

# Comment Set 1

Date \_\_\_\_\_

Nicolas Procos, CPUC  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 800  
San Francisco, CA 94104

Re: Atlantic-Del Mar Reinforcement Project

Dear Mr Procos,

As a concerned citizen, I oppose having High Voltage Power Lines, suspended 75 to 110 feet high, running for roughly four miles through historic, downtown Rocklin, along the railroad tracks. This proposal represents a threat to Rocklin's quality of life.

1-1

The City of Rocklin is currently protesting this proposal by Pacific Gas & Electric, asking that these power lines be put underground. I support this request, despite the costs involved, because it is the right thing to do. Overhead, high voltage power lines, cause many concerns that have not been fully addressed in the PG&E plan. For instance, Rocklin has renovated downtown with repaved streets, new landscaped medians and other improvements. Overhead power lines would take away from downtown's redevelopment, and permanently mar Rocklin's skyline. Crossing through town, residents would pass under these lines many times a day. At outdoor restaurants, church parking lots, and backyards, residents will hear the electrical buzzing sounds. This is a threat to our quality of life.

1-2

Safety issue will also ensue. Elector-Magnetic Field (EMF) emissions are problematic, whether real or perceived. Train derailments, however, could be cataclysmic. If a tower in the railroad corridor were struck, the impacts would be un-estimatable, especially if the tower struck the fuel depot on Sunset. Property value issues are also very real. Real estate agents are already having trouble showing properties in the downtown corridor. Property values will fall from 10% - 20%. This means that everyday people stand to personally lose from \$20,000 to \$50,000 on up, most without compensation from PG & E. This is devastating. Power to accommodate new growth is being supplied on the backs of the downtown residents through their loss of property value, just to save PG&E money. Property tax revenues would also decrease. This is not fair to anyone in Rocklin.

1-3

1-4

1-5

I am in support of having PG&E offer a plan to put the power lines underground, regardless of the cost, which, when spread across all PG&E customers Statewide, would be minimal to none. I stand behind the City of Rocklin and protest against overhead high voltage Power Lines.

1-6

Additional comments (handwrite or type) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sincerely,

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

(Sign letter, fold, seal and mail - Thank You!)

Comment Set 2

**McDONOUGH, HOLLAND & ALLEN**  
A PROFESSIONAL CORPORATION  
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November 14, 2001

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VIA OVERNIGHT MAIL

Nicolas Procos  
California Public Utilities Commission  
c/o Aspen Environmental Group  
235 Montgomery Street, Suite 800  
San Francisco, CA 94104

Re: Draft Mitigated Negative Declaration and Initial Study for Atlantic-Del Mar Reinforcement Project (A.01-7-004)

Dear Mr. Procos:

This firm represents Gensiro Kawamoto, owner of sixty-two (62) single family residences in the Oakridge Subdivision, which is adjacent to the proposed Atlantic-Del Mar Reinforcement Project (the "Project"). Mr. Kawamoto's property will be directly affected by the power lines and supporting poles that are proposed to be built as part of the Project. These comments are in response to the draft Mitigated Negative Declaration and Initial Study (the "Mitigated Neg. Dec.") that has been prepared for the Project. The Mitigated Neg. Dec. fails to address a number of environmental impacts that will significantly affect the area surrounding the Project, and will be especially detrimental to several single family houses owned by Mr. Kawamoto and to the residents living in those houses. Further, the Mitigated Neg. Dec. notes numerous potentially significant impacts that must be mitigated as part of the Project. Based on the significant impacts discussed in the Mitigated Neg. Dec., the California Public Utilities Commission ("CPUC") should prepare an environmental impact report ("EIR") to consider alternatives to the Project that may have a less significant impact on the environment. Finally, neither the CPUC nor the project proponent directly notified Mr. Kawamoto, an owner of property in close proximity to the Project, that the CPUC is considering adoption of the Mitigated Neg. Dec. and approval of the Project. Mr. Kawamoto learned of the project indirectly through the courtesy of one of his tenants. Given this notice deficiency, we suspect that other affected property owners may be unaware of the Project. The Mitigated Neg. Dec. therefore is not in compliance with the Public Utilities Commission Rules of Practice and Procedure section 17.1, and should not be approved by the CPUC.

YUBA CITY OFFICE

## Comment Set 2, *cont.*

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*The proposed Project will have a significant impact on the aesthetics of the area surrounding the Project*

In discussing impacts that the Project may have on aesthetics, the Mitigated Neg. Dec. states that although some poles and power lines to be constructed as part of the Project will be visible to residences located near the proposed Project, the Project will have a less than significant impact on the scenic resources of the area surrounding the Project, and will have a less than significant impact on the visual character of the Project area. The Mitigated Neg. Dec. suggests that the power lines would blend in with the surrounding development, and that the visual character of the area surrounding the Project will not be significantly impacted because the existing landscape is already defined by distribution lines and structures and transportation elements. (Mitigated Neg. Dec. pp. B-25, B-26.)

The Mitigated Neg. Dec. understates the impact that the power lines will have on the aesthetics of the residential area located near the proposed Project. A section of the proposed power lines will be placed directly outside the yards of several residential properties, including eight parcels owned by Mr. Kawamoto. We are unable to determine from the text of the Mitigated Neg. Dec. whether the Project, as proposed, will require condemnation of any of Mr. Kawamoto's property for pole construction or power line air rights. However, it is clear that, at best, the lines will run within a few feet of his property boundaries. The proposed power lines will have a dramatic impact on the visual character of these parcels. The power lines will damage any views from the backyards of the affected residences, based both on the unattractiveness of the poles and power lines and the proximity of the power lines to the affected houses. The Project will substantially impact the aesthetics of these properties, which will affect the residents living on these properties and will have a substantial impact on the value of these properties.

Further, the suggestion in the Mitigated Neg. Dec. that power lines would blend in with the surrounding development is not accurate. The addition of power lines to the views in the area surrounding the Project would cause substantial visual clutter, and would in fact lead to a significant cumulative impact on the aesthetics of the area. The residential area surrounding the Project should not be subject to any more visual impacts, because any additional impacts will bring the cumulative visual impacts to a significant level. For these reasons, Mr. Kawamoto requests that the CPUC prepare an EIR for this project to address the significant impacts that the Project will have on the aesthetics of the area surrounding the Project, and to consider alternatives that will have a less significant impact on such aesthetics. The EIR should also consider, in detail, the cumulative effects of the Project, and, in particular the cumulative aesthetic impacts.

2-1

**Comment Set 2, cont.**

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*The CPUC should give more consideration to the impacts of exposure to electric and magnetic fields based on the proximity of the residential properties to the proposed power lines*

**2-2**

The Mitigated Neg. Dec. acknowledges that exposure to the electric and magnetic fields ("EMF") raises concerns about potential health-related consequences. Because there are currently no health-based standards for long-term exposure to EMF in the United States, the Mitigated Neg. Dec. finds that the impact associated with EMF is less than significant. There is, however, the potential that EMF could have health related consequences to persons that are exposed to EMF on a regular basis. The Mitigated Neg. Dec. fails to discuss any of the potential health concerns related to EMF, except to acknowledge that such health concerns do exist. Given the fact that there are residential properties located in the immediate vicinity of the proposed power lines, there is a possibility that significant health related consequences could be caused by the Project. The CPUC should address these potential impacts more thoroughly, and should consider alternatives to the Project that will not have such a profound potential impact on nearby residents.

