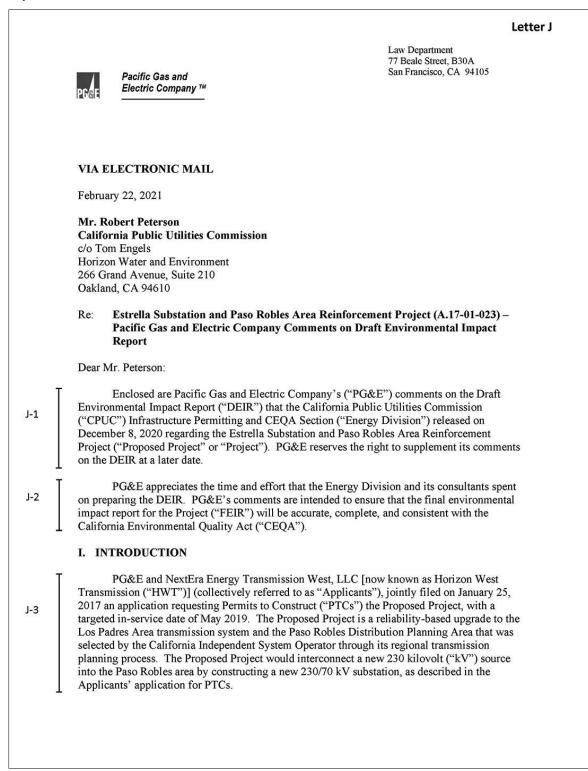
Letter J: Mathew Swain, Paragon Legal for Pacific Gas and Electric Company (February 22, 2021)



PG&E appreciates the opportunity to provide comments on the DEIR. PG&E's comments consist of this cover letter, Attachment 1 (Text Corrections and Requests for Clarification), Attachment 2 (Comments on Behind-the-Meter Analysis), Attachment 3 (Revised Air Quality Analysis) and Attachment 4 (Revised Helicopter Noise Analysis). PG&E requests that the CPUC incorporate into the FEIR the information and proposed revisions to the DEIR presented in this letter and Attachments 1-4 hereto.

II. COMMENTS ON OVERARCHING CEQA ISSUES

A. The CPUC's Distribution Project Objective Should Include Enhanced Reliability To Be Consistent with the Fundamental Underlying Purpose of the Proposed Project

CEQA requires an EIR to contain a clearly written statement of the underlying fundamental purpose and the objectives sought by the proposed project, which will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and aid the decisionmakers in preparing findings or a statement of overriding considerations, if necessary. (*See* CEQA Guidelines § 15124(b).) The project objectives are integral to the analysis of alternatives because CEQA requires an EIR to focus on alternatives that can eliminate or reduce significant environmental impacts while attaining most of the project objectives. (*Id.* at § 15126.6(a)-(b).)

The fundamental underlying purpose of the Proposed Project is to reinforce the electric transmission and distribution system in the Paso Robles Distribution Planning Area (DPA), as reflected in the name of the project: the Estrella Substation and Paso Robles Area *Reinforcement* Project. Reinforcement in this case means improving the reliability, capacity and flexibility of the interconnected transmission and distribution systems in the DPA.¹ However, the CPUC, functioning as the CEQA lead agency in charge of preparing the DEIR, asserts that improving distribution service reliability is not a driver of the project: "The issue of long feeders and poor service reliability was not identified as a fundamental project objective by the CPUC; however, it is considered a beneficial effect of the Proposed Project." (DEIR p. 2-6.) In other words, the distribution project objective in the DEIR references increasing capacity, but not enhancing reliability. As a result, the DEIR does not take into account reliability enhancement when it evaluates the two battery energy storage system ("BESS") alternatives, Alternatives BS-2 and BS-3, to the reasonably foreseeable distribution components of the Proposed Project.

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¹ The Proposed Project would accomplish these fundamental reinforcement goals by constructing a new substation that would (1) interconnect a second existing 230 kV transmission line into the DPA, (2) create a second 70 kV power source for the Paso Robles and San Miguel substations by constructing a 70kv power line connecting these substations to Estrella Substation, (3) include space for new 70/21 kV transformers to meet anticipated distribution demand in the DPA that will likely exceed existing capacity in approximately five to 15 years, (4) be located close to the area in which demand is forecasted to increase, (5) be located where it would be relatively easy to interconnect with existing distribution circuits, (6) shorten existing distribution feeders from Templeton Substation that now travel long routes into the Paso Robles DPA, and (7) provide additional substation 230/70kV transformer bank capacity that can be shared by substations within the DPA during substation maintenance, outages, and clearances to improve operational flexibility and reliability within the DPA. The Applicants' described the underlying purpose of the Proposed Project in PEA Section 1.3 ("Purpose, Need, and Project Objectives) and PEA Appendix G ("Distribution Need Analysis").

Mr. Robert Peterson February 22, 2021 Page 3 The DEIR should factor distribution reliability into its comparison of the two BESS alternatives to the reasonably foreseeable distribution components. The DEIR already acknowledges that the reasonably foreseeable distribution components: J-8 would address existing undesirable conditions and projected load growth in the distribution system in the Paso Robles area. As described in detail in Appendix G of the Applicants' PEA, the Paso Robles system is characterized by very long distribution feeders particularly those extending from Templeton Substation (see Figure 2-4). This is undesirable because long feeders are more susceptible to potential outages caused by vehicle pole strikes, downed vegetation from storms, or other incidents (NEET West and PG&E 2020a). Additionally, outages that occur on long feeders may affect larger numbers of people than similar events that occur on feeders of moderate length. (DEIR p. 2-6.)² The DEIR recognizes that the Proposed Project is sited and designed to address these 'undesirable" reliability issues: J-9 Locating the new substation at its proposed location would allow for the long feeders to be split in half and for some of the load currently being served by the Templeton Substation to be served by the new Estrella Substation. Reducing the length of these feeders would reduce potential outages for customers in this area and improve the reliability of the distribution system in this area. (DEIR p. 2-6.) Additional details about the distribution reliability benefits of the Proposed Project are provided in PEA Appendix G. To summarize, if and when the reasonably foreseeable J-10 distribution components are added at the proposed Estrella Substation (assuming the CPUC approves its construction), all customers within the Paso Robles DPA will enjoy reliability benefits because installing three new 21 kV distribution circuits will shorten distribution feeder line lengths out of Templeton Substation, share load with existing circuits and substations, and provide critical back feed support and redundancy to respond to real-time operational needs. (PEA Appendix G at UG-27 to UG-28.) Given the important role of enhancing distribution reliability in the fundamental J-11 underlying purpose and design of the Proposed Project, the distribution project objective should specifically include "improve service reliability." At the very least, the DEIR should discuss whether Alternative BS-2 or BS-3 would enhance the reliability of the existing distribution system by rectifying existing "undesirable J-12 conditions" or achieve the other reliability enhancements of the Proposed Project. PG&E contends that they would not. Adding solar and battery storage could provide additional generation and storage capacity to the DPA (see comments in Attachment 2), but they would not reduce the length of the Templeton 21 kV feeders, nor would they create back ties into existing ² The DEIR pulls extensively from PEA Appendix G and provides outage data and statistics that highlight the service reliability issues that currently exist. (DEIR pp. 2-6 to 2-11.)

