



CITY OF EL PASO DE ROBLES

"The Pass of the Oaks"

OFFICE OF THE
MAYOR

February 19, 2021

VIA MAIL AND EMAIL

Robert Peterson
California Public Utilities Commission
c/o Tom Engels
Horizon Water and Environment
266 Grand Avenue, Suite 110
Oakland, CA 94610
estrellaproject@horizonh20.com

Subject:

City of Paso Robles' Agency Comment on the Draft Environmental Impact Report for the Estrella Substation and Paso Robles Area Reinforcement Project

Dear Mr. Peterson:

The City of El Paso de Robles (City) has reviewed the California Public Utilities Commission's (CPUC) draft Environmental Impact Report (EIR) for the Estrella Substation and Paso Robles Area Reinforcement Project proposed by NextEra Energy Transmission West, LLC and Pacific Gas and Electric Company (Project). We appreciate the opportunity to comment on the proposed Project.

The City is located within the scenic rolling hills and vineyards of Central California's premier wine region, the Paso Robles AVA. The City has both a robust wine tourism economy and a wide array of local industries. Key to the wine tourism economy is the preservation of region's scenic character and open vistas that define the Paso Robles region. Impacts to the region's natural resources are of utmost concern. Thus, the City supports all efforts to ensure that the Project will not have any significant or adverse aesthetic or visual impacts within the City of Paso Robles.

City Council Determination on Project

The City understands the need and economic benefits of the Project and has been involved in the CPUC's consideration of this Project since 2016, consistently voicing the need to address aesthetic and visual impacts in the City (refer to Attachment 2 – Paso Robles Notice of Preparation letter). However, after a thorough review of the DEIR, hearing from 14 City's residents and businesses impacted by the Project and receiving numerous written correspondence in opposition to the Project, including a letter from California Assembly Member Cunningham, the Paso Robles City Council unanimously voted to direct staff to notify the CPUC they are **strongly opposed to the proposed project alignment and the City's preferred alternative is Alternative Combination #2, also referred to as the Estrella Route, which incorporates the northern PLR-1A route.**

Benefits of Alternative Combination #2

As explained in the DEIR, Alternative Combination #2 "is considered the most advantageous option and is identified as the Environmentally Superior Alternative" (Draft EIR pg. 5-14). Alternative Combination #2 avoids the significant, permanent aesthetic impacts along Union Road, Highway 46 East and Golden Hill Road

Department of City Manager
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from the proposed Project's 70 kV power lines. Although there are always trade-offs associated with alternatives, the City believes that Alternative Combination #2 is the best for the following reasons:

1. **Union Road / 46 East Impacts**

Union Road / 46 East is the City's Eastern Gateway receiving all incoming traffic from I-5 and the Central Valley. As a primary gateway into the Paso Robles Wine Country region, the appearance of the corridor is vitally important. The 2014 General Plan Conservation Element identifies this area as both a "Gateway to the City" and "Natural Open Space Viewshed" (Attachment 1 - Figure C-3, 2014 Conservation Element).

2. **Golden Hill Road Impacts**

Many property owners and businesses along Golden Hill Road have invested great sums to improve the area and curate a unique, natural experience for enjoying the outdoors. In fact, over the years, some have even been required to underground utility lines along their properties to preserve the natural setting. It would be disingenuous and shameful to have required property owners spend large amounts of money to underground utility lines and then undo those efforts by running a 70 kV power line along that route. Running a new 70 kV power line and poles along this stretch would be devastating to the local businesses and undermine years of work to create the setting that now exists. These businesses and properties are important parts of the local economy, and they depend on preserving the natural environment to succeed. Thus, it is critical that the significant aesthetic impacts along Golden Hill Road be avoided. The proposed undergrounding alternative for this segment may not reduce the visual impacts due to the need to construct two Transition Stations (Figure 3-11 DEIR).

