculated DEIR. These changes are carried over into Chapter 2, *Project Description* of Volume 1 of this FEIR.

Response to Comment H-55

This comment revises the maximum elevation of the project vicinity. This change was reflected in the revised Project Description as part of the Recirculated DEIR and has been carried over to the Project Description and Executive Summary in Volume 1 of this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, and page ES-2 in Volume 1 of the FEIR.

Response to Comment H-56

This comment revises the size of the substation parcel. This change was reflected in the revised Project Description as part of the Recirculated DEIR and has been carried over to the Project Description and Executive Summary in Volume 1 of this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, and page ES-4 in Volume 1 of the FEIR.

Response to Comment H-57

This comment revises the description of electrical equipment at the 230 kV substation. In response to Comment H-57, the text in the Executive Summary, page ES-4 in Volume 1 of the FEIR, has been revised. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-58

This comment provides additional information regarding ultimate buildout of the Estrella Substation. In response to Comment H-58, the text in the Executive Summary, page ES-5 in Volume 1 of the FEIR, has been revised. For revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-59

This comment revises the amount of cut and fill to be anticipated as part of earthwork activities for construction of the substation. Note that this comment was revised as part of HWT's response to CPUC's Data Request No. 6. The revised language included in the response to Data Request No. 6 was reflected in the revised Project Description as part of the Recirculated DEIR and has been carried over to the Project Description and Executive Summary in Volume 1 of this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, and page ES-6 in Volume 1 of the FEIR.

Response to Comment H-60

This comment corrects the citation for the basic purposes of CEQA. In response to Comment H-60, the text in Chapter 1, *Introduction* has been revised. (FEIR, Volume 1, p. 1-1.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-61

This comment corrects the relative position of the 500 kV transmission line depicted on Figure 2-1. This change has been incorporated into a revised version of Figure 2-1, shown in Chapter 2, *Project Description* in Volume 1 of the FEIR. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-62

This comment revises the maximum elevation of the project vicinity. This is the same change described in Comment H-55. As described in Response to Comment H-55, this change was reflected in the revised Project Description as part of the Recirculated DEIR and has been carried over into this FEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-63

This comment is an exact duplicate of Comment H-62 and appears to be a typographical error by the commenter. Refer to the Response to Comment H-62.

Response to Comment H-64

This comment revises the size of the substation site and parcel. This change was reflected in the revised Project Description as part of the Recirculated DEIR and has been carried over into this FEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-65

This comment corrects the relative position of the 500 kV transmission line depicted in Figure 2-4. This change has been incorporated into a revised version of Figure 2-4, shown in Chapter 2, *Project Description*, in Volume 1 of this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-66

This comment changes the amount of permanent ground disturbance at the Estrella Substation parcel from 15 acres to 20 acres. This comment was struck as part of HWT's response to CPUC's Data Request No. 6⁷. Although the substation parcel was increased to 20 acres, this additional acreage would not necessarily be disturbed. Refer to the Recirculated DEIR for discussion. As a result, no further response is required for this comment and the requested change has not been made in the FEIR.

Response to Comment H-67

This comment revises the size of the substation site/parcel. This change was reflected in the revised Project Description as part of the Recirculated DEIR and has been carried over into this FEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-68

This comment corrects the extent of paving of the access road. This change was reflected in the revised Project Description as part of the Recirculated DEIR and has been carried over into this FEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

⁷ Available here:

[https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Estrella%20HWT%20DR6%20Response%20\(05-26-21S\).pdf](https://ia.cpuc.ca.gov/environment/info/horizonh2o/estrella/docs/Estrella%20HWT%20DR6%20Response%20(05-26-21S).pdf)

Response to Comment H-69

This comment requests that Figure 2-7 be updated to include the new substation parcel (which is larger) and to update the temporary and permanent disturbance areas. Figure 2-7 was updated to reflect these changes as part of the Recirculated DEIR and the updated figure has been carried over into this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-70

This comment requests that Figure 2-11 be replaced with the new substation layout. Figure 2-11 was replaced as part of the Recirculated DEIR and the new figure has been carried over into this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-71

This comment requests that Figure 2-12 be replaced with the new substation layout. Figure 2-12 was replaced as part of the Recirculated DEIR and the new figure has been carried over into this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-72

This comment requests that Figure 2-13 be replaced with the new substation layout. Figure 2-13 was replaced as part of the Recirculated DEIR and the new figure has been carried over into this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-73

This comment modifies the description of fencing at the 230 kV substation. Note that this comment was subsequently discussed in a meeting between HWT, PG&E, and CPUC. During this meeting, HWT and PG&E clarified that 12 feet would be a reasonable maximum (i.e., worst-case scenario) height for the substation fence. Thus, this language was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-74

This comment does not include any tracked revisions and no differences between the existing and revised text are apparent. Thus, no changes to the DEIR text are warranted in response to this comment.