*The CPUC should consider the noise impacts of the Project.*

As noted above, the proposed 60kV transmission lines will be within a few feet of houses owned by Mr. Kawamoto and occupied by his lessees. Electric lines of this capacity are known to generate humming and crackling noises that can be very disturbing to persons living and working nearby. The environmental document should consider the magnitude of this impact as well as any alternatives or mitigation measures which might eliminate or reduce such impact.

**2-3**

*The CPUC should consider undergrounding the power lines in order to comply with the requirements of the City of Rocklin General Plan*

The City of Rocklin requested that the power line be undergrounded if such undergrounding is feasible. Had Mr. Kawamoto been made aware of the proposed Project in a timely manner, he would have joined the City in that request. As stated in the Mitigated Neg. Dec., the City of Rocklin General Plan's Public Services and Facilities Policy 17 encourages the undergrounding of utility lines, where feasible. (Mitigated Neg. Dec. p. B-79.) PG&E incorporated specific design provisions in the Project, but did not consider undergrounding of the power lines, and did not find that undergrounding of the power lines would be infeasible. The City's policy is further evidence of the significant impact that will be caused by the placement of additional overhead transmission lines within the City boundaries. The CPUC should consider the impacts caused by the Project's failure to comply with the City of Rocklin General Plan, and should consider

**2-4**

## Comment Set 2, *cont.*

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undergrounding the power lines based on the fact that undergrounding is clearly preferred by the City. The Mitigated Neg. Dec. does not include a finding that undergrounding is infeasible, and it therefore should be considered as a potentially environmentally superior alternative as part of the environmental analysis of this Project.

2-4

In addition to the significant impacts discussed above, the Mitigated Neg. Dec. notes potentially significant impacts related to air quality, biological resources and hazardous materials. Given the fact that there are a large number of potentially significant environmental impacts that must be considered, the CPUC should consider alternatives to the Project. The Mitigated Neg. Dec. includes analysis that is very similar to the level of analysis that would be set forth in an EIR, but does not include an analysis of alternatives to the Project. PG&E is required to employ substantial mitigation as part of the Project, and it would be worthwhile for both the applicant and those impacted by the Project to consider alternatives that may have a less significant impact on the environment.

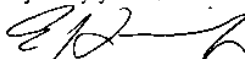
2-5

As noted briefly above, the CPUC failed to provide Mr. Kawamoto or any of his representatives with notice of the proposed adoption of the Mitigated Neg. Dec. Public Utilities Commission Rules of Practice and Procedure section 17.1(f)(1)(A) states that "[n]otice of the preparation of a Negative Declaration shall be given by direct mail to . . . owners of land, under, or on which the project may be located, and owners of land adjacent thereto." Mr. Kawamoto is an owner of land adjacent to the Project, but did not receive direct notice of the preparation of the Mitigated Neg. Dec. Mr. Kawamoto's awareness of the Project came through informal means well after the early public discussions of the Project. This has limited his ability to review informational materials, investigate the Project and prepare comments. Given that Mr. Kawamoto, who owns a substantial number of properties in the Project area, received no direct notice of the Mitigated Neg. Dec., it is likely that other property owners have not been notified. The Mitigated Neg. Dec. is therefore not adequate because the CPUC failed to comply with its Rules of Practice and Procedure.

2-6

For all of the foregoing reasons, Mr. Kawamoto requests that the CPUC not adopt the Mitigated Neg. Dec., and that the CPUC conduct further environmental review before considering approval of the Project.

Very truly yours,



Edward J. Quinn, Jr.

EJQ:jjh

cc: Carol Asai-Sato

**Comment Set 3**

**Kent Dazey  
5616 Delano Way  
Rocklin, CA 95677**

Hand Delivered to Aspen Environmental Group, Sacramento Office per Approval from CPUC

November 15, 2001

Nicolas Procos, CPUC  
C/o Aspen Environmental Group  
235 Montgomery Street, Suite 800  
San Francisco, CA 94104

Re: Atlantic-Del Mar Reinforcement Project

Dear Mr. Procos,

Enclosed are my written comments on the Draft Mitigated Negative Declaration and Initial Study regarding the Atlantic-Del Mar Reinforcement Project. This project has caused considerable objection from the City of Rocklin, the City of Roseville, the Rocklin Chamber of Commerce, the Rocklin Historical Society, and hundreds of Rocklin residents who have become alarmed about the threat to their community that this project presents. I am equally alarmed with this project, and my comments are summarized below, starting with the front of the Document, and working through to the back.

<u>Page #</u>	<u>Comment</u>
Notice	As a resident of Rocklin and a citizen of the State of California, I object to the brief time period allowed for comment. I take issue that the residents of Rocklin were not fully notified about the Informational Meeting or given a reasonable period after the Informational Meeting to prepare their comments. Providing written notice of the meeting only to residents within 150 feet of the project was not a comprehensive notice to all affected parties. Residents throughout Rocklin were upset that they were not notified of this proposal. This short notice period and failure to invite a greater percentage of the community was, in a sense, a breach of the public's trust.
Mitigation Letter from Kevin Coughlin, Manager, Analysis Branch, Energy Division, CPUC	The "Purpose and Need" of this project is to serve the Del Mar area, which includes the City of Rocklin and south Placer County. I question

**3-1**

**3-2**

**Comment Set 3, cont.**

whether this need is truly based on extra demand from the downtown area of Rocklin, whose growth has been minimal, or if the real demand appears in North Stanford Ranch and Lincoln. Why isn't another PG&E substation being built on and adjacent to undeveloped land to accommodate this new growth in those geographic sectors. There is a new substation on Fiddymet Road near Baseline. Why can't a similar substation be built in the Lincoln area that would not disturb existing developments? As I understand this process, you do not have to answer this question because this is a comment period on only the Negative Declaration, but I challenge you to answer the question anyway. Also, with regard to the project, I want to understand how much power capacity can be handled by the Del Mar Substation in terms of voltage and equipment and land space needs. I also want to know specifically how the distribution lines extending out of the Del Mar Substation will be handled. Will these distribution lines be undergrounded in compliance with the City of Rocklin's ordinance for undergrounding power lines?

**3-2**

Secondly, the letter from Kevin Coughlin makes the statement that "the Commission finds that the project will not have a significant impact on the environment." I question Mr Coughlin's authority to make such a statement prior to the conclusion of the public comment period and ultimate decision by the CPUC. Has the Commission voted to approve this Draft Mitigated Report? If not, how can Mr. Coughlin make the assertion that this project is already approved? This is a misleading statement that prejudices the due process rights of residents during their public comment period. It serves to put them on notice that their comments will have no meaning because "the Commission" has already decided on the project. This I see as a due process error.