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J-12 cont.	circuits that enable load transfers between substations during emergencies, clearances, or planned maintenance. In fact, battery storage systems can actually hinder system operational flexibility and reliability since, once discharged, they must be recharged to support load. Depending upon the duration of outages or maintenance windows, the batteries may not be able to be charged until the circuit and the system returns to normal or may not provide needed electricity supply during the full duration of a maintenance or outage window.
	B. The DEIR Does Not Present Substantial Evidence On Which To Conclude that Alternative BS-2 or Alternative BS-3 Is Environmentally Preferable To the Reasonably Foreseeable Distribution Components of the Proposed Project
J-13	The DEIR does not contain substantial evidence to conclude that Alternatives BS-2 and BS-3 are environmentally preferable to the reasonably foreseeable distribution components that PG&E proposed.
J-14	The DEIR states at the beginning of the impacts discussion in Chapter 4 that: "Because the specific characteristics of Alternatives BS-2 and BS-3 are unknown, these alternatives are evaluated for illustrative purposes in the DEIR. Consistent with CEQA Guidelines section 15145, no significance conclusions are provided for the Alternative BS-2 and BS-3 impact discussions." (DEIR at 4.0-2 to 4.0-3.) For example, in the evaluation of aesthetic impacts in Section 4.1, the DEIR states:
	Overall, because FTM BESS sites were selected for illustrative purposes only, BESS installations have not been designed and technologies have not been selected, and the specifics of Alternative BS-2 are unknown, project-level determinations cannot be made as impacts are speculative. Therefore, consistent with CEQA Guidelines section 15145, no significance conclusion is provided for any of the significance criteria. (DEIR at 4.1-53.)
	Overall, due to the fact that specific locations and characteristics of BTM resources procured under Alternative BS-3 are unknown at this time, project-level impact determinations are not possible as the impacts are speculative. Therefore, consistent with CEQA Guidelines section 15145, no significance conclusion is reached under any of the significance criteria. (DEIR at 4.1-54.)
J-15	This finding that impact determinations for Alternatives BS-2 and BS-3 would be speculative is repeated in Sections 4.2 to 4.20, which represent all resource areas evaluated in the DEIR.
J-16	Given these findings, the DEIR lacks substantial evidence to conclude that: "Impacts [of the reasonably foreseeable distribution components] would be greater than under the alternative combinations evaluated because of the approximately 1.7 miles of new distribution line and 8 miles of reconductoring." (DEIR p. 5-15.) The DEIR cannot compare actual impact findings regarding the reasonably foreseeable distribution components to speculative assessments of the impacts of Alternatives BS-2 and BS-3 and conclude that these alternatives are environmentally preferable.

		Page 5 C. The DEIR Should Not Recommend Implementation of Alternative BS-2 or BS-3
		Because the Decision Whether a BESS or Any Other Kind of Distributed Energy Resources Will Be Implemented Instead of the Reasonably Foreseeable Distribution Components Will Be Determined In a Separate CPUC Proceeding
-17		The DEIR should clearly state that whether Alternative BS-2 and/or BS-3, or some other Distributed Energy Resource (DER), gets implemented instead of the reasonably foreseeable distribution components of the Proposed Project will not be decided in the PTC proceeding. Instead, the decision to implement a DER solution or the reasonably foreseeable distribution components would be made in a separate CPUC proceeding, the Distribution Infrastructure Deferral Framework (DIDF) pursuant to the Distribution Resources Plan proceeding (R.14-08-013). At the time that PG&E determines that the energy demand and reliability concerns in the DPA warrant constructing the reasonably foreseeable distribution components, PG&E will identify this as a "planned investment" in its annual Grid Needs Assessment (GNA) and Distribution Deferral Opportunity Report (DDOR). At that point, DER alternatives to the proposed distribution investment, which may include Alternative BS-2 and/or BS-3 among other DERs, will be considered in the annual DIDF.
-18		Thus, no findings are appropriate – in either the DEIR or the current PTC proceeding – to establish that Alternative BS-2 and/or BS-3 is environmentally preferred to the reasonably foreseeable distribution components. As noted above, PG&E disagrees that the DEIR has established that Alternatives BS-2 and BS-3 would "likely" reduce environmental impacts as compared to the reasonably foreseeable distribution components (DEIR pp. ES-5, 5-15) because this finding is based on hypothetical, illustrative BS-2 and BS-3 alternatives for which no impact determination is made (DEIR p. 3-112).
-19	Ι	In addition, PG&E offers a number of clarifying comments regarding the discussion of Alternatives BS-2 and BS-3 and the role of the DIDF proceeding.
-20	I	The DEIR states that both Alternatives BS-2 and BS-3 could be "developed" through the DIDF proceeding. (DEIR pp. ES-13, 5-16.) PG&E clarifies that DER alternatives (including but not limited to BS-2 and BS-3) to the reasonably foreseeable distribution components will be <i>evaluated</i> in the DIDF. No alternatives are developed in the DIDF.
-21		Furthermore, the DIDF evaluation is technology agnostic so all DER alternatives would be evaluated equally, with no preference given to Alternative BS-2 or BS-3. As the DEIR notes: It is anticipated that BTM resources installed as an alternative to the Proposed Project would be procured under the CPUC's DIDF pursuant to the Distribution Resources Plan or its successor proceeding The DIDF is technology neutral but, for the purposes of this CEQA analysis, solar and battery storage DERs were assumed. Other types of DERs could also be procured, such as energy efficiency and demand response. (DEIR p. 3-134.)
-22	Ţ	PG&E agrees that DER alternatives, including alternatives other than a BESS, would be evaluated and potentially procured in the DIDF, making a finding in the DEIR or the current

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PTC proceeding on Alternatives BS-2 and BS-3 inappropriate and in conflict with the Distribution Resources Plan.