Response to Comment H-75

Similar to Comment H-74, this comment does not include any tracked revisions and there appear to be no differences between the existing DEIR language and the revised text proposed by HWT. Therefore, no changes to the DEIR text are warranted in response to this comment.

Response to Comment H-76

This comment requests that Figure 2-18 be replaced with the new substation layout. Figure 2-18 was replaced as part of the Recirculated DEIR and the new figure has been carried over into this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-77

This comment revises the size of the substation parcel from 15 acres to 20 acres. This comment was also revised as part of HWT's response to CPUC's Data Request No. 6. The language from Data Request No. 6 was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-78

This comment revises the amount of cut and fill to be anticipated as part of earthwork activities for construction of the substation. Note that this comment was revised as part of HWT's response to CPUC's Data Request No. 6. The revised language from the response to Data Request No. 6 was reflected in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-79

This comment revises the minimum and maximum depths of excavation for access road construction. This change was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-80

This comment revises the total area of construction disturbance at the Estrella Substation for vegetation removal and grading. This comment was subsequently revised as part of HWT's response to CPUC's Data Request No. 6. The revised language from the response to Data Request No. 6 was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-81

This comment provides clarifying information regarding the Estrella Substation staging areas. This comment was subsequently revised as part of HWT's response to CPUC's Data Request No. 6 (to strike the changes regarding the size of the substation permanent disturbance area/site). The revised language from the response to Data Request No. 6 was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-82

This comment revises the length of the main access road. This change was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already

circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-83

This comment indicates that water trucks may be operated on Sundays. This change was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-84

This comment states that Caltrans Transportation Permits may be required for transporting some oversize/overweight equipment; thus, Caltrans Transportation Permits should be added to Table 2-11. This change was included in the revised Project Description as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-85

This comment revises the amount of mineral oil that would be used for the transformers within the substation under Alternative SS-1. In response to Comment H-85, the text in Chapter 3, *Alternatives Description*, has been revised. (FEIR, Volume 1, p. 3-4.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-86

This comment revises the amount of mineral oil that would be used for the transformers within the substation under Alternative SE-1A. In response to Comment H-86, the text in Chapter 3, *Alternatives Description*, has been revised. (FEIR, Volume 1, p. 3-93.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-87

This comment revises the size of the parcel/site to be acquired by HWT; the substation would occupy 15 acres of a 20-acre site. In response to Comment H-87, the text in Section 4.1, "Aesthetics," has been revised. (FEIR, Volume 1, p. 4.1-3.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-88

This comment revises the size of the substation parcel to be acquired by HWT. In response to Comment H-88, the text in Section 4.1, "Aesthetics," has been revised. (FEIR, Volume 1, p. 4.1-40.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-89

The comment expresses concern that the EIR's analysis of Alternative SS-1's (Bonel Ranch Substation Site's) effects on visual character is inadequate and undervalues the visual sensitivity

of this scenic area, neglecting consideration of the substantial degree to which this substation would contrast with the surrounding landscape. Note that the CPUC modified the analysis of Alternative SS-1's effects related to aesthetics in response to Comment H-22. With the modified language, the EIR does conclude that "Development of the substation at the Bonel Ranch site would substantially alter the visual character and quality of public views of this immediate area and its agricultural setting due to the large scale and industrial nature of the substation facilities." (FEIR, Volume 1, p. 4.1-47.) While the visual quality of this alternative site is considered moderate-to-high (as described in Table 4.1-2 for KOPs 11 and 12), the area has lower visual sensitivity relative to the Estrella Substation site due to the comparatively low number of viewers in the area. The EIR found that with implementation of Mitigation Measure AES-1, impacts would be reduced to less-than-significant levels. The comment does not present substantial evidence that the DEIR failed to disclose a potentially significant impact resulting from Alternative SS-1.