**3-3**

B-2 The Project Area Land Use table has measurements identified in milepost/substation categories. This table should be made into a visual with an updated map so that residents can clearly determine its completeness and identify these landmarks easily in order to properly comment on them during this public review process. Maps with the numbered poles should also indicate the milepost measurements to assist readers in evaluating the Plan. I question the descriptions in the first .75 miles of this route. Please provide a complete explanation of the Power Line, Overpass and Open Space described in this route from the Atlantic Substation. I particularly want to know the planned route along the new Creekside Ridge Drive, and how and where the route will turn east and proceed to the railroad tracks?

**3-4**

**3-5**

**3-6**

B - 4 Regarding Figure B-4, this map is based on an outdated, U.S. Geologic Survey map from the late 60's or 70's. It does not show the development in which I live, and as such, minimizes the impact of this project to the residents most affected by this project. This is false and misleading.

**3-7**

**Comment Set 3, cont.**

B-5 The Power Line route is a concern to me in most if not all aspects as described in this report. However, of specific importance to mention here is that once Pacific Taylor is widened, the elevated line from south of highway 65 to north of Sunset will carry 115Kv, which then is reallocated by diverting 60Kv back in the existing distribution system, while the remaining 60Kv proceeds north to just short of Farron on the new poles, where it crosses eastward over the railroad tracks and then crosses Farron. I have a distinct complaint that this routing does not make sense from a business or aesthetic viewpoint. If the power lines were to cross east over the railroad tracks south of the Tank Farm, then less distribution wire would be needed to re-attach to the local distribution system north of Sunset (i.e. less wire is needed to extend from a pole east of the tracks rather than west of the tracks just north of Sunset). This would mitigate at least some of the concerns from residents along Willard Ave and throughout the Oakridge Development. This path would be at the rear of the commercial parcel, which is for sale at the current time. This parcel should not be given additional advantage of an unencumbered property at the expense of residents who have lived in their homes along Willard for over twelve years.

**3-8**

B-8 Power Line Construction – Please explain to me how the Base Plate and Foundation Bolt Construction, and the Pile Driving Construction sections, which are described in such minute detail, how could they fail to mention the interstate jet fuel pipeline utilized by Beale and Fallon AFB in California and Nevada along this same railroad corridor? . Would not it be more critical to state for the record in the Construction process that the engineers would survey the subsurface area prior to worrying about its pole engineering design criteria? While perhaps implied in this process, and fortunately covered in the mitigating procedures, specifically APM 15-2, this is another example of the oversights that produce substantial flaw in this Project report. Construction along a jet fuel pipeline is a serious proposition, and I would like to specifically know if PG&E has consulted with Union Pacific, Kinder Morgan Energy Partners or the Department of Defense about this project. Our inquiries with Union Pacific indicated that this was a surprise to the railroad. Have all impacted parties in this project been notified, and are all of them in agreement with its terms and conditions?

**3-9**

B-10 Project Construction Schedule – It appears that two primary time constraints exist with the project. The Atlantic substation needs to be retrofitted before May 15, 2002, and the power pole construction needs to begin by February 2, 2002 in order to prevent interruption of the breeding habits of multiple animal and bird species. What is the proposed schedule internally at the CPUC for the ALJ to make her decision, and what is the specific time period for the subsequent protest opportunity by the public.

**3-10**



**Comment Set 3, cont.**

	<p>How do all of these time periods fit within the construction timeframe as established in the plan. What are the contingency plans for revised timetables?</p>	<b>3-10</b>
	<p>Regarding EMF, this is a potentially dangerous component to the power industry. While a difficult argument to protest, it is much like the tobacco industry. Only until a generation or two have passed will we know the true effects of EMF. If the power industry is wrong about its assumption, the litigation will ensue. The financial experts are probably reserving money for potential contingent liabilities like the tobacco industry did, but for me, I regret that these reserves are coming out of my rates. This is personal commentary, but this seems unfair.</p>	<b>3-11</b>
B-11	<p>Applicant Proposed Measures – Aesthetics – How can the City of Rocklin and PG&amp;E decide independently that the aesthetics of Rocklin will not be impaired if PG&amp;E provides landscaping at the base of the poles, non-reflective wires and gray, self-weathering poles. This is inconsistent with their protest to underground the power lines from Sunset to Midas, and it is not consistent with the opinions of the residents of the City of Rocklin. This mitigation is not acceptable from an aesthetic standpoint. Letters of protest, questionnaires and e-mails will attest that this mitigation is not acceptable.</p>	<b>3-12</b>
	<p>Air Quality – Worker Training – I would expect workers to be trained. The construction process to control air quality is well written, but again a critical component was omitted from this section. The Plan should have evaluated the impact of fallen and severed power lines mixing 60 Kv power with the hazardous materials constantly travelling along this railroad corridor. This is the more meaningful air quality issue. For instance, I understand that liquid sulfur, when subject to extreme heat, can cause a very toxic gas that can severely impact a population. I think that a study should be done to evaluate the chemical reaction and resulting gases that would occur if the various hazardous materials were to come into contact with the 60 Kv power running through these power lines. While the routine process is containment of the power within the lines, there is a percentage of time when that power transcends the actual power line and disperses itself in some other manner. It's this scenario that is important to the public.</p>	<b>3-13</b>
	<p>Biological Resources – What happens if the biological monitor exercises his/her authority to stop activities, and cannot find suitable alternatives? Does the project stop. How is this documented. Who do these monitors work for? Has there ever been a case where construction stopped for an extended period because of biological factors? If so, please describe.</p>	<b>3-14</b>

**Comment Set 3, cont.**

Wetlands and Riparian Habitat – Will the power poles be set at a distance of 250 feet from all seasonal wetlands? If so, are any of the planned pole placements in conflict with this requirement. If so, what is being done about it?

**3-15**

Interruption of Breeding and Nesting Activities of Avian Species – What is specifically meant by the contradictory phrases “To the extent possible” and the stipulation that “If avoidance is not possible, a construction free buffer of at least 250 feet around the nest will be maintained to protect breeding birds”? Will PG&E maintain a 250 feet buffer zone if they encounter breeding birds? If construction begins after February 2<sup>nd</sup>, the risk of nests increase, so will the pole placement be reconfigured based on a concurrent study of bird nesting habitats. Who is the CDFG? Can PG&E make sudden changes in its pole configuration during construction as implied by this mitigation? Unless construction of all poles begin prior to any nesting along the site path, all pole placements are subject to change. Is this not correct?

**3-16**

Trimming or Removal of Nest Trees – There is a conflict between mitigation measures here. First, the construction date is set to begin on February 2<sup>nd</sup>, not March 15<sup>th</sup> as shown in this mitigation. Previous sections of this plan already specified that construction should begin by February 2<sup>nd</sup> to avoid breeding season conflicts. When is the construction date to begin?

