



Santa Ysabel Ranch Homeowners Association

January 11, 2022

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

Re: Opposition to Estrella Project SE-PLR-2, Templeton - S. River Route Alternative due to Air Quality Impact to our residents

Dear Dr. Engels,

I represent the owners of 146 homes and lots in Santa Ysabel Ranch. As the HOA president I must relay our strenuous objections to the SE-PLR-2 alternative. Our concern over health-related ramifications due to the Air Quality issues of this project is difficult to overstate. Revised DEIR Section 4.3-Air Quality states that emissions, particulate matter and Valley Fever exposure during construction would be "Significant and Unavoidable."

In the Revised DEIR Section 4.3 - Air Quality speaks to "Sensitive Receptors" on 2-R.4.3-11. *"Sensitive receptors are those segments of the population that are most susceptible to the effects of poor air quality, such as children, the elderly, and individuals with preexisting health problems (e.g., asthma) (CARB 2005)."* SLO County Air Pollution Control District includes people with compromised cardiac systems as Sensitive Receptors. Revised DEIR 2-R.4.3-19: *"The calculated health effects are dependent upon the concentrations of pollutants to which the receptors are exposed, the number and type of exposure pathways for a receptor, and the intake parameters for a receptor, which vary based upon age and sensitivity (e.g., presence of pre-existing conditions). Health effects would be more likely for individuals with greater susceptibility to exposure, and the location of receptors relative to the project impacts would affect whether receptors are exposed to project-related pollutants."*

While our resident demographic generally skews older, we have had young families moving here in the past few years. There are currently 33 single-family homes that sit within 1000' feet of the proposed power poles. We just completed an age and health survey involving those residents. The response rate was 88%. The results surprised us, showing the prevalence of cardiac and respiratory issues among our residents, young and old. Survey results as follows:

Ages of resident adults living within 1000' of Proposed Project:

1 between 90 and 99	14 between 50 and 59
4 between 80 and 89	4 between 40 and 49
12 between 70 and 79	2 between 30 and 39
20 between 60 and 69	2 between 20 and 29



Santa Ysabel Ranch Homeowners Association

Ages of resident children (total 11) living within 1000' of Proposed Project:

1 one-year-old	1 fourteen-year-old
2 five-year-olds	1 fifteen-year-old
1 seven-year-old	3 seventeen-year-olds
1 eight-year-old	* 1 eleven-year-old in a child-care setting
1 thirteen-year-old	

Seventy residents live within 1000' of the proposed project, and breakdown as follows: 17 residents aged between 70 and 99, 11 children, 16 have cardiac system problems, and 21 have respiratory issues (predominately asthma). Of the total 70 residents within 1000' 53 qualify as Sensitive Receptors.

Of special concern to us is the great increase in exposure to Valley Fever that construction would cause. We know that Santa Ysabel Ranch has Valley Fever fungus in our soil. A resident of Warm Springs Lane (the location of 10 pole sites) contracted Valley Fever in October, 2011 while sweeping out his garage. The disease has drastically changed his life. A former long-distance runner and skier he can no longer do either activity, and has to cope with brain and motor skill impacts on a daily basis.

The DEIR does not fully take into account the impacts of proximity and prolonged exposure as applied to the layout of Santa Ysabel Ranch. Revised DEIR 2-R.4.3-25: *"In most locations of pole installation for the Proposed Project, a given sensitive receptor would only be potentially exposed to emissions for the short amount of time it takes to install about 3 poles. After 3 poles, the distance to the sensitive receptor would be greater than 1,000 feet."* We feel this characterization is incorrect in our case.

Proximity:

- 1) The main entry gate to Santa Ysabel Ranch would sit between two poles, as does the mailbox location used by all residents. Soil disturbance in this area would be extensive. This situation would expose every SYR resident, every day to these health hazards, not just those living within 1000'.
- 2) The poles on the east side of SYR would be put into the strip of land between S. River Rd. and Warm Springs Lane, on SYR property. Warm Springs is the only way out for those 24 residents. Leaving their homes would put them within 10-15' of the soil disturbance, passing up to 10 poles on Warm Springs. That is the only road on which people can walk their dogs, or walk to the SYR mailboxes. Opening any windows in their homes would allow the emissions, dust and particulate matter inside. Property lines are as close as 35' from soil disturbance and front doors as close as 155'. There are 18 Sensitive Receptors living on Warm Springs Lane. The 3-pole guideline does not apply due to proximity and number of exposure pathways. Revised DEIR 2-R.4.3-19: *"The calculated health effects are dependent upon the concentrations of pollutants to which the receptors are exposed, the number and type of exposure pathways for a receptor, and the intake parameters for a receptor, which vary based upon age and sensitivity...Health effects would be more likely for individuals with greater susceptibility to exposure, and the location of receptors relative to the project..."*