Response to Comment H-90

This comment notes that daily traffic is greater along El Pomar Drive than along Union Road adjacent to the proposed substation and, therefore, the comment asserts that viewer exposure would be greater under Alternative SE-1A. The comment further notes that the 230 kV interconnection line under Alternative SE-1A would be longer than the interconnection line for the Estrella Substation. In addition, the comment notes that the expanded substation under Alternative SE-1A would be constructed on undeveloped land and would require removal of oak trees and other vegetation. As such, the comment argues that the visual dominance of the substation under Alternative SE-1A would increase and the visual impacts would be similar to the Estrella Substation. For these reasons, the comment requests that the EIR be revised to acknowledge that Alternative SE-1A would result in similar adverse effects on the visual character and quality relative to the Proposed Project.

The EIR concluded that Alternative SE-1A would have a less severe adverse effect on visual character and visual quality in comparison to the Proposed Project because the existing substation site has lower visual quality that is dominated by existing transmission towers, electrical lines, and supporting structures. The CPUC acknowledges that average daily traffic appears to be higher on El Pomar Drive in the vicinity of Alternative SE-1A, as compared to Union Road near the Estrella Substation site, based on the data provided by the Proposed Project Applicants in their response to CPUC's Data Request No. 4. The comment also correctly notes that the 230 kV interconnection line would be 500 feet longer than the interconnection line for the Estrella Substation, and that the expanded substation under Alternative SE-1A would involve removal of oak trees which provide aesthetic value. On balance, the effects on visual character and visual quality would be less than the Proposed Project as the substation site under Alternative SE-1A has lower visual quality due to the presence of an existing substation and other electrical infrastructure.

In response to Comment H-90, the text in Section 4.1, "Aesthetics," page 4.1-52, in Volume 1 of the FEIR, has been revised to describe the longer interconnection line and removal of oak trees at the substation site and that the effects of introducing a substation at this site would be similar to the Proposed Project. The revised text is shown below and in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Alternative SE-1A would add additional electrical infrastructure where no development currently exists on the site including a 500-foot longer interconnection line than the Proposed Project and would require removal of oak trees and vegetation. The new substation and associated electrical infrastructure ~~and~~ would be noticeable to motorists along El Pomar Drive (e.g., from KOPs 18 and 19) and likely visible from the residence near KOP 20. Construction activities would also result in temporary adverse effects on public views in the area. Even in light of the oak tree removal work and longer interconnection line associated with Alternative SE-1A, ~~this~~ alternative site would result in less adverse effects on visual character and visual quality than the Proposed Project because the new substation would be sited adjacent to an existing substation and the area is characterized by electrical infrastructure.

Response to Comment H-91

This comment alleges that the analysis for Alternative SE-1A under criterion b (which pertains to effects on visual character and visual quality) does not identify that impacts would be significant. The comment appears to accidentally propose revisions to text on page 4.1-50 of the DEIR instead of page 4.1-46.

This comment raises similar concerns described in Comment H-22; please refer to Response to Comment H-22. In response to this comment and Comment H-22, the text in Section 4.1, “Aesthetics,” page 4.1-47 in Volume 1 of the FEIR, has been revised to include additional discussion regarding the Bonel Ranch Substation’s effects on visual character and visual quality and how those impacts would be significant.

Response to Comment H-92

This comment proposes changes to the calculated acreage of impacts to Important Farmland based on the changes to the size of the substation site/parcel. This comment was struck by HWT in its response to CPUC’s Data Request No. 6. Therefore, no further response is required here and the originally requested changes have not been made in the FEIR.

Response to Comment H-93

This comment proposes changes to the calculated acreage of impacts to Important Farmland based on the changes to the size of the substation site/parcel. This comment was struck by HWT in its response to CPUC’s Data Request No. 6. Therefore, no further response is required here and the originally requested changes have not been made in the FEIR.

Response to Comment H-94

This comment proposes changes to the calculated acreage of impacts to Important Farmland based on the changes to the size of the substation site/parcel. This comment was struck by HWT in its response to CPUC’s Data Request No. 6. Therefore, no further response is required here and the originally requested changes have not been made in the FEIR.