**3-17**

Potential Loss of VELB Habitat – Where are the two protected elderberry bushes and where are the power pole placements in relation to these two bushes?

**3-18**

Multiple Mitigations – Sanford’s Arrowhead Sagittaria sanfordi plant species, Vernal pool Tadpole shrimp and California Linderiella Fairy Shrimp all seem to exist in the vernal pool area north of Sunset. How does PG&E plan to protect this area when there is not an access road into this area? Secondly, the construction of a tower will not allow for a 250-foot buffer zone in this area. Finally, when Sunset is widened, this tower may need to be moved, which will again lead to a disturbance of this important horticultural and biological preserve. How will these mitigations occur? Shouldn’t the pole placements anticipate the expansion of Sunset, or better yet, the undergrounding of the power lines would allow for this expansion with minimal long-term impact to the environment.

**3-19**

**3-20**

Hazardous Substance Control and Emergency Response Plan – This mitigation deals only with hazardous materials that PG&E might emit during the construction process. What about the emergency response plan necessary if the 60 Kv line triggers a jet fuel explosion at the Tank Farm. What is the emergency response plan in that situation? What would be the dimension of the

**3-21**

### Comment Set 3, *cont.*

explosion if one tank exploded and, likewise, what would be the impact if all the tanks exploded? If this occurred, could the local fire fighters handle the situation, or would they need additional resources, and if so, what additional resources would be needed?

3-21

Do not place poles directly over landfill waste – Why doesn't this section also read, do not put power lines within the falling distance of the electrical transformer of a jet fuel storage depot? This scenario need to have its own mitigation, seriously.

Spill Prevention, Countermeasure, and Control Systems – Again, this mitigation deals only with the focus of a spill caused by PG&E. What about a spill from the jet fuel storage facility as occurred in 1981 (see Exhibit 1 - Sacramento Bee article). This is probably where the MTBE contamination occurred east of the Tank Farms in the first place. In this case, the power lines are a compounding factor in a disastrous situation. What mitigating measure does PG&E propose if there is a significant leak from the jet fuel depot or its pipeline? What if the power line falls from their elevated towers. What happens if they strike the railroad lines and conduct electricity for miles. What happens if the downed power lines are struck by a train? What happens if the power lines strike the jet fuel tanks? What happens if a train derailment knocks over a pole and projects it into a fuel tank and it explodes. What happens if thousands of Rocklin resident are immediately killed as a result of contributory negligence on the part of PG&E and the CPUC? Is the CPUC aware of the nearly tragic gasoline spill at the Tank Farms on 6/21/81

3-22

B-21 Agencies Other Than the CPUC Whose Approval May Be Required – In addition to these agencies, why did CPUC not indicate that approval was needed from the Union Pacific Railroad and potentially the Department of Defense since this fuel depot supplies jet fuel to US Air Bases? Why is the existence of this jet fuel compound continually overlooked in this plan?

3-23

B-22 I am troubled by the conclusion drawn by Mr Coughlin that “although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made or agreed to by the applicant.” The applicant has not even heard from the public, and the attorneys protesting this plan, so how can a conclusion be drawn prior to knowing all the facts? I was aware that until the CPUC Commissioners vote to approve this plan, it is still subject to revisions, protest, hearings and disapproval. How can Mr. Coughlin make such a determination before this process has been concluded?

3-24

Note: Based on these challenges to the mitigated Applicant Proposed Measures, I will expect a detailed response on each of the identified areas.

## Comment Set 3, *cont.*

With regard to the balance of my comments on the Project, I will present my thoughts in a more general sense according to key environmental factors.

### Aesthetics

I find that the "Less than Significant" determination regarding the impact on Rocklin's visual character is a substantial mistake. See Exhibit 2 – Current and Proposed view of the "Welcome to Rocklin" stretch along Pacific Taylor. This is a material impact on the visual character of Rocklin. People in Rocklin spend most of their time in the car either driving along Pacific Taylor, or on cross streets that will pass under these 75 foot high towers. This will make an immediate and permanent impact on downtown Rocklin, and it will set downtown apart from Stanford Ranch to the West and the College area to the East. These towers would create visual obstructions along an already dangerous railroad path, and they would create an industrial, utility corridor type atmosphere that would contradict the restoration efforts that are underway in downtown Rocklin. In the early 90's, it was a very welcome relief that trees were planted along Pacific Taylor, and the Welcome to Rocklin sign was erected. This was a substantial beautification effort that was followed by the renovation of the streets in downtown Rocklin, and along 1<sup>st</sup> through 5<sup>th</sup> streets. Currently, renovation of the median along Sunset is being completed to the delight of Rocklin residents. Now, this power line plan threatens Rocklin's visual character, and that is a violation of CEQA and this is not acceptable.

It is questionable to me how PG&E and the CPUC can determine that Rocklin's vista would not be significantly impacted when the full visual effect, as identified by the plan's maps and visual simulations, is seriously flawed. Having informed Nicolas Procos, representing CPUC, and consultants from Aspen Environmental Group, that the map used as the Photographic Viewpoint Map in the Plan is based on a geologic survey map that, we thought was initially only 15 years old. I was shocked to see that they appeared unaware of this fact. How could a plan that has been developed for several years by a significant public utility, and reviewed by an agency of the State of California, not realize that their site description was at least 15 years old! This map caused me, and countless others in the community undue stress, and it undermined any sense of credibility that the plan might have. The response of the people from Aspen Environmental Group was that the map couldn't be trusted but that the written words are accurate. This is not acceptable to me. If someone is going to potentially endanger my families well being and literally cause me to lose from five to possibly twenty thousand dollars out of my pocket just because they have the legal jurisdiction to lower my property values to meet their corporate needs, I will need to make sure that every step they take complies with accuracy and due process. This Mitigated Negative Declaration has to either completely stand on its own merits as proposed to the public on October 25, 2001, or it needs to be rejected in whole by the ALJ and done over. I contend that the Photographic Viewpoint Map, and all other maps in this document, should reasonably identify buildings and developments that have existed for at least two years. If not, they should be rejected, and replaced by current maps. In just a few days, community members compiled an aerial map of the proposed route using Map Quest (Exhibit 3 (poster) and Exhibit 4 (8 ½ X