PG&E agrees with the statement in the DEIR that: "The size of the BESS required would be dictated by the grid capacity needs PG&E identifies pursuant to their annual Grid Needs Assessment and Distribution Deferral Opportunity Report filing to the Distribution Resources Plan proceeding (R.14-08-013) or its successor proceeding." Further, given that the size and location of the DER alternative would be dictated by the GNA and DDOR in the Distribution Resources Plan, it is impossible to evaluate Alternative BS-2 or BS-3 without knowing the specific electrical system needed, the required battery storage size, and the location needed. No findings should be made in the DEIR about the environmental preferability of these alternatives. Instead, the BESS alternatives should be evaluated with other potential DERs in the Distribution Resources Plan once PG&E decides to make a planned investment in the reasonably foreseeable distribution components.

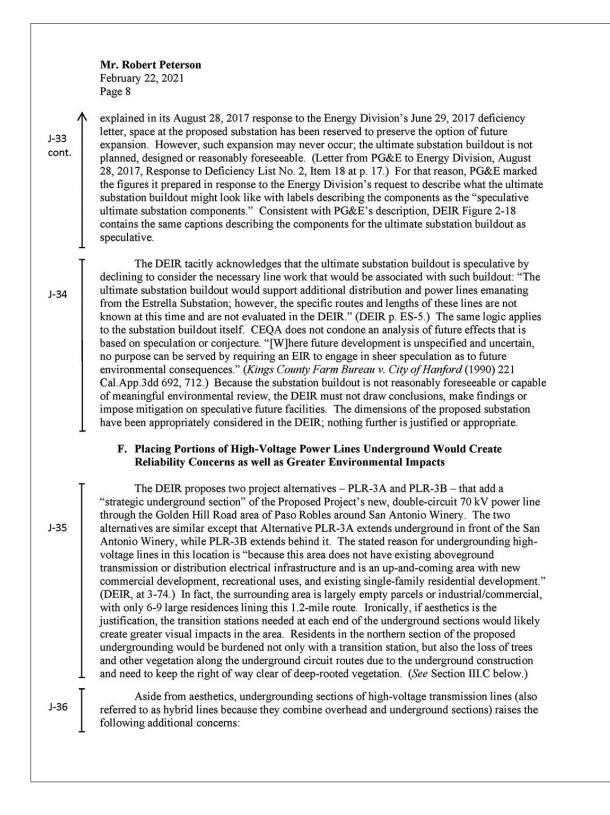
PG&E disagrees with the following statement: "In PG&E's 2018 and 2019 filings, the distribution capacity requirements identified ranged from 3.4 MW to 5.9 MW (CPUC 2020). In their 2020 filing, however, PG&E indicated that the distribution capacity need no longer exists within the 10-year planning horizon (PG&E 2020a)." (DEIR p. 3-126.) In fact, a distribution capacity need does still exist and PG&E identified it in its 2020 GNA and DDOR. These reports state that the reasonably foreseeable distribution components of the Proposed Project are no longer considered a timely solution to this need; therefore, a planned emergency expansion of the existing San Miguel Substation in the Paso Robles DPA was identified and is being pursued instead.

The DEIR contains an incorrect statement regarding the cost effectiveness cap that would be used in the DIDF to evaluate DER alternatives to the reasonably foreseeable distribution components. The DEIR states: "As of 2019, the reasonably foreseeable distribution components associated with the Proposed Project were estimated to cost \$18.5 million (CPUC 2020). For Alternative BS-2 and BS-3 to be developed through the DIDF, the cost cap would be less than this amount since the DER solution needs to be cost-effective." (DEIR p. 5-16.) PG&E agrees that any DER solution evaluated in the Distribution Resources Plan would need to be less than the cost effectiveness cap, but it is factually incorrect that the cost cap would be "less than this [\$18.5 million] amount." The \$18.5 million was the unit cost, not the cost cap, for the reasonably foreseeable distribution components, which is not currently a "planned investment." Instead, the annual DIDF will evaluate any new planned investment in that area, which would include the reasonably foreseeable distribution components if PG&E proposes them during that annual cycle. Any cost cap would be determined as part of that annual DIDF process. PG&E believes it is not accurate or relevant to the CEQA evaluation to introduce the incomplete \$18.5M figure within this DEIR.

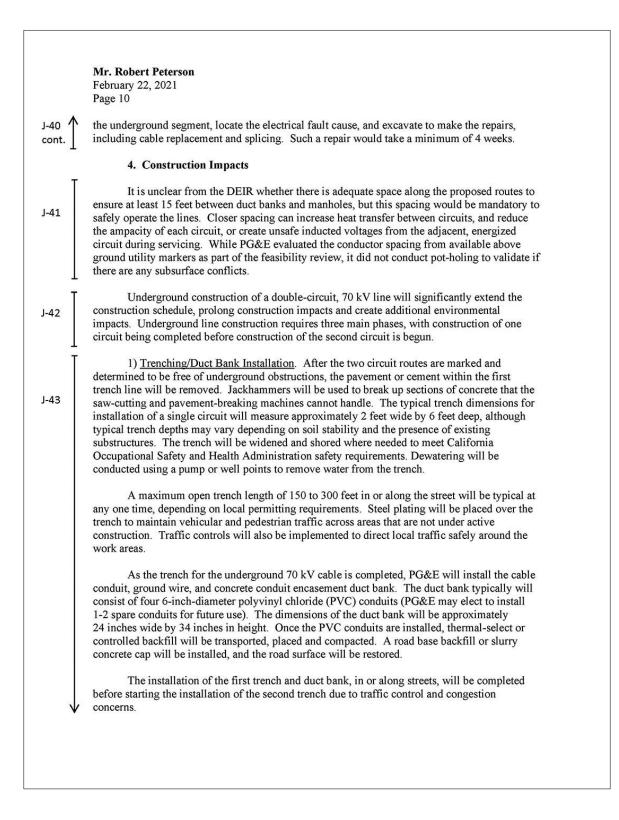
D. The Analysis of Alternative BS-3 Is Flawed

PG&E offers a number of comments on the DEIR's discussion of Alternative BS-3 in DEIR Chapter 3 and the supporting study, Behind-the-Meter Solar Plus Storage Adoption Propensity Analysis (BTM Analysis), provided by the CPUC as Appendix B to DEIR