Response to Comment H-95

This comment revises the size of the substation parcel (from 15 acres to 20 acres). This passage was revised to reflect the larger substation parcel in the revised Agriculture and Forestry Resources section as part of the Recirculated DEIR. Since this change was already circulated for

public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-96

This comment revises the size of the of substation parcel (from 15 acres to 20 acres). This passage was revised to reflect the larger substation parcel in the revised Agriculture and Forestry Resources section as part of the Recirculated DEIR. Since this change was already circulated for public review as part of the recirculation, it is not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-97

This comment repeats the commenter’s contention that the impacts associated with conflicts with Williamson Act contracts were not evaluated properly in the DEIR. The proposed revised text, originally presented in Comment H-18, is presented again in this comment. Refer to Responses to Comments H-17 and H-18. As explained in Responses to Comments H-17 and H-18, the proposed revisions are unnecessary and have not been made in the FEIR.

Response to Comment H-98

This comment states that the Alternative SS-1 (Bonel Ranch Substation Site) is under a Williamson Act contract, according to the San Luis Obispo County Land Use View GIS mapper. Thus, the analysis should be revised to say that placing a substation on this site would conflict with a Williamson Act contract to the same extent as the Proposed Project. The GIS information described in Comment H-98 was confirmed by the CPUC and the information was included in the revised Agriculture and Forestry Resources section as part of the Recirculated DEIR. Figure 4.2-2 was updated to reflect the updated GIS Williamson Act data and the significance conclusion under criterion B for Alternative SS-1 was changed to significant and unavoidable. Since these changes were already circulated for public review as part of the recirculation, they are not shown in underline/strikeout in this FEIR. Refer to Chapter 4, *Revisions to the DEIR*, for additional explanation.

Response to Comment H-99

The commenter states that emissions following implementation of APM AIR-1 through APM AIR-3 and Mitigation Measure AIR-1 were not estimated in the DEIR and mitigated emissions should be estimated to support the finding of emissions remaining significant and unavoidable.

In response to concerns regarding construction emissions, refer to Master Response 11. In response to concerns regarding air quality mitigation measures, refer to Master Response 13.

Response to Comment H-100

This comment provides the applicable citation to the California Fish and Game Code. In response to Comment H-100, the text in Section 4.4, “Biological Resources,” page 4.4-9, in Volume 1 of the FEIR, has been revised. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-101

The comment states that it would be impracticable to perform preconstruction surveys for Crotch's bumblebee due to the abundance of rodent burrow systems within the project footprint and absence of protocol survey guidance for this species. Additionally, the comment states that any direct impacts to the species cannot be adequately concluded due to lack of information regarding the species' occurrence within the project footprint, and that there is not a legal requirement of California Endangered Species Act (CESA) that requires an applicant to notify and coordinate with CDFW if a candidate or listed species is identified during preconstruction surveys.

The CPUC disagrees with the majority of the proposed revisions in this comment. The lack of protocol survey guidance for identification of nest colonies does not mean that preconstruction surveys cannot be performed for this species. Therefore, the CPUC rejects the proposed revisions to indicate that preconstruction surveys would not be performed for Crotch's bumble bee. However, the revisions regarding following all provisions of CESA in regard to California candidate or listed species (in lieu of a requirement to necessarily notify and coordinate with CDFW) are amenable. These revisions have been made in Section 4.4, "Biological Resources," page 4.4-45, in Volume 1 of the FEIR. The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is also shown below.

Pre-construction surveys required under APM BIO-1 and Mitigation Measure BIO-1 would identify Crotch's bumble bee individuals or nests that could be present within the Proposed Project footprint. Additionally, implementation of APMs BIO-3 and GEN-1 would further reduce potential for any impacts to Crotch's bumble bee during construction. As a State candidate endangered species, the Applicants would be required to follow all provisions of CESA in regard to California candidate or listed species ~~notify and coordinate with CDFW regarding any Crotch's bumble bee nests or individuals~~ identified during pre-construction surveys or during the course of construction activities.