3-25

**Comment Set 3, cont.**

**3-25**

11)). I contend that CPUC should hold PG&E responsible for producing a map at least as current as was produced by the Rocklin community. Short of this response, it could be assumed that expediency on the part of PG&E led to the use of the outdated map and the outcome was that the scope of the project was minimized. If a Commissioner of the CPUC were to vote on this project and was unaware that these maps were outdated, and were not familiar with the Rocklin area, they would be relying on the information provided, both in writing and visually, that would be potentially misleading. During the pre-hearing conference, the topic of parcels within 150 feet of the project was discussed. PG&E initially said that only a few parcels would be impacted, but that they were not sure. Their maps clearly did not show the impacted parcels. When asked by the ALJ to prepare an exact study of the parcels, they identified 300 properties within 150 feet of the proposed project site. If the ALJ had not raised this question, any reader of this report would easily be misled. Another case in point. The written word did discuss the fact that homes along Willard might have their views impaired from their backyard. Nowhere in the report, except the aerial photograph showing the vegetation plan, was the development that included Willard ever shown. Therefore, all the other homes that were not mentioned in the written words were overlooked with regard to their visual and property value impact to the reader. What's worse, this map, which was later determined by Terry Richardson, Planning Director for the City of Rocklin, was much more serious in adequacy. It was basically a geologic survey map from the late 60's and early 70's. This is incredible! If a surgeon used procedures from this time period on his patients, he would be sued and sanctioned by his peers. Where is the accountability of the CPUC on this problem? Is this routine operating procedure to use outdated maps, especially in developing, urban areas where new roads, houses and commercial buildings are sprouting up daily. Placer County is recognized as one of the fastest growing communities in the State of California? Why is this not recognized by the CPUC? Can the CPUC make unilateral decisions about what is significant and not significant based on insufficient information? Shouldn't the CPUC be held to the same level of integrity as the citizens who have to live with the results of their decisions? Shouldn't the CPUC be accountable for reflecting current reality in ALL aspects of their reports, rather than relying on the written and conveniently discarding the visual aspect of their reports. The fact that an honest footnote was not made present on each and every map that used this same outdated template is to me at best, negligent, and at worst, fraudulent since the information derived therefrom is critical to the decision maker who is otherwise uninformed. Having had footnotes left off this map, I have the potential to be harmed in a legal sense for lack of due process.

Regarding the CPUC visual simulations, I find that they minimize the visual impact of this project substantially. By the angle of the picture in Figure I-2, the new pole in the background is situated so that it appears less high than the closer existing pole which is roughly one half its height. While technically it is probably accurate, its appearance is misleading. Figure I-3 is very misleading, it is a sort of shadow pole that is very hard to find. Figure I-4 has the top of the pole conveniently placed in a tree. Figure I-5 is the only fair depiction I saw. Please review the simulations prepared by the community as being more representative of the visual impact of the project (Exhibit 2, 5 & 6).

**Comment Set 3, cont.**

Concerning the CPUC conclusion that the power lines will be obstructed by commercial buildings, railroad tracts and vegetation, this is not correct. People want to live by the railroad tracks because they have an affinity for the railroad and the historical significance derived from it. The existing overhead power lines, and the rail road equipment, all add to the visual character of the historical railroad corridor. Overhead, 60Kv power lines would violate this character. Placing a power pole and power lines directly over the planned train depot rips at the heart of Rocklin’s downtown restoration. This is not consistent with Rocklin’s character and general plan for-development. Planting flowers at the base of these poles is hardly a mitigating measure to prevent people from noticing these power lines over their heads each and every day. This is wrong.

**3-25**

Land Use

The City of Rocklin has an ordinance that all new development should have their utilities put underground. Existing overhead utilities are slated to be put underground. If these ordinances are on the books, why should PG&E be allowed to defy this ordinance and erect overhead transmission lines. Despite the arguments that PG&E has a superior eminent domain regarding transmission lines, they should be held accountable to act in a socially responsible manner that integrates with existing land use policies rather than insisting on a solution that it economically advantageous to PG&E and disadvantageous to Rocklin.

**3-26**

Historical Value

Is the CPUC aware that Pacific Taylor is apart of the original Lincoln Highway, or otherwise known as US 40, the first coast to coast highway in the United States. This highway is celebrated by many historians, and is a growing source of pride for many California cities including Dixon, Davis and Auburn. Perhaps Rocklin will begin to expand its railroad heritage by publicly acknowledging the Lincoln Highway. Enclosed in Exhibit 7 is a recent news broadcast from Sacramento’s KOVR 13, which features this highway and its historical significance. This Greater Sacramento recognition reveals its growing popularity and value in terms of historical significance. Having high voltage power lines run through the entire width of Rocklin along this key, historical highway would be inconsistent with the heritage that Rocklin is seeking to develop in its downtown sector.

**3-27**

Also key the redevelopment of downtown is the development of a new train station with the intent of building on the historic, railroad based downtown that is so important to Rocklin. Note the enthusiasm of Rocklin residents, and their adherence with historic costumes when they celebrate the Amtrak Capitol Train to Rocklin (see Exhibit 8). This enthusiasm is the force driving the new train depot, and the revival of the old historic downtown Rocklin that is intertwined with the railroad. The plans for the new train depot are shown in Exhibit 9. Again, elevated, high voltage power lines are inconsistent with the décor of the redeveloping downtown corridor. Power lines would make downtown look more like a utility corridor than a historical city with roots in the railroad.

**3-28**

**Comment Set 3, cont.**

**3-29**

Property Value Issues

Originally, PG&E, in their application to the CPUC, stated that only one property would be directly effected by their power line project. While their application in itself is not the subject of this comment, it goes to the heart of their regard for the impact on property values. Apparently the CPUC agrees that there will be less than significant impact on property values. This is an unsettling conclusion that strikes at the heart of the CPUC's real concern for the public's best interest in these matters. Perhaps additional blame needs to be pointed at the CEQA law that protects birds and wildlife at, what sometimes appears as the almost complete expense, of people. Regardless of this sad state of affairs, the ALJ forced PG&E to identify all properties within 150 feet of the project. They complied, and our review of their report indicates that they did an accurate job. So, after our own study to validate the PG&E study, we are in agreement with PG&E on these property specifics, however, we can now begin to talk about property values. Enclosed is a list of the respective properties, their assessed values and their current market values (see Exhibit 10). The value amounts are as shown below:

**PROPERTY WITHIN 150 FEET OF PROJECT**

<u>Category</u>	<u>Amount</u>	<u>Potential Value Loss &lt;10%&gt;</u>
Assessed Value	\$46,013,753	\$4,601,753
Market Value	\$59,325,548	\$5,932,555

**ESTIMATED PROPERTY WITHIN 1,000 FEET OF PROJECT (4 x value)**

<u>Category</u>	<u>Amount</u>	<u>Potential Value Loss &lt;10%&gt;</u>
Assessed Value	\$184,067,010	\$16,406,700
Market Value	\$237,302,190	\$23,730,219

Give or take five percentage points or so, the estimate property loss shown above is significant. Based on a 10% deflator, the loss in assessed values could be as much as \$5 - \$16 million, and from \$6 - \$24 million in market value. Even if these estimates were cut in half, they are still significant amounts to be absorbed by the downtown property holders. Are these property value losses to be born by the residents of downtown Rocklin in order for PG&E to benefit from the lowest cost alternative route between the Atlantic and the Del Mar substations. This represents actual dollars out of our pockets that we need to absorb while, at the same time, we have to pay for the construction of the power lines that will devalue our property. This is double jeopardy in a legal sense. We pay twice for PG&E's determination that this project is less than significant on People and Housing. They know it will cost homeowners a considerable amount of money, and they will most likely compensate those within 150 feet, but they leave an economic travesty for those beyond the 150 feet range that also have their property impacted. Buyers just do not want to live by power lines. See Exhibit 6 for an illustration that will occur in my development off Third Avenue. This is the street called Willard that is mentioned in the

**Comment Set 3, cont.**

plan as having some impact to their property which was again defined as less than significant. This is not minimal. These people will lose their property value, and they lose a great deal of their quality of life as well. It's just that simple. Unless the price of the home is low enough, the buyers will not purchase these homes, and the people living inside will have to live with the buzzing noise, the fear of EMF and collapsing poles, sparking wires, downed wires, brush fires and the like. This conclusion by PG&E that this is "Less than Significant" is not accurate. PG&E should compensate all homeowners impacted in any way by those power lines, or put them underground where fewer, if anyone, will be impacted.