Mr. Robert Peterson February 22, 2021 Page 7 J-26 Appendix B. PG&E provides detailed comments on the BTM Analysis in Attachment 2 hereto. cont. PG&E provides a snapshot of some of the key comments here. First, the BTM Analysis is speculative at its heart, admitting that "Economic propensity analyses simply identify customers for which it would make economic sense to adopt a J-27 technology, not necessarily what is likely to occur." (BTM Analysis p. 14). The BTM Analysis does not constitute substantial evidence that any one residential or commercial customer would decide to install a BTM BESS. Second, the BTM Analysis overestimates the number of customers in the DPA. It states that there are approximately 75,000 customers in the DPA, whereas PG&E's records show that J-28 there are approximately 47,000 customers in the DPA. By overstating the number of customers in the DPA by nearly 60 percent, the study overestimates the number of customers for which it may make economic sense to install a BTM BESS. Third, the hosting capacity analysis provided in the BTM Analysis is flawed because it assesses the hosting capacity of each distribution circuit in the DPA. Actual hosting capacity of J-29 a particular circuit in the DPA is limited to the hosting capacity of each segment of the circuit, which can be far lower than the theoretical hosting capacity of the circuit as a whole. For example, DEIR Table 3-20 shows an adoption potential on the Paso Robles 1102 circuit of 4.8 MW or 7.3 MW of solar plus storage for a Low or High Scenario, respectively. (DEIR p. 3-133.) In comparison, PG&E's published ICA data from October 2020 shows a maximum hosting capacity of 0.84 MW on the Paso Robles 1102 circuit. The scope and magnitude of distribution upgrades required to interconnect BESS above and beyond actual hosting capacity limits is unknown at this time, and have not been assessed in the DEIR. Fourth, the BTM Analysis incorrectly assumes that BESSs would be able to discharge J-30 energy to PG&E's distribution system in the DPA. In fact, no commercially available residential battery storage system is currently approved to discharge to PG&E's grid. Fifth, a master control system that the BTM Analysis and the DEIR hypothesize would be needed to coordinate the discharge of energy from BTM batteries to the grid to offset peak J-31 demand does not exist at this time. Even if the batteries were approved to discharge to the grid, this master control system is not described or evaluated in the BTM Analysis. Any control system would require telemetry from circuits/banks/various circuit locations where capacity constraints exist in order to trigger BESS dispatch to mitigate overloads. The location of the BESS would have to be sited specific to distribution facility deficiencies. In light of the foregoing, as elaborated on in Attachment 2 hereto, the BTM Analysis in J-32 the DEIR does not constitute substantial evidence in support of Alternative BS-3. E. The DEIR Should Clarify that the Ultimate Substation Buildout Is Speculative and Not Part of the Proposed Project Chapters 2, 4 and 5 of the DEIR should be revised to clarify that the ultimate substation J-33 buildout is speculative and not included in the CEQA review of the Proposed Project. As PG&E



Mr. Robert Peterson February 22, 2021 Page 9 1. Limiting Transmission-Level Service Available to Large Block Loads Installing a hybrid line could jeopardize the availability of power critical to large transmission-level block loads that may want to locate within the Golden Hill Industrial Park. J-37 First, the cost to serve a large customer from an underground transmission section of line would likely be prohibitive for the customer since one of the underground circuits would have to be looped in and out of the customer's substation facility (see paragraph 5 below). Moreover, serving these large transmission-level block loads with hybrid lines would be ill-advised for the reliability concerns described in paragraphs 2-3 below. 2. Lengthy Fault Outages The DEIR alludes to the challenges of isolating faults along an underground line, and the time it could take to do so. It suggests, however, that transition stations at each end of the underground sections would address the issue of lengthy outages, which is only partially true. J-38 Transition stations with monitoring capabilities (differential type relays) would be able to determine whether a fault is located in the underground portion of the line; if it is not, local repair crews would be able to concentrate repair efforts on the overhead sections of the line and handle repairs more quickly. With differential relays detecting no faults, retesting of the underground line segment could occur as soon as the line cools - in about 30 minutes. However, if the fault is in an underground section of the lines, lengthy outages can be expected, as PG&E's transmission underground crews must travel from Daly City to the underground segment, locate the electrical fault cause, and make the repairs. As the DEIR points out, lengthy delays would occur if transition stations are not constructed: J-39 Without the transition stations and their electrical current differential sensing, the underground section of line would need to remain de-energized after any circuit fault and be patrolled and inspected by an underground specialist prior to reenergizing. This means that the entire circuit would remain de-energized until the underground section can be patrolled and inspected and cleared for reenergization. This could substantially lengthen the restoration time following a circuit fault, particularly given the fact that all Pacific Gas and Electric Company (PG&E) underground specialists are located in the San Francisco Bay Area and would need to travel down to the central coast area. (DEIR pp.3-74 to 3-75.) However, even with transition stations, a problem in the underground line section will require a lengthy trip for the troubleshooters, and a lengthy repair. 3. Dig-Ins Unlike overhead lines, underground lines are also vulnerable to dig-ins from excavations J-40 or directional drilling. While such issues are uncommon, the outages can be lengthy. For a digin that takes a line out of operation, PG&E's underground crews must travel from Daly City to



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2) <u>Vault Installation</u>. Splice vaults will be installed at approximately 1,600- to 2,000-foot intervals during trenching (approximately 10-12 vaults total for this segment). The total excavation footprint for a vault will be approximately 22 feet long by 12 feet wide by 10 feet deep. Installation of each vault will occur over a one-week period with excavation and shoring of the vault pit followed by delivery and installation of the vault, filling and compacting the backfill, and repaving the excavation area. Each underground circuit will require its own set of splice vaults (5-6 vaults per circuit over the 1.2-mile route).

3) <u>Cable Pulling, Splicing and Termination</u>. After installation of the conduit and splice vaults, PG&E will install cables in the duct banks. Each cable segment will be pulled into the duct bank, spliced at each of the vaults along the route, and terminated at the transition stations.

As noted in the DEIR, construction of the underground segment would take approximately one year (DEIR p. 3-86), adding approximately 9-12 months to the Project construction schedule. Traffic, air quality, noise and other construction impacts would be shared by residents and businesses in the area.

5. Excessive Increased Cost of Undergrounding

The DEIR cost estimates (Table 5-3, Alternative 1 Combination with Undergrounding) appear incorrect. The table indicates a 1.1-mile underground segment, while actually the segment is 1.2 miles long. Therefore, using the DEIR per mile cost, the resulting cost of undergrounding 1.2 miles would be \$21.2 million. However, according to PG&E experts, the per mile cost shown in Table 5-3 would be for a single circuit. The cost to install both circuits underground (which are in entirely different trenches at least 15 feet apart) would be over \$40 million. The cost for the 1.2-mile underground segment would be approximately 12 times the cost of 1.2 miles of the new overhead circuits (a \$3.6 million cost for the 1.2-mile, overhead, double circuit section is derived from DEIR Table 5-3). The extremely high cost to install underground transmission lines is unwarranted here and would be an unfair burden on ratepayers.

