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Jan. 24, 2021

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

RE: Estrella Substation and Paso Robles Area Reinforcement Project

Dear Mr. Peterson,

The Santa Lucia Chapter of the Sierra Club represents the 2,500 members of the Sierra Club, the nation's oldest and largest grassroots environmental organization, in San Luis Obispo County.

We strongly urge you to reject the proposed South River Road route for this project due to the requirement for construction of high-voltage overhead transmission lines over the Rinconada fault, in a High Fire Hazard Zone.

The rejection of this route should not require further elaboration, but we also note the loss of 200-year-old heritage oaks, the placement of utility pole footings in Native American archaeological sites, and likely extirpation of nesting and foraging golden eagles on the site which it would entail.

In its analysis of environmental trade-offs among the alternatives and resource issue areas, weighing significant and unavoidable impacts, short-term and long-term impacts, severity of impacts, and localized and regional effects, the EIR correctly designates Alternative Combination #2 as the Environmentally Superior Alternative. It is also significantly less dangerous and more respectful of the area's cultural heritage. It would avoid the destruction of oak woodland habitat, and, per the EIR at 5.3.2, "would offer the advantages of avoiding the significant aesthetic impacts of the Proposed Project's 70 kV power line."

We believe the most significant finding supporting this designation and pointing to the selection of this route is the Front of the Meter Battery Energy Storage System component: "Implementing FTM BESSs or BTM BESSs and solar under this alternative combination would likely be less impactful, on balance, than buildout of the reasonably foreseeable distribution components (and ultimate substation buildout)... This scenario would be best from an environmental perspective,

as the FTM BESS facilities would not need to be constructed and environmental impacts would be limited overall.”

As this alternative has been deemed feasible, meets the project objectives, and would result in the fewest or least severe combination of significant environmental impacts, we urge its designation as the route for the Estrella Substation and Paso Robles Area Reinforcement Project.

Thank you for the opportunity to comment on this issue,

Andrew Christie, Director  
Sierra Club, Santa Lucia Chapter