Santa Ysabel Ranch Homeowners Association

- 3) The property line of one home on Warm Springs stops at S. River Rd. itself. It is unclear from the DEIR map whether they would have one or two poles on their property. These residents are in their 80's and 70's, one with asthma. From RDEIR pg. 19: "*Health effects would be more likely for individuals with greater susceptibility to exposure, and the location of receptors relative to the project...*"
- 4) Between Fire Rock Loop and Santa Ysabel Ave. there are 21 homes within 1000' of proposed pole locations. Thirty five of those residents are Sensitive Receptors with cardiac and respiratory health issues, including a 14 and 15 year-old with asthma.
- 5) On Fire Rock Loop there are 3 homes with children, ages 1, 5, 7, 13, 15, 17 & 17. The back yards of these homes are between 30-60' from the pole locations. Children should be able to play in their back yards safely. From RDEIR pg. 19: "*Health effects would be more likely for individuals with greater susceptibility to exposure, and the location of receptors relative to the project...*"

Duration

1) In 2017 Tom Johnson of PG&E informed us that power lines installed near fault lines are generally taller and wider, requiring larger foundations. Given the fact that the 70kV line would cross potential 7.3 magnitude earthquake faults in 4 places, and run between 3 fault lines on the Warm Springs Lane section (per 2016 Paso Robles Hazard Plan, updated Seismic Hazard Maps) we believe the construction schedule is incorrect. We have not been assured that the current schedule takes into account the increased helicopter trips, construction traffic and amount of earth moved. This would mean the project would take longer, further exposing SYR residents.

RDEIR 2-R.4.3-38 states that the effects on Sensitive Receptors living near SE-PLR-2 "*...may result in adverse health impacts. This impact would be significant.*"

We vehemently oppose the SE-PLR-2 S. River Rd. Alternative due to the tremendous health hazards that months of emissions, particulate matter and Valley Fever exposure would cause our residents. We support Alternative Combination #2, the top-ranked alternative due to less impact. We are joined in both of these positions by State Assemblyman Cunningham, County Supervisor Peschong, Paso Robles Mayor Martin, the Sierra Club, Audubon Society, and EcoSlo.

Regards,

(See notes on DEIR Deficiencies on following page)

Tom Erskine
President, Santa Ysabel Ranch Homeowners Association



Santa Ysabel Ranch Homeowners Association

Draft EIR Deficiencies in Revised DEIR Section 4.3 - Air Quality

Construction Schedule, 2-R.4.3-37: *"In total, construction of the new 70 kV power line segment for Alternative SE-PLR-2 would take 9 months less than the Proposed Project's 70 kV power line."*

We challenge the assertion that SE-PLR-2 would take 9 months less to complete than the Proposed Project. There has been no assurance given to us that the following 2 conditions have been taken into account in that timeline:

1) The 70kV line would cross potential 7.3 magnitude earthquake faults in 4 places, and run between 3 fault lines on the Warm Springs section (per 2016 Paso Robles Hazard Plan, updated Seismic Hazard Maps). In 2017 Tom Johnson of PG&E informed us that power lines installed near fault lines are generally taller and wider, requiring larger foundations. Would such deviations from standard poles and foundations not require more time in construction? A longer timeline would mean more exposure to emissions, particulate matter and Valley Fever.

(Please clarify exactly how tall and wide the poles in front of Santa Ysabel Ranch would be given the needed compensation for fault-line proximity. Also, please clarify the sizes of the pole foundations required for the larger/wider poles)

2) The S. River Rd. route will put a second 70kV line along the North end of the route, toward the Paso substation. We have been informed that either the existing 70kV line or the new line will be put underground. Does undergrounding 1.1 miles of line take longer than installation of poles? A longer timeline would mean more exposure to emissions, particulate matter and Valley Fever.