G. Mitigation Measures Should Not Apply To the Reasonably Foreseeable Distribution Components Because the PTCs Will Not Authorize Their Construction

The PTCs sought by the Applicants do not include authorization for PG&E to construct the reasonably foreseeable distribution components. The mitigation measures in the PTCs will apply to the project components Applicants are authorized to construct under the PTCs. Because PG&E is not seeking authority to construct the reasonably foreseeable distribution components under the PTCs, mitigation measures imposed under the PTCs should not apply to the reasonably foreseeable distribution components. For example, Mitigation Measure HYD/WQ-1 should be deleted. In addition, all references to "RFDC" in the "Applicability" column of the Mitigation Monitoring and Reporting Plan (DEIR Appendix F) should be deleted. PG&E will comply with all applicable laws and regulations if and when it constructs the distribution components, and will implement appropriate APMs, including those described in the DEIR if applicable at the time.

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III. Comments on Impact Analysis and Mitigation Measures

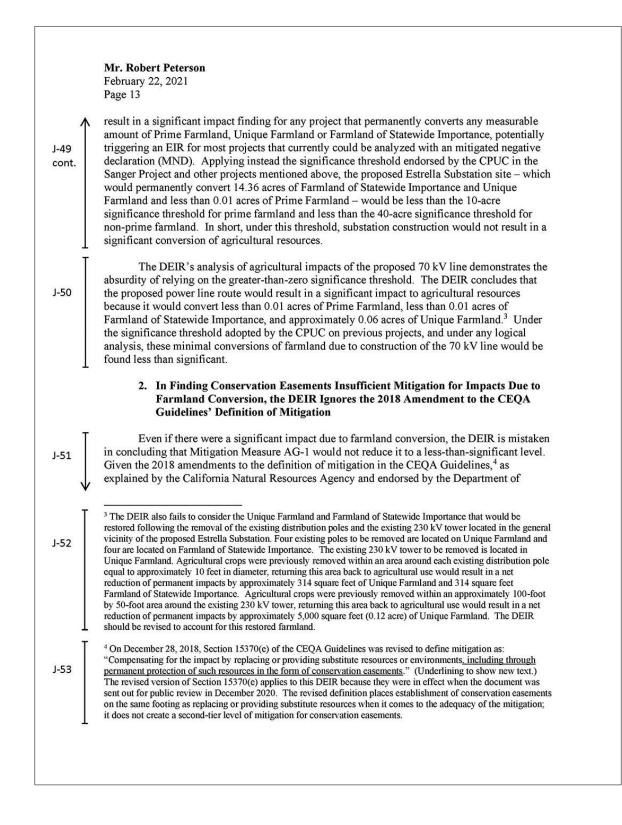
A. Because Impact AG-1 Is Not a Significant and Unavoidable Impact, Mitigation Measure AG-1 Should Be Removed or Revised To Be More Practicable

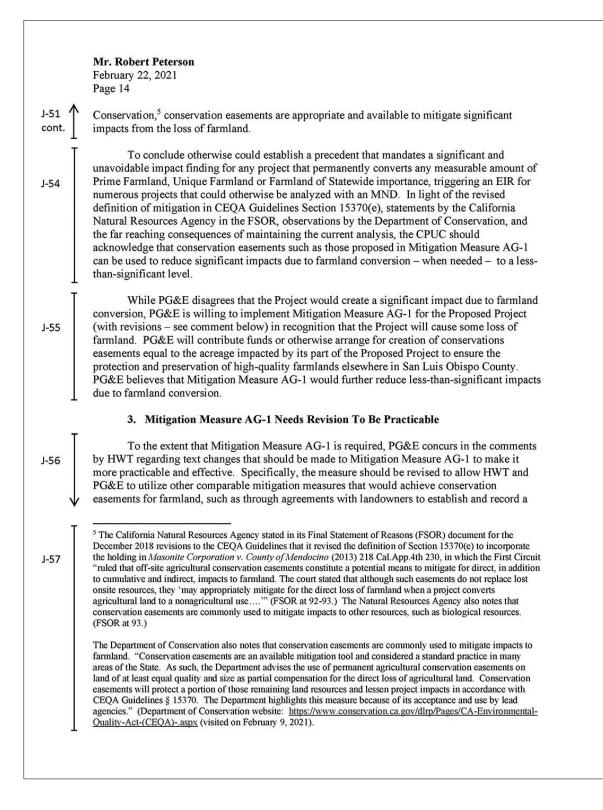
1. The Permanent Conversion of Farmland Resulting from the Proposed Project Is Below the Significance Threshold Used Previously by the CPUC, Which Should Be Used Here

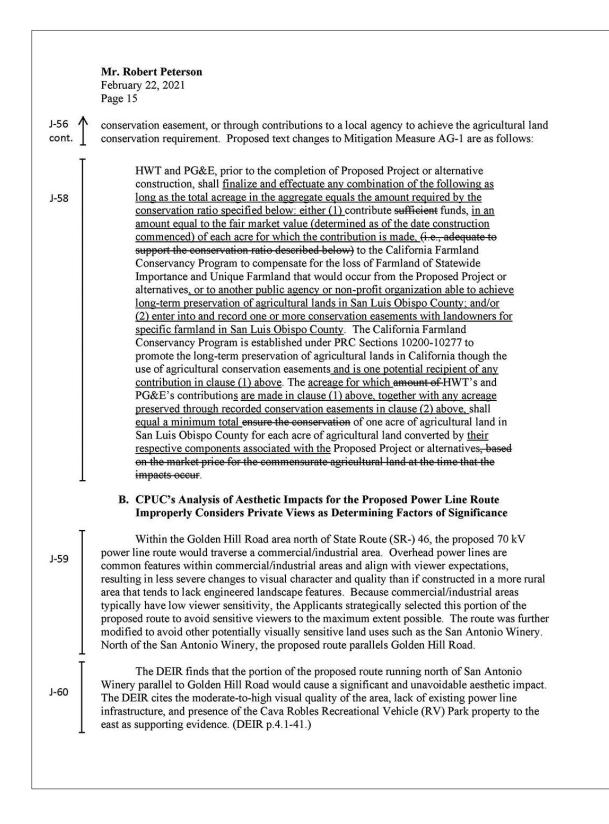
The CPUC determined that the Proposed Project's permanent conversion of 2.66 acres of Farmland of Statewide Importance, 11.70 acres of Unique Farmland and less than 0.01 acres of Prime Farmland is a significant and unavoidable impact. This conclusion is at odds with the threshold of significance applied by the CPUC in several recent siting cases. The CPUC appears to have interpreted the question posed in CEQA Guidelines Appendix G-whether the Proposed Project would "Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance . . . to nonagricultural use"-to be a significance threshold so that any amount greater than zero acres of permanent conversion of Prime Farmland, Unique Farmland or Farmland of Statewide Importance is a significant impact. However, the first paragraph of Appendix G: Environmental Checklist Form of the CEQA Guidelines specifically notes that "the sample questions in [Appendix G] are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance." Subsequent caselaw confirms that lead agencies are not required to use any of the questions in the checklist as standards of significance and may develop their own thresholds instead. See e.g., San Francisco Baykeeper, Inc. v State Lands Comm'n (2015) 242 CA4th 202, 227; Save Cuyama Valley v County of Santa Barbara (2013) 213 CA4th 1059, 1068; Mount Shasta Bioregional Ecology Ctr. v County of Siskiyou (2012) 210 CA4th 184, 205.