For clarity regarding the requirements for surveying for Crotch's bumble bee, which should be conducted during the flying season, CPUC has also added text to Mitigation Measure BIO-1, on page 4.4-49, in Section 4.4, "Biological Resources." The additional text is provided in Chapter 4, *Revisions to the DEIR*, and in Volume 1 of the FEIR, and is also shown below. The revisions to Mitigation Measure BIO-1 have been carried over to Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Pre-construction surveys for Crotch's bumble bee shall be conducted during the flying season. The results of the pre-construction surveys shall be documented by the approved biologist in a pre-construction survey report.

Response to Comment H-102

This comment suggests that the EIR text be revised to indicate that impacts on breeding and nesting birds *may* be significant. CPUC disagrees with this proposed change, as the impacts described to breeding and nesting birds, without implementation of preventative measures, would be significant. Therefore, the change has not been made in the FEIR.

Response to Comment H-103

This comment corrects an error related to the applicability of General Order (G.O.) 95 to seismic design requirements. In response to this comment, the text in Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” has been revised and the proposed revisions included in Comment H-103 have been incorporated. (FEIR, Volume 1, p. 4.7-35.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-104

This comment revises the size of the Estrella Substation parcel (from 15 acres to 20 acres). In response to Comment H-104, the text in Section 4.9, “Hazards and Hazardous Materials,” has been revised. (FEIR, Volume 1, p. 4.9-7.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-105

This comment revises the size of the Estrella Substation parcel (from 15 acres to 20 acres). In response to Comment H-105, the text in Section 4.11, “Land Use and Planning,” has been revised. (FEIR, Volume 1, p. 4.11-2.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-106

This comment suggests revisions to the analysis within the Public Services section of the EIR related to the impact statement regarding schools. The comment states that because the project would not require the relocation of non-local construction workers given the limited nature of construction activities, the significance determination related to schools should be changed to no impact. The CPUC maintains that the less-than-significant impact determination is appropriate given the potential for minor population growth associated with the Proposed Project. Therefore, no changes have been made to the EIR text in response to this comment.

Response to Comment H-107

This comment provides a clarification regarding the impact statement for Alternative SS-1 in the Transportation section of the EIR. In response to this comment, the text in Section 4.17, “Transportation,” has been revised to clarify that, although the number and frequency of construction vehicle trips for Alternative SS-1 is estimated to be the same as for the Proposed Project, the effects of construction related to transportation impacts would last longer due to the longer construction schedule for Alternative SS-1. (FEIR, Volume 1, p. 4.17-23.) For the revised text, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-108

This comment provides a clarification regarding the impact statement for Alternative SE-1A in the Transportation section of the EIR. In response to this comment, Section 4.17, “Transportation,” has been revised to clarify that, although the number and frequency of construction vehicle trips for Alternative SE-1A is estimated to be the same as for the Proposed Project, the effects on transportation would last longer due to the longer construction schedule

for Alternative SE-1A. (FEIR, Volume 1, p. 4.17-23.) For the revised text, refer to Chapter 4, *Revisions to the DEIR* and Volume 1 of the FEIR.

Response to Comment H-109

This comment revises the size of the substation parcel to be acquired by HWT (from 15 acres to 20 acres). In response to Comment H-109, the text in Section 4.20, “Wildfire,” has been revised. (FEIR, Volume 1, p. 4.20-6.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-110

This comment does not provide any tracked revisions and there appear to be no differences between the DEIR language and HWT’s proposed language. The comment appears to be a mistake. Therefore, no further response is required and no changes to the DEIR text have been made.

Response to Comment H-111

This comment corrects the text to indicate that the Bonel Ranch site is currently under a Williamson Act contract. The Williamson Act contract status of the Bonel Ranch site (Alternative SS-1) was updated in Section 4.2, “Agriculture and Forestry Resources” in the Recirculated DEIR. In response to Comment H-111, the text in Chapter 5, *Alternatives Analysis Summary and Comparison of Alternatives*, has been revised. (FEIR, Volume 1, p. 5-11.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-112

This comment requests clarification in a passage of text on DEIR page 6-13 that aesthetic impacts of some other alternatives would require mitigation to reduce them to a less-than-significant level. The intent of this passage was to refer to those alternatives (i.e., Alternatives SS-1, PLR-1A, PLR-1C, PLR-3, and SE-1A) that were found to have aesthetic impacts that were either less than significant on their own merits or with mitigation incorporated. This passage, in Chapter 6, *Other Statutory Considerations and Cumulative Impacts*, has been revised for clarity in the FEIR. (FEIR, Volume 1, p. 6-13.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-113

This comment notes that the Bonel Ranch (Alternative SS-1) site is under a Williamson Act contract. This correction was made in the revised Section 4.2, “Agriculture and Forestry Resources” as part of the recirculation. The text in Chapter 6, *Other Statutory Considerations and Cumulative Impacts*, has been modified to clarify the nature of the impacts to agricultural resources at the project level. (FEIR, Volume 1, p. 6-21.) . The revised text is provided in Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR, and is shown below.