3. **Oak Tree Impacts**

Alternative Combination #2 reduces biological resource impacts by avoiding the area of blue oak woodland near where a known golden eagle nest is located. Again, preserving the natural environment, including trees and wildlife, are of great concern to the City. Thus, the City endorses Alternative Combination #2 to reduce these biological impacts.

4. **Visual Impact Analysis Inadequate**

The DEIR lacks adequate analysis to support the determination that Impact AES-1 would be Less Than Significant and require no Mitigation Measures. The DEIR's limited description of pole heights as "typically would range between 80 to 90 feet" does not provide adequate information to determine impacts at specific locations. PG&E previously disclosed to staff that some poles may be 133 feet tall. Figure 4.1-6 of the DEIR appears to show a significant change to the 46 East Gateway, but the low-resolution exhibit and lack of pole height information provides inadequate information to make a conclusion or support the findings for AES-1. In addition, the project has not been designed to accommodate the Union Road / 46 East overcrossing bridge currently in the PAED process (City NOP comment #6). The design of the bridge's fill slopes will require these poles to be significantly taller than currently shown in the DEIR.

5. **Inadequate Analysis of the Union Road / 46 East Overcrossing Bridge**

The City, Caltrans and the San Luis Obispo Council of Governments (SLOCOG) have been working for over a decade on the design of the State Route 46 overcrossing bridge at Union Road. Caltrans has identified this project as a top priority in San Luis Obispo County due to the important freight traffic connection between US 101 and Interstate 5. This project is currently in the Project Approval and Environmental Determination Phase (PAED) and will be moving into project design and funding in 2022. Funding of the project is a major challenge, and the design of the DEIR project places four new poles in conflict with the interchange project (refer to Attachment 2 – Analysis of PG&E Pole Locations). Due to significant funding constraints, the Bridge Project cannot include the cost to relocate the poles and increase the heights of the poles to provide clearance of the new Union Road

alignment. The project DEIR did not include analysis of transportation impacts if the bridge is not constructed due to conflicts and cost overruns caused by the DEIR's project construction.

6. **Proposed Project Analysis with Paso Robles Incomplete**

The aesthetic impact analysis within the City of Paso Robles is insufficient to support the findings required to build the proposed project within Paso Robles. The City strongly recommends the CPUC approve the Alternative Combination #2 project, with the northern PLR-1A route powerline alignment, rather than revising and recirculating the DEIR for additional public review.

River Road Reconductoring Phase Concerns

All the alternatives include the reconductoring of the existing 70kv pole line that run parallel to River Road. These existing wood poles are located primarily within single family residential yards and silhouette the Salinas River bluffs which is identified in the General Plan Conservation Element as an important Visual Corridor and Natural Open Space Viewshed. The following aesthetic issues were not addressed in the DEIR:



1. **Inadequate Visual Impact Simulation**

The proposed replacement poles will be significantly taller (40± foot increases appear likely) than the existing poles, yet no analysis of this potential impact is included in the DEIR. The visual impact simulation along River Glen Drive is not typical of this segment and is the one area that is not visible from the Salinas River, US 101, Niblick Bridge, or the Downtown area.

2. **Lack of Pole Height Information**

The DEIR does not provide adequate information on the either the height of the existing or proposed poles for the public to understand to potential change or visual impact to their neighbors or the overall community.

3. **Recommended Mitigation Measure AES-1**

Since the visual analysis of this portion of the project is inadequate, the City recommends that the replacement metal poles be of similar size to the existing wood poles. If this is not feasible, then the EIR must be revised and recirculated with a full visual analysis of the visual impact to the River Road corridor along the scenic Salinas River and historic De Anza Trail.

Conclusion

In conclusion the City wants to ensure the project does not have any significant or adverse aesthetic or visual impacts within the City of Paso Robles and has two key points for the CPUC's considerations:

1. The City is strongly opposed to the proposed project alignment and the City's preferred alternative is Alternative Combination #2, also referred to as the Estrella Route, which incorporates the northern PLR-1A route.
2. The City recommends that the replacement metal poles for the River Road Reconductoring Phase be of similar size to the existing wood poles

Note: The City's position on the alignment of the new 70kv reinforcement line has evolved since the City issued its May 6, 2019 Alternatives Screening letter, due to the additional visual analysis information provided in the DEIR.