Santa Ysabel Ranch Estrella Report

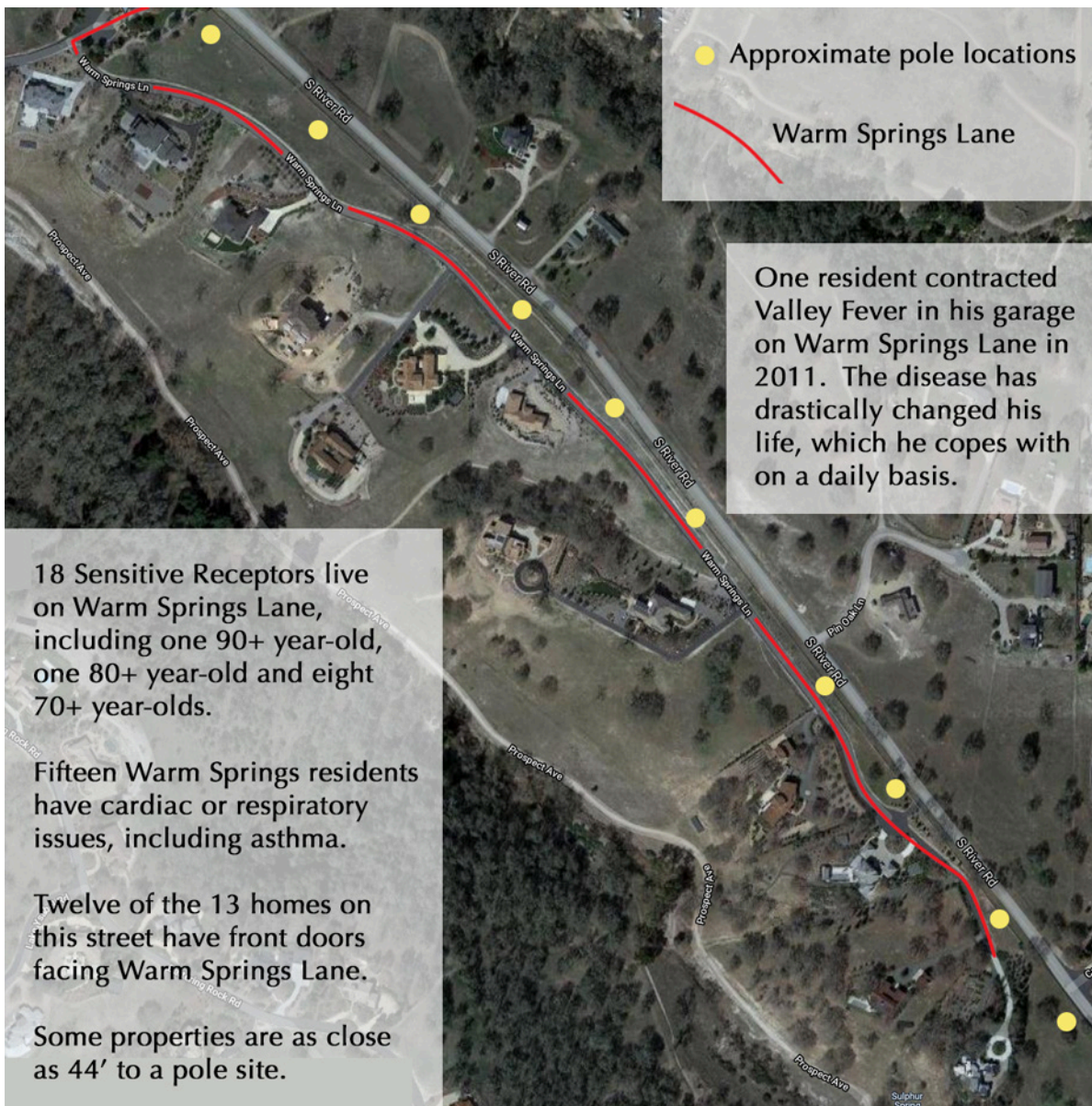
Opposition to SE-PLR-2 South River Road Alternative