**3-29**

City Division

This topic is very real to downtown Rocklin. Long the stepchild to Stanford Ranch and the College District, the downtown area has been in a progressive renovation. Starting with the upgrading of Pacific Taylor with the mile or so of new trees and the new "Welcome to Rocklin" sign, the downtown area has seen housing renovations, the restoration of the streets in downtown, the application of decorative tile. Expanded streets, sidewalks, drinking fountains, benches and the like in the downtown sector. Also occurring is the development of the median on Sunset Avenue. These collective enhancements to downtown have been efforts to bring downtown up to par with Stanford Ranch and the College District. The power lines would most certainly divide Rocklin into three parts, Stanford Ranch, the College District and Downtown. The downtown sector would again revert to a lower status, new business would not be attracted to this deteriorating utility corridor, and residents of Rocklin would resent driving under the power lines, so they would avoid downtown unless they had to travel the inner city roads. Already most Stanford Ranch residents come and go on Highway 65, and this addition of power lines would further divide the city. The people of downtown Rocklin have almost always received the short end of the stick when it comes to parity with street repair, repaving, landscaping, median developments and the like. They feel second best to their Stanford Ranch neighbors. Now they are fighting for their dignity against these power lines, and they are once again being discriminated against. PG&E would not likely dare put these lines over Stanford Ranch because of the potential protest that might ensue, even though the power from these lines will be used to fuel the growth in north Stanford Ranch and Lincoln. This is a city dividing issue. The power is needed in the prosperous, growing area, but the burden of the power lines; the loss of aesthetics, property values and historical significance is being borne by the downtown folks. This is unfair, and this strikes directly at the CEQA laws forbidding a project from physically dividing a city. This proposal physically divides Rocklin, and it morally divides Rocklin as well. It feels very much like the people of downtown are being sold-out to benefit growing part of Rocklin. This is not fair. Both PG&E and the Cities of Rocklin and Lincoln should arrive at a financing plan to support the cost of undergrounding the power lines. PG&E's only protest about undergrounding the lines is based on cost. This cost should be borne by all Rocklin citizens, not just the unlucky ones living in downtown. This is dividing a town that is usually together on most issues. This could lead to serious problems for this area, and this comes at a time when the renovations are picking up speed. Should PG&E, and the CPUC, take an action that would divide Rocklin? See Exhibits 11, which are

**3-30**



## Comment Set 3, *cont.*

articles from the Placer Herald that recognize the community efforts to resist the overhead power lines and support the underground option. These articles speak to the voices of the people living in downtown Rocklin. They need to be heard. I request CPUC to define in definitive terms what they view as criteria qualifying for the impact protected by CEQA as "Division of a City by Power Lines." My perception of division of a city definitely applies. I have lived here for twelve years. I know the environment. I know this is an issue.

**3-30**

### Safety

Aside from EMF, which I will not bother commenting on except to say that mental, if not physical illness can result from its presence, this will likely become an issue in the next several decades. Many of the industry protections in place now will likely have yielded to various individual and class action lawsuits, but this is something in the future. With regard to present safety issues, I focus my attention on the safety issues involving the Jet Fuel Facility, the vulnerability of the power poles to collapse onto road ways, houses or other locations, and the danger of having high voltage lines that might spark, that might fall from their elevated tower, or that might discharge an errant bolt of electricity that can have cataclysmic consequences. As a thorough explanation of my concern regarding safety, I am going to include my letter to Tim Leslie in this section to express my concerns about safety with this project, as follows:

**3-31**

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## Comment Set 3, *cont.*

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**Kent & Anne Dazey  
5616 Delano Way  
Rocklin, CA 95677**

November 15, 2001

Tim Leslie  
CA State Assembly District 4 Representative  
3300 Douglas Blvd. #430  
Roseville, CA 95661

RE: CPUC Atlantic-Del Mar Reinforcement Project

Dear Representative Leslie,

It is with extreme concern that I write this letter to you concerning PG&E's Atlantic-Del Mar Reinforcement Project to extend four miles of 60 Kv high voltage overhead power lines through Rocklin, supported by some 30 power poles ranging from 75 to 110 in vertical feet. Aside from the project's impact on the aesthetic, historic, land use, property value and city division issues (the lines will cut through the heart of downtown, separating downtown from Stanford Ranch and the College District), there is still a bigger issue that looms over this project. It is the issue of safety. In my efforts to identify all the potential arguments against the power lines to be included in my protest during the comment period, I, along with other concerned citizens, have discovered an unsettling fact about our city. We learned that the Tank Farms in Rocklin are, among other things, a Jet Fuel Storage and Pipeline Facility, used to supply jet fuel for Beale and Fallon Air Force Bases in California and Nevada. This knowledge of a jet fuel storage facility substantially threatens our state of minds, and, in fact, could threaten our very existence in this post "September 11<sup>th</sup>" world. I need to share with you my concerns about the tank farm, and the compounding hazardous effect that might occur by adding elevated high voltage power lines in that already dangerous environment.

On Sunday, June 21, 1981, "a combination of human error and equipment failure" (Sacramento Bee, June 22, 1981 – Attachment A) lead to the overflowing of an estimated 30,000 gallons of leaded auto gasoline into a protective dike where the liquid was luckily maintained, but the gasoline vapors caused imminent fear of ignition. "Mayor Clarke Dominquez declared a local state of emergency, which put the National Guard and other federal agencies with special military equipment on alert" Fortunately the spill was contained with thick foam to prevent an explosion. The article ends with the quote "...the spill was similar to one which sparked an explosion and fire in Stockton a year

## Comment Set 3, *cont.*

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ago that sent flames shooting more than 400 feet into the air.” The neighborhood was cordoned off, the railroad was shut down, and plans were made to evacuate 1,000 area residents. The gasoline spill was “only a few hundred yards” from the rail line. Residents still echo their concerns about that tragic Sunday morning. I spoke with three people who were involved, one who was diverted on her way to church, another was the actual police dispatcher who took the first call that led to the enactment of the emergency plan, and finally the last was a young fire fighter who years later, as a senior fire fighter in Rocklin, understands how dangerous that situation truly was. This is very important Rocklin history that we need to understand.