The significance threshold applied here contrasts with other siting proceedings in which the CPUC applied a standard of significance for permanent impacts to agricultural resources based on the Williamson Act's declaration that farmland is large enough to sustain agricultural use if it is at least 10 acres of prime farmland or at least 40 acres for land that is not prime farmland. Cal. Government Code § 51222. See Shepherd Substation Project IS/MND (May 2012)), pp. 3.2-8 to 3.2-9; Sanger Substation Expansion Project IS/MND (March 2017), p. 5.2-4; Gill Ranch Gas Storage Project Final Initial Study/MND (September 2009); SCE's Devers-Palo Verde No. 2 Transmission Line Project EIR (October 2006). See also SCE's Antelope-Vincent 500 kV Project, where the CPUC found that the total amount of Prime Agricultural Land that would be permanently disturbed could exceed "the 10 acres for Prime Farmland that has been established as the threshold level of significance for conflicting with a Williamson Act contract, thereby resulting in significant and unavoidable impacts." (D.07-03-045, March 15, 2007.) In other projects, the CPUC simply found the amount of converted farmland negligible compared to the amount of farmland available in the county-wide area. See Fulton-Fitch Mountain Reconductoring Project IS/MND (October 2017), p. 3.2-7; SCE Valley-Ivyglen and Alberhill Projects' combined EIR (April 2017), p. 4.2-6.

The significance threshold in these prior cases is far more reasonable than the illogical threshold proposed in the DEIR. The "greater-than-zero" threshold applied in the DEIR would







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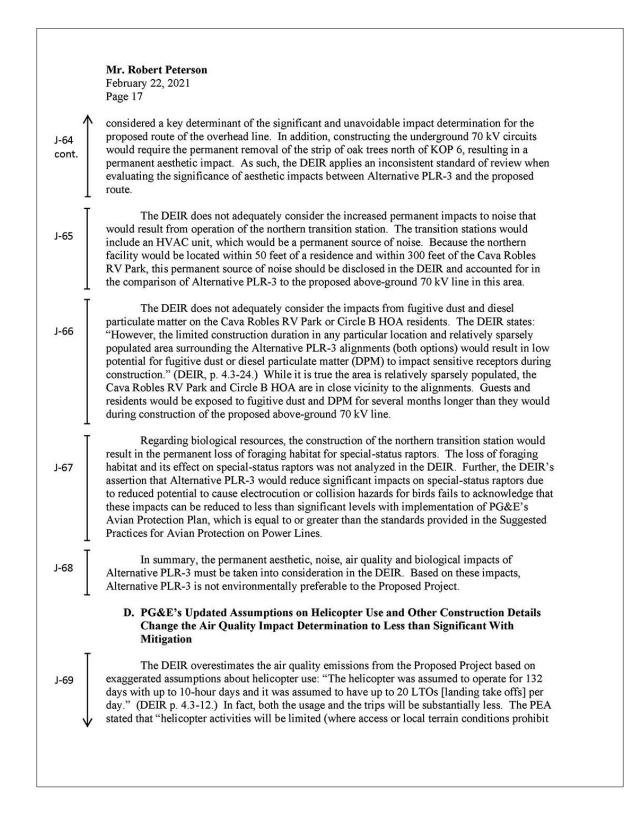
While the area does contain moderate-to-high visual quality and lacks existing power line infrastructure, the presence of the Cava Robles RV Park in the vicinity of the proposed route should not be a basis for determining visual significance. First, as the DEIR acknowledges at page 4.1-38, the significance criterion under which the DEIR found a significant and unavoidable impact (criterion c) only protects public views. (See CEQA Guidelines, App. G, §I.c (rev. effective 12-28-2018); see also Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal. App. 4th 477, 492 ("question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons").) Because Cava Robles RV Park is a private recreational facility, it should not be a factor in the DEIR's determination of significance. Second, the DEIR states that the Cava Robles RV park is designated as Parks and Open Space by the City of Paso Robles, seeming to imply that the power line would be visually incompatible with this land use designation even though the power line would not cross Cava Robles RV Park property. The fact that the power line would be sited outside the RV park should preclude the CPUC from relying on its land use designation to identify an incompatible aesthetic impact of an adjacent use. For these reasons, the DEIR improperly considers the proximity of the Parks and Open Space designation as a contributing factor in its determination of significance.

The removal of Cava Robles RV Park from consideration in the aesthetics analysis would leave only the moderate-to-high visual quality and lack of existing power line infrastructure along Golden Hill Road as the sole determinants of the impact determination. The significant impact identified at Key Observation Point (KOP) 6 should be weighed against the entirety of the proposed route, which the DEIR acknowledges would result in only incremental impacts. (DEIR p. 4.1-41.) Accordingly, PG&E disagrees with the CPUC's significant and unavoidable impact determination.