None of the other alternatives, nor the reasonably foreseeable distribution components, would ~~significantly~~ substantially affect ~~agricultural~~ sensitive farmland resources at the project level.

Response to Comment H-114

This comment notes that the 230 kV yard at the Estrella site would be most visible to motorists along the site's southeastern perimeter fronting Union Road and recommends revisions to Mitigation Measure AES-1 to limit the installation of chain link fence slats to this portion of the substation's perimeter. The CPUC concurs with the proposed revisions. The text of Mitigation Measure AES-1 in Appendix F, *Mitigation Monitoring and Reporting Program*, has been revised. (FEIR, Volume 2, p. F-9.) For the revised text, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR. The revisions to Mitigation Measure AES-1 have also been carried over to Section 4.1, "Aesthetics," in Volume 1 of the FEIR.

Response to Comment H-115

This comment restates the commenter's request that Mitigation Measure AG-1 be revised to allow HWT and PG&E to utilize other comparable measures that would achieve the conservation easements for Important Farmland. This comment was originally presented in Comments H-15 and H-16. Please refer to the responses to these comments. As described therein, the CPUC has revised Mitigation Measure AG-1 in the FEIR, including in Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR.

Response to Comment H-116

This comment notes that the title of Applicant Proposed Measure (APM) BIO-1 in the MMRP does not match the title of the same APM elsewhere in the DEIR. The commenter is correct that the title of APM BIO-1 is incorrect in the MMRP. This has been corrected in Appendix F, *Mitigation Monitoring and Reporting Program*, page F-29, in Volume 2 of the FEIR. For the revised text, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR.

Response to Comment H-117

The comment suggests revising the text of Mitigation Measure BIO-1 to state that a CPUC-approved biologist only needs to inspect uncovered and unfenced steep trenches and excavations during construction twice daily. In response to this comment, the text of Mitigation Measure BIO-1 in Appendix F, *Mitigation Monitoring and Reporting Program*, has been revised and some of the proposed revisions included in Comment H-117 have been incorporated. (FEIR, Volume 2, p. F-39.) Even fenced trenches can become deadfall traps, as fences for people do not necessarily stop all animals. Therefore, the request to limit inspections to unfenced steep trenches is not justified. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR. The revisions to Mitigation Measure BIO-1 have also been carried over to Section 4.4, "Biological Resources," in Volume 1 of the FEIR.

Response to Comment H-118

The comment suggests revising the text to state that biological construction monitoring reports will only be sent to the CPUC, and not to other responsible agencies, since there are no permits held with regulatory agencies at this time. In response to this comment, the text on page F-38 of Appendix F, *Mitigation Monitoring and Reporting Program*, in Volume 2 of the FEIR, has been revised and the proposed revisions included in Comment H-118 have been incorporated. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR. The revision has also been carried over to Section 4.4, "Biological Resources," in Volume 1 of the FEIR.

Response to Comment H-119

The comment clarifies that gravel bags and sediment controls would be implemented per the SWPPP, and therefore, the comment argues that the placement of gravel bags does not need to be mentioned in Mitigation Measure BIO-1. The comment also reiterates how impacts to wetlands, waters of the state, and riparian areas will be avoided or minimized through the proposed APMs and mitigation measures. While CPUC agrees with the proposed deletion, additional revisions are necessary to clarify that erosion and sediment control BMPs will be implemented as part of the SWPPP. Therefore, the text of Mitigation Measure BIO-1 in Appendix F, *Mitigation Monitoring and Reporting Program*, has been revised. (FEIR, Volume 2, p. F-38.) The revised language is provided in Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR, and is also shown below. The changes to Mitigation Measure BIO-1 have also been carried over to Section 4.4, “Biological Resources,” in Volume 1 of the FEIR.