Revised DEIR Air Quality, Jan. 2022



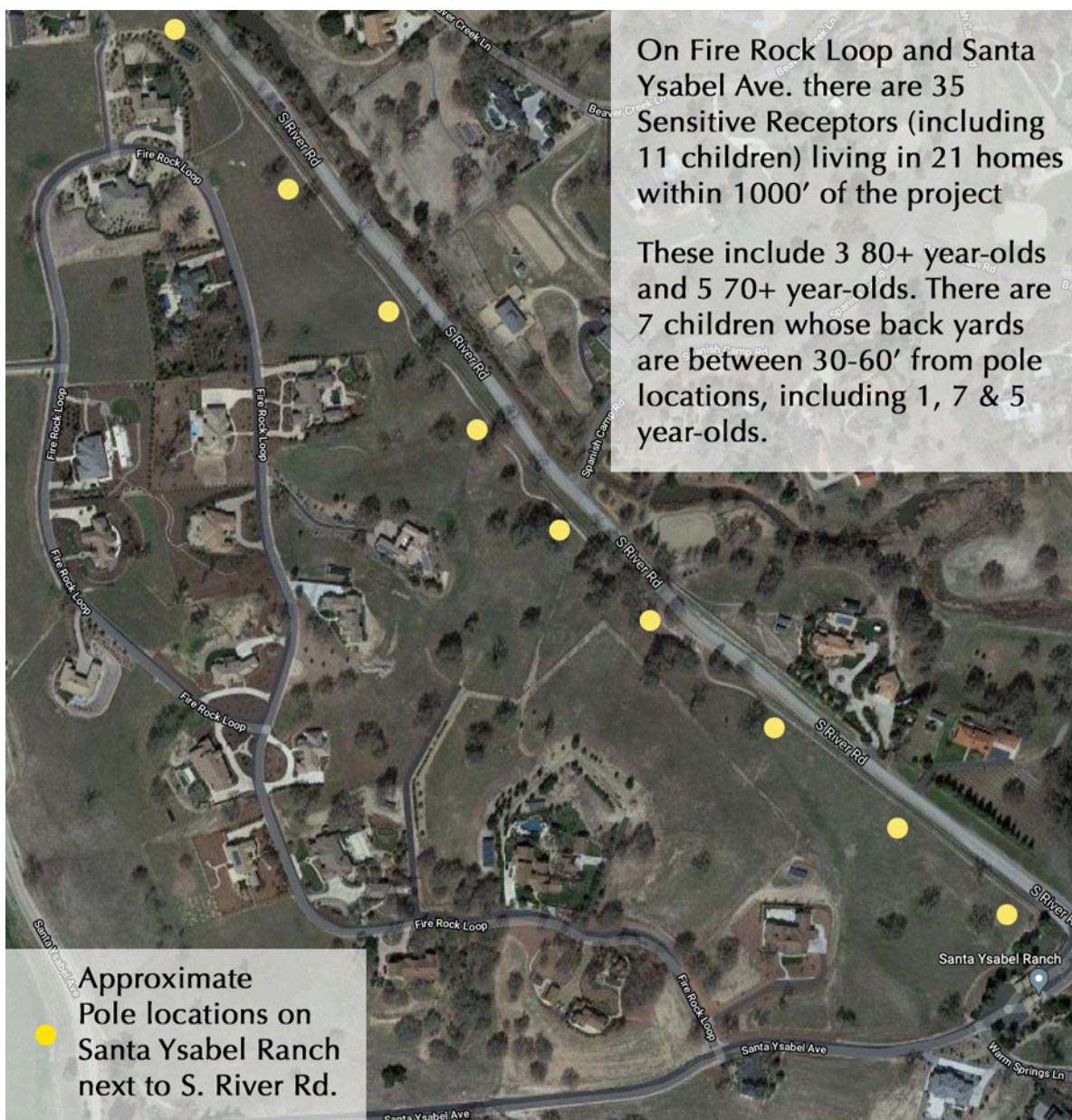
The RDEIR underestimates the health impacts of air quality due to proximity of the 13 homes on Warm Springs Lane. This street is the only way in and out for these residents. It is where they walk their dogs and walk to the mailbox. Avoiding repeated and prolonged exposure to soil disturbance areas is impossible as they live only feet away.

RDEIR 2-R.4.3-19: *“The calculated health effects are dependent upon the concentrations of pollutants to which the receptors are exposed, the number and type of exposure pathways for a receptor, and the intake parameters for a receptor, which vary based upon age and sensitivity (e.g., presence of pre-existing conditions). Health effects would be more likely for individuals with greater susceptibility to exposure, and the location of receptors relative to the project impacts would affect whether receptors are exposed to project-related pollutants.”*