C. The DEIR's Analysis of Alternatives PLR-3A and PLR-3B Does Not Adequately Consider Impacts to Aesthetics, Noise, Air Quality, and Biological Resources, Which Indicate that these Alternatives Are Not Environmentally Preferable to the Proposed Project

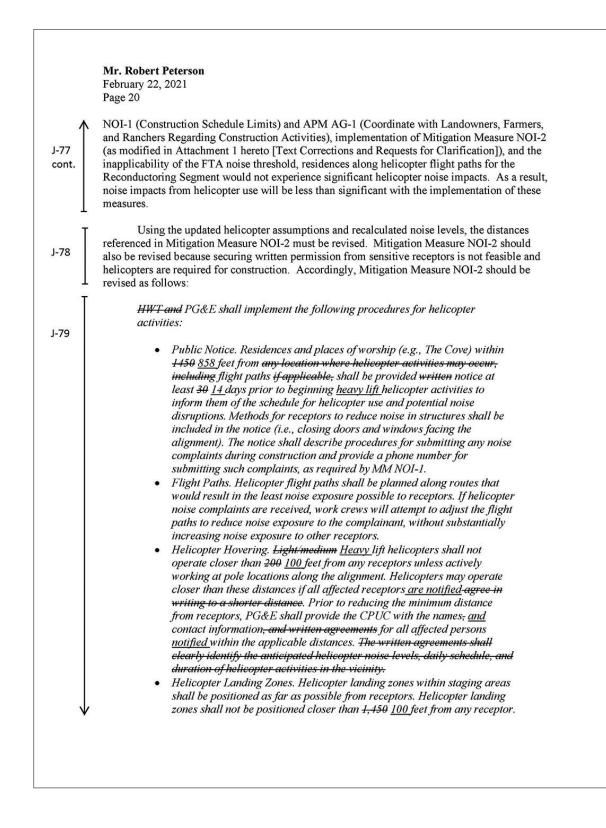
The DEIR concludes that Alternatives PLR-3A and PLR-3B (referred to in this comment as Alternative PLR-3 for simplicity) would avoid the significant adverse aesthetic effects identified along Golden Hill Road and, as a whole, are environmentally preferable to constructing the proposed overhead 70 kV line. This conclusion is inconsistent with the aesthetic, noise, air quality and biological resource impacts of Alternative PLR-3 identified in the DEIR.

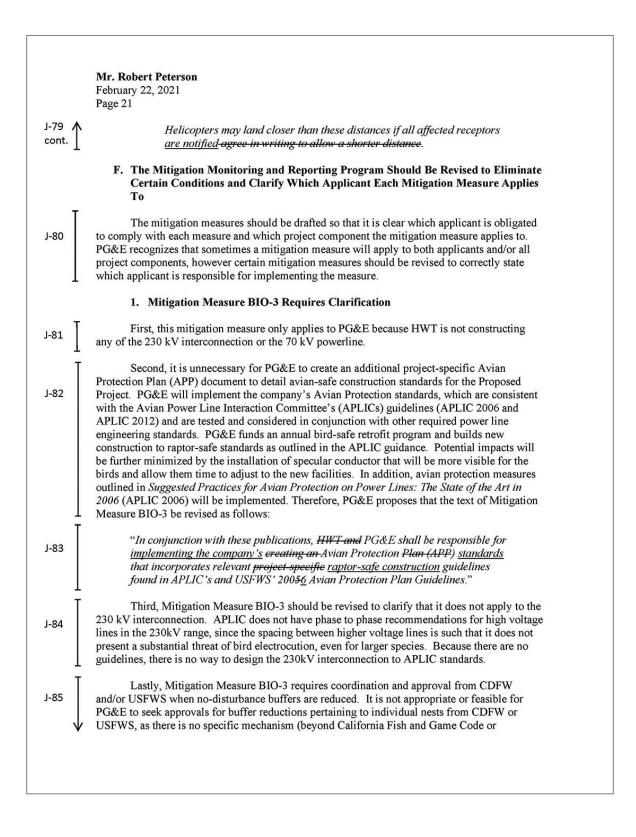
The DEIR fails to adequately account for the visual impacts resulting from the two 150foot by 150-foot transition stations that would need to be constructed at each end of the underground segment, particularly from the visual impact of the northern transition station. The northern transition station would permanently impact approximately 0.5 acres of blue oak woodland habitat, including removal of up to 47 oak trees, which the DEIR neglected to consider from an aesthetics perspective. Further, the northern transition station would introduce industrial facilities into an area that currently lacks utility infrastructure, a circumstance that was