~~Gravel bags shall be placed along the bottom of the fence to minimize erosion or sedimentation into nearby wetlands and/or waters of the U.S., and removed upon completion of construction.~~ Any project related work scheduled to occur within the exclusion/buffer zone of the wetland shall be conducted when the wetland is dry as determined by the approved biological monitor. Best management practices (BMPs) referred to in APM BIO-3 indicate stormwater and water quality protection BMPs. Erosion and sediment control BMPs shall be included in the SWPPP for the Proposed Project or alternative and shall be fully implemented during construction. These BMPs shall effectively minimize any erosion or sedimentation into nearby wetlands and/or waters of the U.S., and shall be removed upon the completion of construction.

Response to Comment H-120

The comment suggests revising the dates for the nesting bird season in APM BIO-2 to indicate that the nesting season for golden eagles commences on January 15, while the nesting season for all other birds commences on February 1. This comment appears to erroneously refer to Appendix F and APM BIO-2 when the actual language quoted by the commenter is in Section 4.4, “Biological Resources,” on page 4.4-47, in Volume 1 of the FEIR. The text in this section has been revised as requested by the commenter. For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 1 of the FEIR.

Response to Comment H-121

The comment states that the substation’s proposed location is an active vineyard with very low potential to support special-status plant species; therefore, the comment argues that Mitigation Measure BIO-2 should not apply to HWT. The comment suggests removing references to HWT within Mitigation Measure BIO-2. In response to this comment, while there is a low likelihood that special-status plant species would be present at the substation’s proposed location, the location’s status as a vineyard would not preclude the presence of such species, particularly if the seller limits vegetation maintenance in preparation for sale of the property. In the unlikely event that special-status plant species are encountered, the mitigation measure should still apply to HWT. Therefore, no changes to the DEIR text have been made.

Response to Comment H-122

The comment identifies a typographical error in Mitigation Measure BIO-3 with respect to “operational construction” work. In response to this comment, the text of Mitigation Measure BIO-3 in Appendix F, *Mitigation Monitoring and Reporting Program*, has been revised and the proposed revisions included in Comment H-122 have been incorporated, correcting the typographical error. (FEIR, Volume 2, p. F-43.) For the revised language, refer to Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR. This change to Mitigation Measure BIO-2 has also been carried over to Section 4.4, “Biological Resources,” in Volume 1 of the FEIR.

Response to Comment H-123

The comment clarifies that the substation will not impact blue oak woodland habitat; therefore, the comment argues that Mitigation Measure BIO-4 should apply to PG&E components only. Vegetation communities at the Estrella Substation site are mapped in Appendix P, *Biological Resources Technical Report for Estrella Substation*, of the Applicants’ PEA (refer to Figure 6 in Appendix P), which is incorporated by reference into the EIR. Based on the larger substation parcel described earlier in the comment letter (see “Minor Project Refinement” and the figure showing the larger parcel in Comment H-50) and disclosed in the Recirculated DEIR, there is a small area of blue oak woodland now included in the substation parcel. Although not anticipated, there is potential for this area to be impacted if the parcel is fully developed in the future. Therefore, it is not warranted to remove HWT from the requirements of Mitigation Measure BIO-4.

Response to Comment H-124

This comment suggests inclusion of additional text in Mitigation Measure GEO-1 to indicate that recommendations found in any subsequent addendums to geotechnical investigation reports would be implemented. Note that PG&E has also suggested revisions to this passage of the EIR (refer to Comments J-216 and J-294). Since PG&E’s suggested language is inclusive of, and expands upon, HWT’s, PG&E’s revisions have been incorporated into the FEIR. (FEIR, Volume 2, p. F-69.) Refer to Response to Comments J-216 and J-294. The revised language is shown in Chapter 4, *Revisions to the DEIR*, and Volume 2 of the FEIR. The revisions to Mitigation Measure GEO-1 have also been carried over to Section 4.7, “Geology, Soils, Seismicity, and Paleontological Resources,” in Volume 1 of the FEIR.

Response to Comment H-125

The comment suggests Mitigation Measure NOI-1 should not apply to ground-level construction activities. Refer to Response to Comment H-19.