Bringing this threat to the present day, the mental image of seeing both World Trade Center buildings destroyed by explosions of jet fuel, I am very concerned that the Tank Farm is more hazardous than I ever imagined. Seeing the awful damage caused by the planes on 9/11 filled with jet fuel, I now wonder about the destruction that could be caused if the Tank Farm were ever, God forbid, to explode. There is probably well over 500 times the amount of jet fuel stored at the Rocklin Tank Farms than was carried on both planes that struck the World Trade Center. This fact frightens me. While I am aware that the facility is well managed, and that it contains safety precautions, including 4,000 gallons of subsurface and overhead foam resources, the fact remains that a catastrophe of epic proportions could in fact take place at this location. It could easily outstrip the ability of the available fire fighting resources in the area in the case of a major explosion and fire. Adding to this problem is the fact that with the closure of Mather and McClellan Air Force Bases, the back-up supply of Jet fuel foam would need to come from Travis, except for some amount (750 pounds) from the Rocklin Fire Department or some additional amounts that could perhaps be made available from another Tank Farm in Sacramento. This extended response time makes this situation more dangerous.

Added to the danger of the jet fuel storage are the dangers in the environment surrounding the depot involving the railroad and the roads crossing the tracks in the vicinity. There has been an increased amount of train traffic travelling on these train tracks carrying very hazardous materials, including chemical and even nuclear materials. These alone are dangerous matters, but when cross roads are added to the situation, they compound the situation. Alarming, the road leading over the tracks and into the Kinder Morgan Plant is unmanned. This was the site of a Train collision with a truck on July 25, 1996, at 12.50 P.M. as shown in Attachment B – HIGHWAY-RAIL GRADE CROSSING ACCIDENT/INCIDENT REPORT. This accident brings home the fact that this is very dangerous environment. Additionally, the U.S. Department of Transportation – AAR Crossing Inventory Information as of 11/9/01 indicates that for this particular crossing which was the site of the accident in 1996 (crossing number 750563W) as shown in Attachment C, the warning devices at this intersection are all marked 0, no or none. This is additional compounding problem, especially since it is sited at the Private Tank Farm as referenced in the accident report. This also contrasts sharply with the AAR Crossing Report for the next major crossing to the north, specifically Rocklin Road. At this intersection, as shown in Attachment D, the normal safety measures are in place.

## Comment Set 3, *cont.*

This contract clearly indicates that this intersection at the Tank Farms is dangerous for multiple reasons. This is a strategic, U.S. military supply pipeline installation that is sited along a dangerous railroad corridor. This needs consideration.

Regarding the strategic significance of the Tank Farm, it is surprising to me, and others in the community, why this facility was not put under military protection after the September 11<sup>th</sup> tragedy, given the nature of its military importance and safety hazard. Sadly, the opposite result seemed to be present. Thinking this would be a secure facility, but curious anyway, I drove onto its property. A guard dog sat on the ground, barking at my car. That was the extent of the security I saw. After waiting in my car for ten minutes or so, a maintenance man came over to my car and proceeded to answer my questions about the Tank Farm. This was unsettling. How could a jet fuel depot for the US Air Force not be a secured facility. What am I missing here? Why doesn't the community know what is in these towers? Their lives are potentially threatened because this could be a strategic target, especially in this terrorist climate. Is this potentially a Department of Defense issue, or is this under State of California jurisdiction?

So, we have a very dangerous jet fuel storage facility in Rocklin, servicing military fuel needs with minimal security coverage, located in a dangerous railroad environment with clear safety issues. This alone is an issue all in of itself. Now we have a PG&E plan to compound this danger even more by erecting high voltage power lines in this same dangerous corridor! What's worse, this Jet Fuel Storage Facility was not even mentioned in the Atlantic-Del Mar Reinforcement Project report from what I could see, except for references in the mitigation measures to avoid the "pipeline" while erecting the power poles.. It's like the storage facility doesn't exist. There are no comments in the Mitigation Implementation and Monitoring Plan to accommodate for the Jet Fuel Facility. At a minimum, in erecting the 30 or so vertical towers, wouldn't the plan need to mention their proximity to the storage facility? The plan went into painstaking detail about the 7-day curing process for the concrete, but it didn't even mention the risk presented by these 75-foot towers on the storage facility. What am I missing? This is a clear and present danger to the safety of people in Rocklin, but the plan didn't cover it. It talked more about vernal pools and elderberry bushes. In my view, the plan should have discussed the existence of this facility and the danger posed by power lines themselves. Electrical sparks are occasionally emitted from these lines, in wind storms, these lines have been known to fall from the elevated towers, often from multiple consecutive towers, resulting in a danger to the railroad and the Tank Farms. The poles supporting the high voltage lines are themselves vulnerable. The poles power poles could be knocked over by a train/vehicle collision or a train derailment where the pole may be struck in such a fashion as to fall onto the Tank Farm. I would anticipate that PG&E would need to verify with its reinsurance carrier that they are willing to underwrite this increased exposure to class action lawsuits in case of injury or death, caused in part by these power lines and poles.

The Atlantic-Del Mar Reinforcement Project concluded that the impact of this project was "Less than Significant." I clearly disagree. Looking at the map showing the Proposed Project and Pole Locations (see Attachment E –Proposed Project and Pole

## Comment Set 3, *cont.*

Locations) the new poles sited just south of Sunset Ave, which is not defined described in writing on this map, but is to the left of the word "Union" for Union Pacific Railroad, this is the site immediately east of the Tank Farm which is also not described on this map. In fact, this Proposed Project and Pole Location Map is apparently based on this visual depiction shown in the Plan's Photographic Viewpoint Map, which is basically a 30 year old geologic survey map that was used to document the Rocklin area (see Attachment F). While this map identifies some marks that could indicate the existence of the Tank Farm prior to its expansion, it does not explicitly identify the Tank Farm, nor does it represent its expansion, nor does it show many residential, commercial and government building that currently exist in Rocklin today, including town hall, Granite Drive, Stanford Ranch or the development in which I live north of Sunset on 3<sup>rd</sup>. In an effort to correct this situation and generate maps that were more up-to-date, community members accessed satellite photographs from MapQuest and assembled an aerial view of the proposed route, shown in Attachment G (even with this current technology, these maps were outdated with the construction of Roseville Parkway over I-80, the finalization of the Galleria Mall and the retail and commercial developments in the area, showing the importance of current maps). Aside from this potential minimization caused by the use of these outdated maps, the issue of the Tank Farm remains present. Based on two visual simulations, it is clear to see that the site of the pole adjacent to the Tank Farm appears to be easily within the falling distance of the Tank Farm's electrical transformer. See Attachment G for a visual simulation of this proximity of the tower to the fuel depot from the telescoped, aerial highlight view described as "Trains, Fuel Tanks and High Voltage." If a train derailment occurred at this unmonitored intersection (i.e. 1996 truck incident), the power pole could be propelled from its foundation and caused to fall upon an even more sensitive part of the Tank Farm, including, but not limited to, a tank itself. This could cause the trigger for an explosion that would be catastrophic. Also see Attachment H for a ground-level visual representation of the risk that this 75-foot pole creates in this already dangerous environment. The electrical transformer can be seen in the bottom left hand corner of the picture. It is clearly within the falling distance of the power pole. This risk, while admittedly rare, is not acceptable to me as a resident of Rocklin and a citizen of California.