The City reiterates its request that it be included on the CPUC's mailing list for the Project and that the City be sent copies of all public meeting/hearing notices and other documents under CEQA and the Ralph M. Brown Act, as required by Public Resources Code section 21092 and Government Code section 54954.1. Please provide the City with physical copies of any such notices or other documents at 1000 Spring Street, Paso Robles, CA 93446. Please also provide the City with electronic copies to Warren Frace, Community Development Director at wfrace@prcity.com.

The City appreciates your thoughtful consideration of the above comments and concerns and looks forward to working with you. If you have any questions or would like to discuss further, please contact Mr. Frace at [REDACTED]

Sincerely,

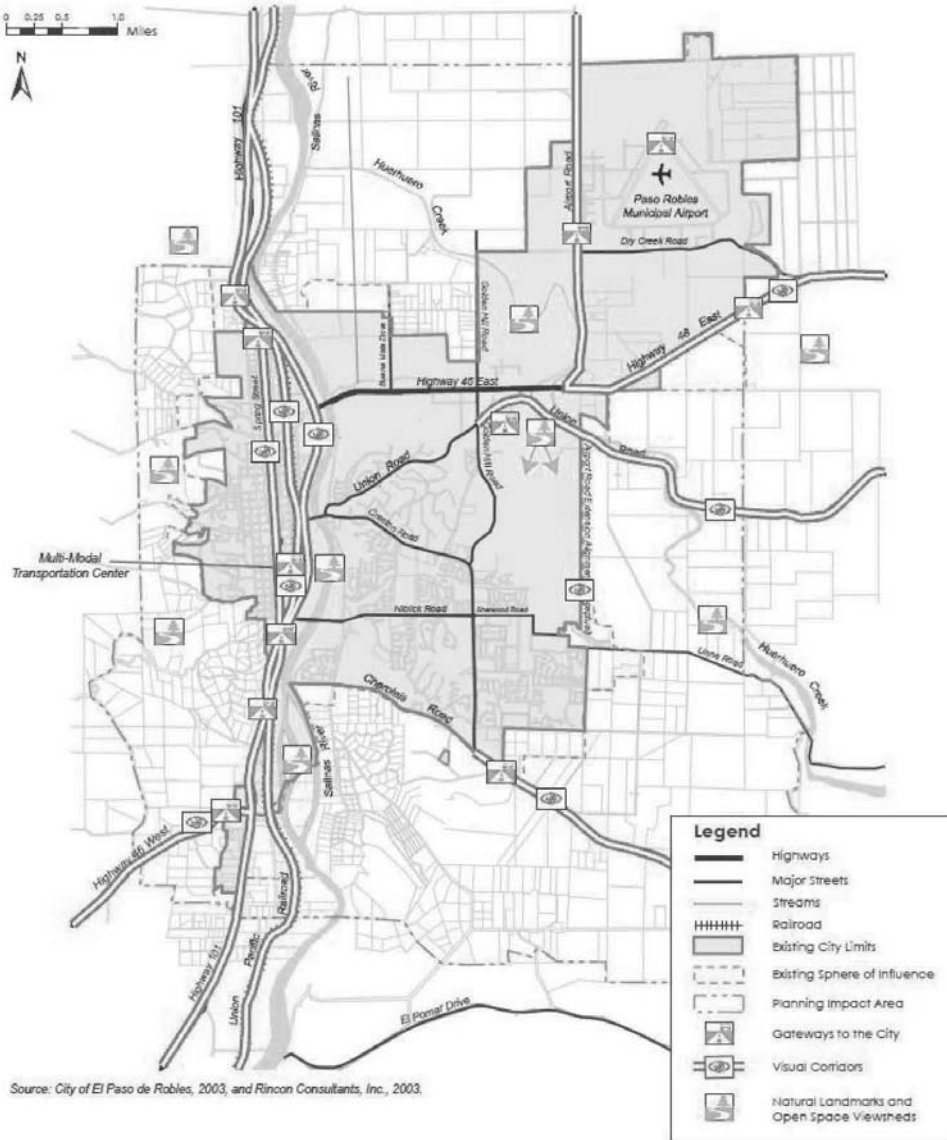


Steven W. Martin
Mayor of Paso Robles

cc: Tom Frutchey
Sarah Johnson-Rios
Warren Frace
Kimberly Hood
City Council

Attachments

1. General Plan Conservation Element – Figure c-3
2. 8/31/18 City of Paso Robles Notice of Preparation Comments letter
3. Analysis of PG&E Pole Locations



City Gateways, Visual Corridors, Natural Landmarks,
 and Open Space Viewsheds

Figure C-3

Attachment 2 - City NOP Response Letter



CITY OF EL PASO DE ROBLES

"The Pass of the Oaks"

August 31, 2018

Robert Peterson
California Public Utilities Commission
c/o Tom Engels
Horizon Water and Environment
400 Capitol Mall, Suite 2500
Sacramento, CA 95814
estrellaproject@horizonh20.com

Subject: Notice of Preparation of an Environmental Impact Report for the Estrella Substation and Paso Robles Area Reinforcement Project proposed by NextEra Energy Transmission West, LLC and Pacific Gas and Electric Company

Dear Mr. Peterson:

The City of El Paso de Robles (City) has received the California Public Utilities Commission's (CPUC) 8/1/18 Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Estrella Substation and Paso Robles Area Reinforcement Project proposed by NextEra Energy Transmission West, LLC and Pacific Gas and Electric Company (Project). We appreciate the opportunity to comment on the proposed Project.