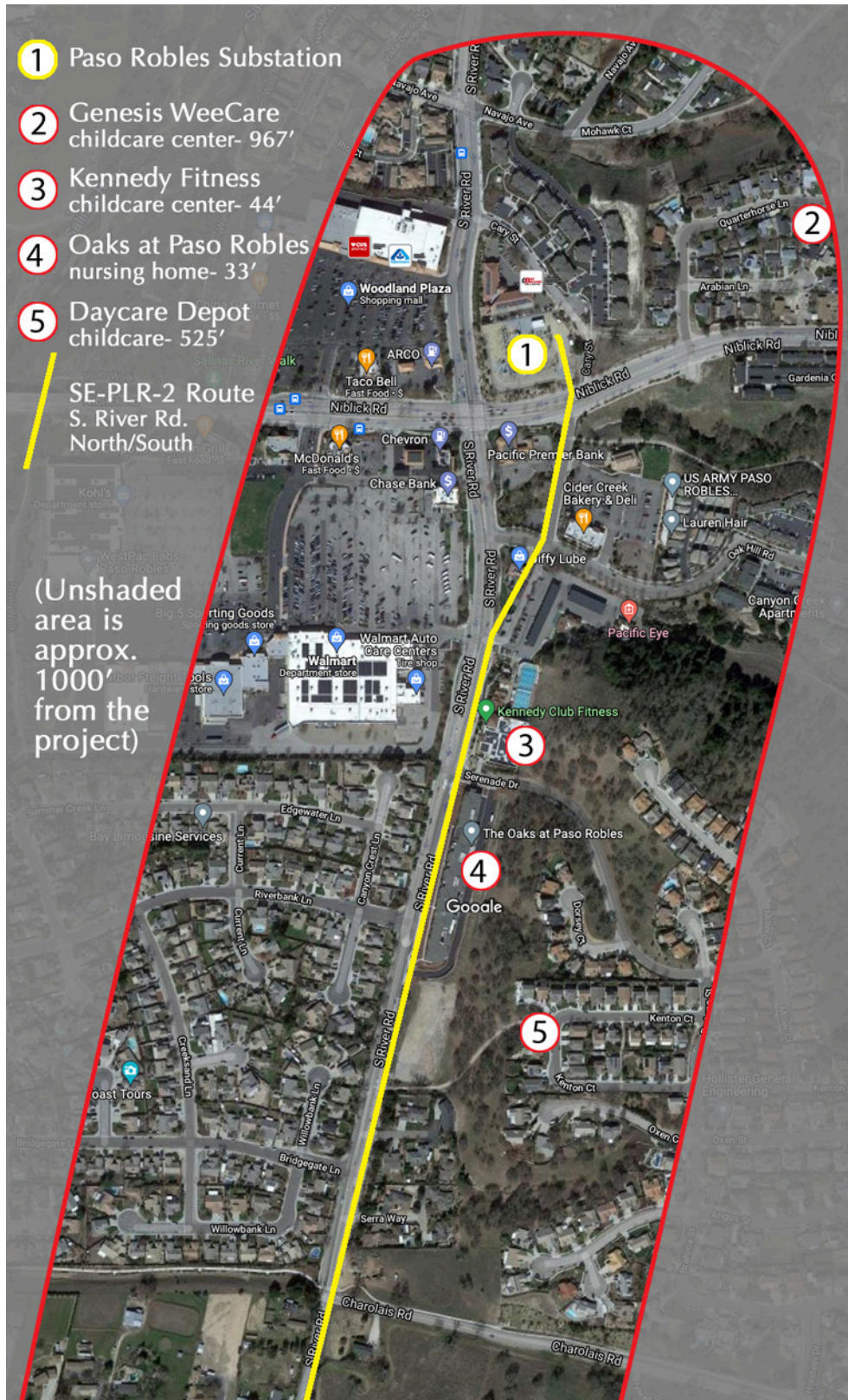


Revised DEIR 2-R.4.3-19: “Health effects would be more likely for individuals with greater susceptibility to exposure, and the location of receptors relative to the project...”

There are 21 homes (within 1000’ of proposed pole locations) on Fire Rock Loop and Santa Ysabel Ave. Thirty five of those residents are Sensitive Receptors with cardiac and respiratory health issues, including 14 and 15 year-olds with severe asthma. On Fire Rock Loop there are 3 homes with 7 children between the ages of 1-17. Their backyards are between 30-60’ from the proposed pole locations.



