



California Public Utilities Commission



April 10, 2025

Michael Calvillo
Pacific Gas and Electric
1455 Shaw Ave, Bag 23
Fresno, CA 93710-8001

Re: Minor Project Refinement No. 2 for the Estrella 230/70 kilovolt (kV) (A.17-01-023) Comments

Dear Mr. Calvillo:

On March 31, 2023, the California Public Utilities Commission (CPUC) adopted the Final Environmental Impact Report (EIR) for the Estrella 230/70 kilovolt (kV) Project (Project) and approved the Project (Application 17-01-023). The decision granted Pacific Gas & Electric (PG&E) a Permit to Construct and approved the Project conditionally with the implementation of Applicant Proposed Measures (APMs) and Mitigation Measures adopted in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP). On January 17, 2025 PG&E submitted Minor Project Refinement No. 2 (MPR-2) requesting New Pole Site Relocation, Access Road Modifications, Tree Trimming, Crane Set Poles, and Temporary Distribution Poles and Generator Staging Areas.

The minor project refinements described in this request are located in the Phase 1 reconductoring component, from approximately Cary Street near South River Road to the intersection of Clubhouse Drive and North River Road in the city of Paso Robles, San Luis Obispo County, California. Please refer to Figures 1, 2, 3, 4, and 5 and the Google Earth KMZ file provided separately.

These modifications include:

1. Relocation of the Pull Site

- The relocated pull site is located between Poles 133 and 134. It has an irregular shape and covers approximately 0.9 acre, overlapping an area previously identified as a temporary pole work area for the Proposed Project route (as opposed to Alternative PLR-1A).

2. Access Road Modifications

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- The access road changes are related to a new housing development along North River Road, between River Oaks Drive and an unnamed road at Pole 133.

3. Tree Trimming

- The location of each tree is described below (Attachment 3):
 - Two blue oak (*Quercus douglasii*) trees for trimming are located just north of SR-46, on the southern side of Palo Alto Court north of River Oaks Drive across from a residential home (729 Palo Alto Court, Paso Robles, CA).
 - One cottonwood (*Populus deltoides*) tree for trimming is located just south of SR-46, on the southern side of an unnamed access road between two residential homes (2038 and 2041 Vista Oaks Way, Paso Robles, CA).
 - One casuarina (*Casuarina equisetifolia*) tree for trimming is located south of Creston Road west of Pole 166.
 - Two blue oak trees for trimming are located south of SR-46 west of Pole 148.
 - One coast live oak (*Quercus agrifolia*) tree for trimming is located at the end of Cary Street, east of Pole 182 near the Paso Robles Substation.

4. Crane Set Poles

- Poles 135, 136, 138a, 138b, 139, 140, 146, 147, 148, 172, and 173 may require a crane to set the poles.

5. Temporary Distribution Poles and Generator Staging Areas

- Two temporary distribution poles approximately 250 feet northeast of Pole 135 and a generator staging area approximately 175 feet east of Pole 144.

The Proposed Action involves several refinements to the project to accommodate changed field conditions and refined engineering designs. These refinements include:

1. Relocation of the Pull Site:



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- The pull site previously located east of Poles 135 and 136 would be moved approximately 130 feet north, partially underneath the alignment between Poles 133 and 134.

2. Access Road Modifications:

- A new unpaved temporary access road is required to access the relocated pull site.
- Additional temporary unpaved access roads are needed underneath the alignment between Poles 135 and 145, along the western boundary of the new River Oaks housing development.

3. Tree Trimming:

- To facilitate construction or access to Poles 146, 147, 148, 166, and 182, specific trees would need to be trimmed. (Attachment 3).

4. Crane Set Poles

- A crane may be required to set Poles 135, 136, 138a, 138b, 139, 140, 146, 147, 148, 172, and 173 from existing roadways.

5. Temporary Distribution Poles and Generator Work Areas

- Two distribution poles would be installed within a 50 × 50-foot work area for each pole location. Upon completion of the power line replacement, the poles would be removed. A 500-kW generator with a noise reduction barrier would be staged within an approximate 40 × 20-foot staging area in five parking spots located on Traditions Loop. The generator would operate 24 hours a day for approximately 3 days.

On April 15 and 16, May 8, and June 17 and 18, 2024, the project alignment was surveyed for special-status plant species. The area surveyed included poles 135 through 182, temporary pull sites along the alignment, and three potential staging areas located off North River Road, Ardmore Road, and Dallons Drive. The survey dates encompassed the appropriate bloom period for all 20 special-status plant species identified with potential to occur on-site. No special-status plants were observed during the 2024 surveys.



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The proposed refinements involve relocating a pull site to an area previously identified as a temporary pole work area, changing locations of access roads, trimming-additional trees, crane setting additional poles, and installing temporary distribution poles and a generator. The location of the proposed refinements are within the area that was surveyed for special-status plants in 2024 or would not result in ground-disturbing activities in the case of the generator; however, a portion of the relocated pull site access road modifications fall outside the survey area. This temporary pull site and associated temporary access road extends north-northwest approximately 150 feet beyond the boundary surveyed in 2024 (see Figure 1). The habitat within the relocated pull site is generally consistent with the habitat present in the adjacent portion of the project alignment that was surveyed for special-status plants in 2024. Based on negative survey results in 2024, the potential for special-status plants to occur in the new location is considered low. In spring and summer of 2025, rare plant surveys will be conducted in the areas that fall outside of the previously conducted rare plant survey. The survey will be conducted no earlier than March 1 to capture the blooming period of at least some of the potential rare plants that may occur.

Potential impacts to special-status plant species, if present during construction, could include removal of individual plants and intact seed banks, permanent conversion of occupied habitat, indirect impacts from dust emissions during construction, soil compaction, altered hydrology, or the spread of nonnative and invasive plant species to areas not previously impacted. PG&E would minimize potential impacts to special-status plant species by minimizing the number of trips to work locations, clearing only the minimum amount of vegetation necessary for access, cleaning equipment regularly to reduce the spread of invasive species, and matting the access roads if necessary due to wet conditions. In addition, preparation of the access roads and pull site would only include minor grading to take out high spots. No excavation (except for the pole holes) or import of fill materials (other than temporary matting) within the unsurveyed area would occur; therefore, it is expected that impacts to the seed bank would be minimal.

The potential for special-status plant species to occur within the relocated pull site or access roads is low, and potential impacts to special-status plant species would be minimized. In addition, no special-status plants were observed within the 2024 rare plant survey area, which covered the other refinements in this request, and new surveys will be conducted prior to construction within the unsurveyed areas. Therefore, the proposed refinements are not expected to result in any new impacts or increase the severity of previously analyzed impacts to biological resources.



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These changes can be seen in **Attachment 1 (Google Earth KMZ)**, **Attachment 2 (Figure 3)**, and **Attachment 3 (Tree Trimming Inventory)** provided. Changes associated with MPR-3 will comply with General Order (GO) 95, Public Resources Code (PRC) Section 4292, and California Code of Regulations (CCR) Title 14, Section 1252, California Public Utilities Code 8386.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Sanchez", is placed above the name of the signatory.

Boris Sanchez, AICP
CPUC Environmental Project Manager

cc: Michelle Wilson, CPUC CEQA Manager
Tom Engels, Montrose
Patrick Donaldson, Montrose
Lisa Herrera, Montrose
Erika Sagrafena, SWCA