The City believes that early and frequent coordination between the CPUC and the City regarding the proposed Project is necessary to best serve the City and its more-than 30,000 residents. The City is surrounded by scenic rolling hills and California's premier wine regions, thus, the City has both a robust tourism economy and a wide array of local industries. Preserving and highlighting the region's beauty and history are essential. The City routinely acts as the California Environmental Quality Act (CEQA) lead agency for projects in the City, so the City is acutely aware of the natural resources that can be affected by projects in the area. The City hopes to work closely with the CPUC to ensure that the proposed Project has no potentially significant or adverse environmental impacts.

Having reviewed the NOP, the City urges the CPUC to consider the following comments and to diligently analyze all of the proposed Project's potential environmental impacts.

1. The NOP fails to mention Land Use as one of the potential topics to be analyzed. It is important that this topic not be left out. Large projects, such as freeways, railroads, and power lines can have dividing effects on communities, particularly when no mitigation is proposed. Such projects can also affect natural habitats and conflict with local planning measures. Regardless of whether such a project may be exempt from local land use controls, the topic should be fully analyzed in the EIR so that the public and decision makers can fully understand the Project's true effects.
2. Similarly, the Project's potential effects on recreation and housing should also be considered in the EIR. Recreation is hugely important to the City's residents and the tourism industry, and housing is particularly at the forefront of discussions in California. The proposed project power line runs adjacent to Barney Schwartz Park on Union Rd. and has the potential impact the park. Thus, these topics need to be addressed in the EIR