The California Environmental Quality Act is supposed to protect my family, my neighbors and I from "a significant hazard to the public or the environment through reasonable foreseeable upset and accident, and to regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian" (Section 21000. Legislative Intent - Policy). Admittedly, I have sought ways to protest these power lines for aesthetic and other reasons, but now faced with this knowledge of the seriousness of the hazard presented by the Tank Farms, I am now most concerned about the safety of my family first and foremost. On two separate occasions, I was interviewed by the media, and I was contacted again today by another TV station and downplayed the need for an interview. . On the first interview, I was concerned with aesthetic and property value issues. On the second interview, Sunday, November 11<sup>th</sup>, I deliberately chose to avoid the Tank Farm issue for fear that it would draw adverse attention to an already dangerous situation (see Attachment I - news broadcast videos). Who knows

## Comment Set 3, *cont.*

what terrorist group would be looking at the news? I choose, instead, to address these concerns to you, Representative Doolittle and Administrative Law Judge Michelle Cooke for the sake of confidentiality. My request is that the current Negative Declaration be subject to hearings so that the impacts of the Tank Farm can be thoroughly understood. It's the catastrophic situation that seems the most important to consider, not the routine.

My hope is that the Atlantic-Del Mar Reinforcement Project will ultimately be redirected into an Environmental Impact Report (EIR) for consideration of all other possible routes with detailed study of all the risks involved. My shock, again, in all of this was that the Tank Farm was not even mentioned in this report. There were other gaps in the document as well (30 year old maps, understated visuals, conclusions with which I disagree, etc.) which will be further outlined, but something of this "safety" proportion would seem significant to mention in the Plan. Something that could cause an explosion, perhaps a hundred times bigger, or more, than the World Trade Center, would seem to be worth noting. I would like a complete study to determine the explosive nature of the JP4 fuel stored at the Tank Farm, and a full review of the "safety" contingencies and security of this strategic compound. In this post 9/11 era, this request seems timely and reasonable.

I will be providing my detailed public comments on this subject with my response to the Administrative Law Judge, Michelle Cooke, from the California Public Utilities Commission, but I also wanted to bring your attention to this subject. My question is simple. Is it necessary to add overhead power lines to this already dangerous environment? We need help to draw the line on the safety of the public. Please help us make sense of this effort to transmit power between the Atlantic and Del Mar Sub-Stations without increasing risk to the people in the community. Help us alter the course of this Negative Declaration so that planning can be done to re-route these power lines or put them underground. The decision by Michelle Cooke is expected within weeks, so your timeliness will be greatly appreciated. For your convenience, I have attached an additional copy of the Atlantic-Del Mar Reinforcement Project for your reference (see Attachment J).

Thank you for your time and attention to this matter.

Sincerely,



Kent Dazey

CC: Michelle Cooke, Administrative Law Judge, CPUC  
Nicolas Procos, Project Manager, CPUC

**Comment Set 3, cont.**

**LIST OF ATTACHMENTS TO TIM LESLIE LETTER  
(These “attachments” to the Tim Leslie letter are located at the  
end of this response to the CPUC)**

<b><u>Item</u></b>	<b><u>Contents</u></b>
A	Sacramento Bee Article, 6/21/81, titled “Tank Yard Gas Spill Halts Yards”
B	Tank Farm Train/Truck Accident Incident Report
C	AAR Crossing Inventory Information – Tank Farm Crossing
D	AAR Crossing Inventory Information – Rocklin Road
E	Atlantic-Del Mar Reinforcement Project – Proposed Project and Pole Locations (Figure B-2)
F	Atlantic-Del Mar Reinforcement Project – Photographic Viewpoint Map (Figure I-1)
G	Community provided aerial map of project site (derived from MapQuest)
H	Community provided simulation of tank Farm with and without power lines – ground level view
I	News media broadcasts regarding the Project (KQVR 13 and Fox 40)
J	Atlantic-Del Mar Reinforcement Project Document

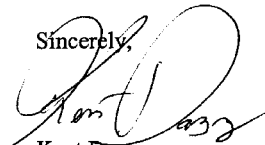
## Comment Set 3, *cont.*

### Summary

Given all the issues listed above, including aesthetic, land use, historic, property value, division of the city and safety issues, it would appear to me that all of these issues, when combined, are significant. The safety issue is by far the most immediate and pressing. It involves our health and right for a safe environment. I ask the CPUC to provide the environmental impact if a catastrophic explosion occurs at the Tank Farm. This seems like a modest request given that our lives are at stake. PG&E apparently does not seem to think that by adding additional components to this already dangerous corridor at the Tank Farm that they are making the Tank Farm more dangerous. I disagree. PG&E still rates this exposure as less than significant. I think my family and I, and all residents of Rocklin, are significant and deserve protection by the law.

I look forward to your response to this letter, and all other comments and letters of protest, prior to any decision on the project in order to assure the residents of Rocklin that their voices were heard, and that their necessary mitigations are made and incorporated into the final decision. I urge the ALJ, Michelle Cooke, to call for hearings and potentially remand this project to an EIR status. This community is not satisfied with this project, with the perception of a lack of due process in the report, and the abrupt manner this project was announced and upon which the timelines for response on this project was made (see Exhibit 11 - Placer Herald Articles). The cumulative impact of this project on the Rocklin community is significant, and the conclusion that it is less than significant is not appropriate. Over 70 people completed a questionnaire on CEQA standards, and nearly all people said the aesthetic, land use, historic, and safety issues produce a cumulative effect, showing that this project is "significant" (see Exhibit 12 - questionnaires and Exhibit 13 - petitions). Public pressure means a great deal, as the media has covered this story in Sacramento (Exhibit 14). The CPUC needs to address all these concerns by the Rocklin community, including our most serious safety concern regarding a catastrophic explosion at the Tank Farm as a result of, or indirectly related to, the addition of these overhead high voltage power lines in this dangerous corridor. This is all of our jobs under CEQA to protect people from upset or accident conditions, and to prevent environmental effects, which will cause adverse effects on human beings either directly or indirectly. This process depends on your continued compliance with the law, just as we have complied with our tight response period. The ball is now in your court. We trust that your response will be to offer a compromise instead of a mandate. This is the substance of good faith.

Sincerely,



Kent Dazey



**Comment Set 3, *cont.***

**EXHIBITS TO THE CPUC RESPONSE LETTER**

- 1) **Sacramento Bee Article – 6/21/81 – Tank Farm Spill**