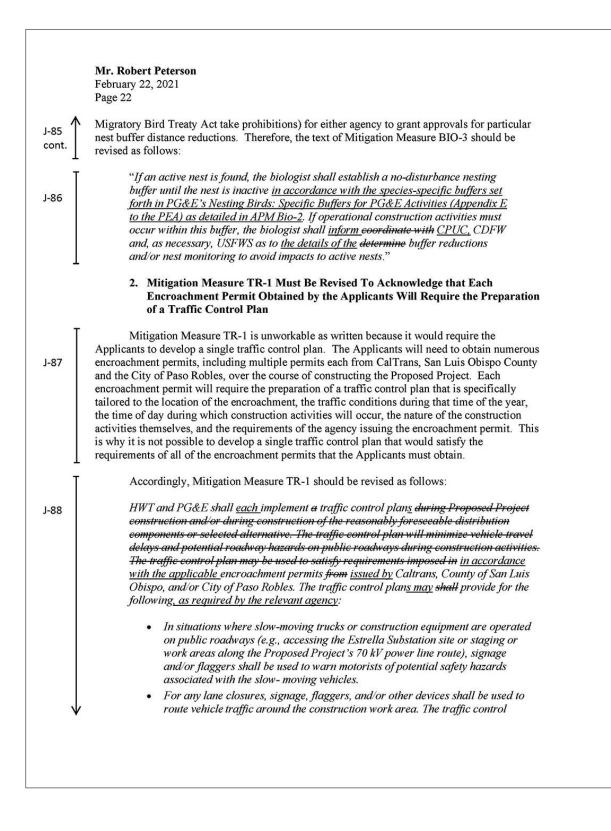


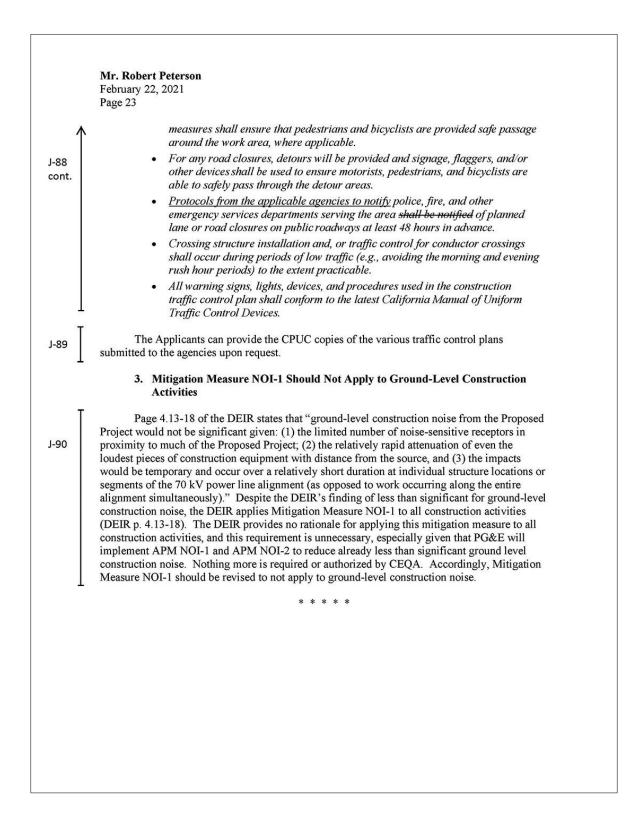
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J-69 cont.	the work from being conducted by ground-based crews and equipment, or during conductor installation and removal activities)," (PEA p. 3.3-21), and did not estimate daily hours or trips. However, the PEA did estimate that helicopters would be used "for about 132 days during the 7-month construction period." (<i>Id.</i>) With the latest project information available, PG&E was able to revise and clarify previous assumptions about helicopter use for greater accuracy (<i>see</i> Attachment 4 hereto [Helicopter Noise Analysis]). Under these updated calculations, the light/medium lift helicopter (only required for the 70 kV Power Line Conductor Installation) is assumed to operate for 6 days with approximately 4.3-hour days and have up to 10 LTOs per day. The heavy lift helicopter (only required for the Reconductoring Segment Pole Installation / Transfer Distribution / Pole Removal) is assumed to operate for 5 days with approximately 2.5-hour days and have up to 14 LTOs per day.		
J-70	The construction schedule was also updated to account for the phasing of construction and the addition of one week of grading at the 230 kV substation. The number of truck trips for the 230 kV substation was also updated based on reduced distance for delivery of aggregate materials during the Access Roads phase, increased number of trips for material deliveries during the Foundation Construction phase, reduced distance for water delivery due to use of the well adjacent to the site (except for the Control Enclosure Delivery and Installation and Testing and Commissioning phases), and addition of trips for the top soil reuse during the Cleanup and Restoration phase.		
J-71	With these updated assumptions, the air quality impacts and greenhouse gas emissions were recalculated to account for the changes to helicopter use, schedule and trips, as well as the emissions reductions from implementation of APMs and mitigation measures (<i>see</i> Attachment 3 hereto [Revised Air Quality Analysis]). The revised calculations indicate that air quality and greenhouse gas impacts would be less than significant with implementation of the APMs.		
J-72	Under the original calculations, the DEIR concludes that reactive organic gas (ROG) and nitrogen oxides (NOX) emissions would be significant even with the implementation of mitigation measures:		
	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 [sic] 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.		
	Even with implementation of Mitigation Measure AIR-1 [sic], ROG and NOX emissions would still be expected to exceed significance thresholds; therefore, this impact would result in a cumulatively considerable increase in criteria pollutants for which the region is in non-attainment, and the impact remains significant and unavoidable. (DEIR p. 4.3-17.)		

Mr. Robert Peterson February 22, 2021 Page 19 The basis for this significant impact determination is not substantiated because the DEIR 1-73 does not quantify mitigated emissions. In any event, with the revised calculations, the Proposed Project will not exceed the daily or quarterly threshold for ROG and NOX emissions. The Final EIR should be updated to incorporate these revised calculations and MM AQ-1 J-74 should be deleted. E. PG&E's Revised Noise Analysis Shows that Helicopter Noise Impacts Are Less than Significant with Mitigation, Not Significant and Unavoidable The DEIR uses the Federal Transit Administration (FTA) guidelines in the Transit Noise and Vibration Impact Assessment Manual to evaluate the significance of construction noise impacts; however, this manual is for transit projects and is inappropriate for determining the J-75 noise threshold of significance for the proposed utility project. Significance criterion a asks if the project would result in the "Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or in the applicable standards of other agencies." (Emphasis added.) As stated in the DEIR, "No federal laws, regulations, or policies for construction-related noise and vibration apply to the Proposed Project" (DEIR p. 4.13-4) and the FTA guidelines are not applicable to utility projects. Therefore, the Project would not increase ambient noise levels above any applicable standards and the DEIR should have found a less-than-significant impact under criterion a. Even if the FTA guidelines were applicable, the DEIR's reference to the construction noise criteria of 90 A-weighted decibel (dBA) equivalent sound level (Leq) for residential land J-76 uses is misleading. It does not specify that the criteria is 90 dBA Leq(1hr), which is the Aweighted equivalent sound level metric normalized over a one-hour time period, not an instantaneous value. As stated previously, the helicopter assumptions in the DEIR are inaccurate and resulted in an overestimate of the helicopter noise levels. PG&E has updated and clarified the assumptions about helicopter use and recalculated the noise levels in Attachment 4 hereto J-77 (Helicopter Noise Analysis). As a result of the reduced helicopter use, the distance from the helicopter activities to 90 dBA $L_{eq(1hr)}$ is substantially reduced. As described in the DEIR, there are residences as close as 100 feet to planned helicopter landing zones in this area and helicopters operating above pole installation locations could be as close as approximately 250 feet to residences. The light/medium lift helicopter to be used for the installation of conductor on the New 70 kV Power Line will not result in noise levels above 90 dBA Leq(1hr) at any distance. The heavy lift helicopter to be used for the Pole Installation / Transfer Distribution / Pole Removal on the Reconductoring Segment will not result in noise levels above 90 dBA Leq(lhr) at the residences from the helicopter landing zones or the pole installation locations, but may result in noise levels above 90 dBA Leq(lhr) for brief time periods at sensitive receptors along or within 858 feet of the flight paths. Travel along the flight paths will require less than two hours per day for five days and will move regularly along the flight paths. Due to the limited duration of travel along the flight paths, the mobile nature of the flights, implementation of APM









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		Very truly yours,			
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		<u>Company</u>			
	Attachments: Additional Documents Provided With This Letter:				
	Attachment 1:	Table of Text Corrections and Requests for Clarification			
	Attachment 2:	Comments on Behind the Meter Analysis			
	Attachment 3:	Revised Air Quality Analysis			
	Attachment 4:	Revised Helicopter Noise Analysis			