

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

January 12, 2021

Re: Opposition to SE-PLR-2, Templeton - S. River Route Alternative

Dear Dr. Engels,

I oppose the S. River Route Alternative.

I would like to compare the construction of these power poles along this path to the construction of the Fukajima Nuclear Power plant in Japan. There are similarities, and one significant difference.

The proposed power poles will be designed and constructed to resist the natural forces of nature-gravity, wind, and seismic. Their design will be in compliance with the appropriate building codes, and will have a safety factor. The final design will make them resistant to these forces.

The Fukajima Power plant in Japan was also designed in a similar manner to resist these forces of nature, including tsunamis. As we all know, the final design of the plant may have been earthquake resistant, but it was not, and can never be EARTHQUAKE AND TSUNAMI PROOF.

The designers of the Fukajima Plant needed to be close to the ocean to use the sea water for cooling. They had to accept the potential danger of a tsunami, and try to design their project accordingly. Obviously, they failed.

The proposed power poles along SE-PLR-2 also have a natural geological situation that needs to be addressed. Specifically the Rinconada Fault is 0.4 miles away. Please see the section below from the California Public Utilities Commission, Section 4.7, Geology, Soils, and Seismicity.

Rinconada Fault

The Rinconada Fault is located approximately 0.4 mile southwest of the Proposed Project's 70 kV power line reconductoring segment. The Rinconada Fault also parallels the majority of the Alternative SE-PLR-2 route and crosses the Alternative SE-PLR-2 alignment near the intersection of El Pomar Road and South River Road. Although definitive geologic evidence of Holocene surface rupture has not been found on the Rinconada Fault, it was regarded as an earthquake source for the California Geological Survey (CGS) Probabilistic Seismic Hazards Assessment (PSHA) because of the postulated slip rate of 1 ± 1 mm per year, and the calculated maximum magnitude of 7.3 (Rosenberg et al. 2009). Based on the quaternary age of the Rinconada Fault, it is considered potentially active.

These poles will obviously be designed to be seismic resistant, taken into account the fact that a fault is nearby. They will be seismic resistant, but will not be SEISMIC PROOF. No designer can design them to meet such a requirement.

The difference between the pole design in question and the Fukajima plant is that the plant in Japan had to be constructed at the ocean. They didn't have a choice. These poles, on the other hand can be constructed along a different path, which would significantly reduce the possibility of failure.

California Utility Companies are already in jeopardy due to the fires that their equipment caused in Paradise and Kincade, A similar occurrence is likely here if the poles are constructed on top of an active fault.

In summation, Fukajima planners did not have a choice on their location. However, there are alternate locations of these poles. In the unfortunate event of a pole collapse due to a natural event, and subsequent fire, the utility company could certainly be found to be negligent in choosing this path. Structures can be designed to be earthquake resistant, but never designed to be earthquake PROOF. The obvious solution to this situation is to consider alternate routes.

Thank you for this opportunity to present my opinion