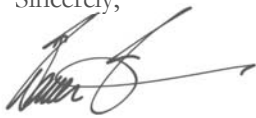
Attachment 2 - City NOP Response Letter

3. Any discussion in the EIR regarding the Paso Robles substation (Niblick Rd. and South River Rd.) needs to consider the significant detrimental effects (i.e., traffic, aesthetics, land use, etc.) that would result from expansion of that facility due to the facility being surrounded on all sides by multi-family residential and commercial uses. The aesthetic and safety impacts of acres of new batteries arrays in this area needs to be thoroughly analyzed and could result in significant impacts. Further, Niblick Road, immediately south of the facility, may need to be expanded in the future, further constraining any potential expansion of this substation.
4. Because of the natural beauty in and around the City, and the City's strong tourism industry, aesthetic impacts are of great concern to the City. The proposed scale of the poles (90 to 113 feet in height) would be significantly taller than the existing 70kv lines in town and out of scale with the community. Thus, to avoid the significant aesthetic and community dividing effects of the Project, transmission lines should be placed underground to the full extent possible. Where undergrounding is not feasible, shorter poles should be considered.
5. Although the Project and its alternative routes are yet to be fully formed, to minimize impacts to residents, the City encourages the CPUC to thoroughly consider utilizing existing roads, such as Highway 46, as a transmission line route.
6. Any transmission line route that crosses Highway 46 Ease at Union Road needs to consider future plans to add an overpass at that location. The City and Caltrans are currently working on a PAED for this interchange project (see attachment 1).

To ensure smooth coordination, the City requests that it be added to the CPUC's mailing list for the Project and that the City be sent copies of all public meeting/hearing notices and other documents under CEQA and the Ralph M. Brown Act, as required by Public Resources Code section 21092 and Government Code section 54954.1. Please provide the City with physical copies of any such notices or other documents at 1000 Spring Street, Paso Robles, CA 93446. Please also provide the City with electronic copies at dmckinley@prcity.com.

The City appreciates your thoughtful consideration of the above comments and concerns and looks forward to working with you. If you have any questions or would like to discuss further, please contact me at [REDACTED] or [REDACTED]

Sincerely,



Warren Frace
Community Development Director
City of El Paso De Robles

cc: Iris Yang
Kimberley Hood
Dick McKinley
Warren Frace
Julie Dahlen

Attachments:

1. 46 East / Union Interchange PAED Alternative 2

Attachment 3 - Interchange Powerpole Conflict Analysis

PG&E POLE INFORMATION

LEGEND

- ① POLE LOCATION #
 - APPROXIMATE 70 KV POLE LOCATION
1. DEPTH OF FILL AT POLE
 - ① OUTSIDE FILL LIMITS
 - ② 1 FT
 - ③ 4 FT
 - ④ 23 FT
 - ⑤ 20 FT
 2. FINISHED SURFACE FROM EX GRADE WHERE NEW 70 KV CROSSES
 - ① 2 FT
 - ② MATCHING GRADES
 - ③ 12 FT
 - ④ 27 FT
 - ⑤ 18 FT
 3. POLE DISTANCE FROM EDGE OF SIDEWALK/ BRIDGE
 - ① 50 FT WEST OF SIDEWALK
 - ② 34 FT WEST OF SIDEWALK
 - ③ 66 FT NORTH OF BRIDGE AND 19 FT WEST OF SIDEWALK
 - ④ 18 FT WEST OF BRIDGE AND 20 FT WEST OF SIDEWALK
 - ⑤ 20 FT WEST OF SIDEWALK



**PHASE 2
PG&E PROPOSED POLE
LOCATIONS**
NO SCALE

DIR#	COUNTY	ROUTE	POST MILES TOTAL PROJECT	SHEET TOTAL SHEETS
05	SLO	46	31.5/32.4	15

REGISTERED CIVIL ENGINEER	DATE	REGISTERED PROFESSIONAL ENGINEER
PLANS APPROVAL DATE _____ THE STATE OF CALIFORNIA OR ITS OFFICERS OR AGENTS SHALL NOT BE RESPONSIBLE FOR OPINIONS OF THIS PLAN SHEET.		
CITY OF PASC ROBLES 1000 Spring Street Paseo Robles, CA 93446		

STATE OF CALIFORNIA - DEPARTMENT OF TRANSPORTATION	CONSULTANT FUNCTIONAL SUPERVISOR	CHRIS METZGER
CALCULATED BY	DESIGNED BY	CHECKED BY
		TEFERI ABERE
REVISD BY	DATE REVISED	