4 Sensitive Receptor Locations along North/South of S. River Rd. alternative



- 1 Paso Robles Substation
- 2 Genesis WeeCare childcare center- 967'
- 3 Kennedy Fitness childcare center- 44'
- 4 Oaks at Paso Robles nursing home- 33'
- 5 Daycare Depot childcare- 525'

SE-PLR-2 Route S. River Rd. North/South

(Unshaded area is approx. 1000' from the project)

RDEIR 2-R.4.3-11:

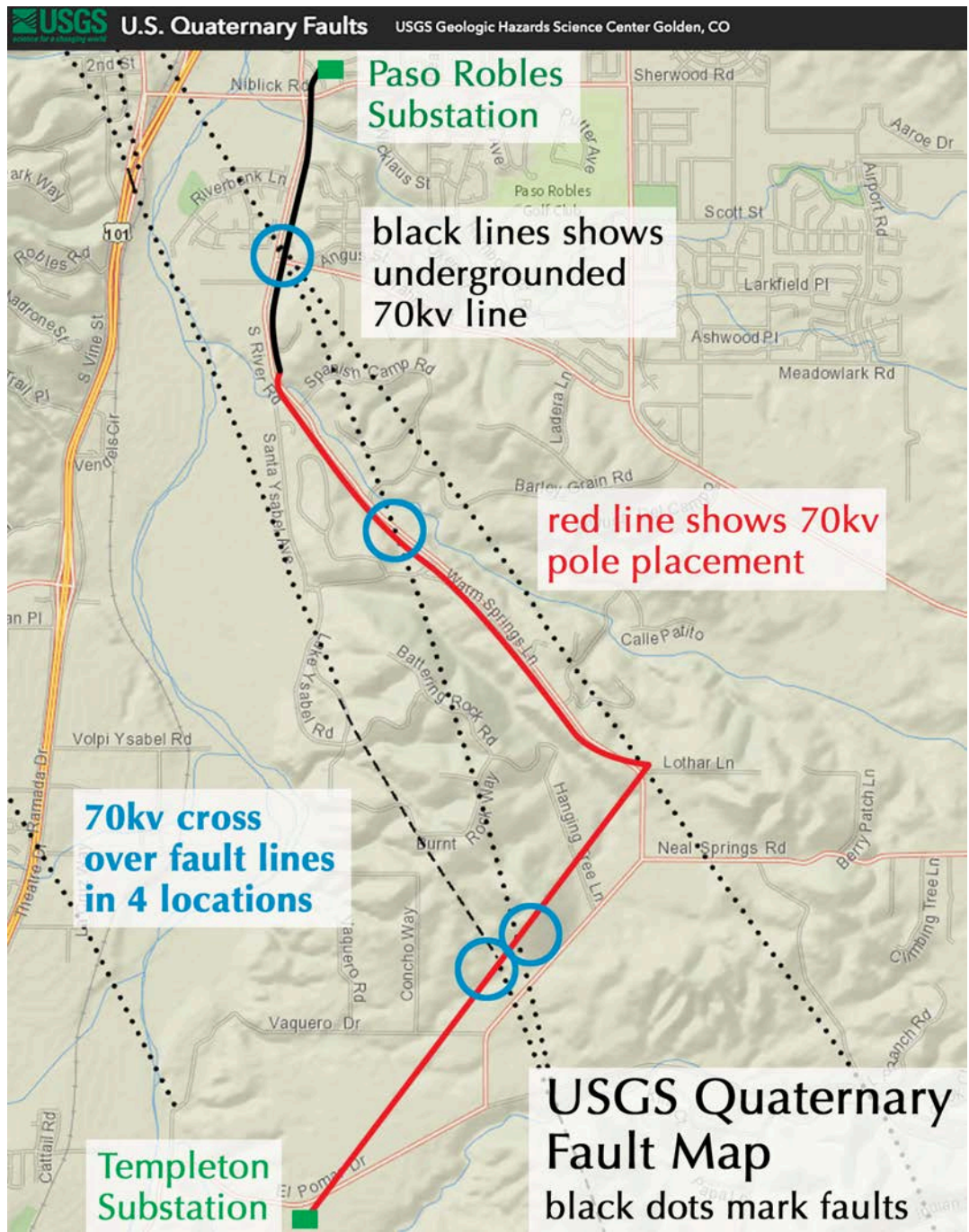
“Examples of locations that may contain sensitive receptors include residences, senior living complexes, schools, parks, daycare centers, nursing homes, and medical facilities.”

Within 1000' of the project (shown as a yellow line) there are 4 Sensitive Receptor Locations:

- Genesis WeeCare, a childcare center 967' away
- Kennedy Fitness, with childcare center 44' away
- The Oaks at Paso Robles, a nursing home & memory care facility with 97 studio, 1-bedroom and 2-bedroom apartments 33' away
- Daycare Depot, a childcare center 525' away

The 2016 Paso Robles Hazard Plan (4-9,10) refers to the updated USGS National Seismic Hazard Maps. (shown below)

According to the Paso Robles Hazard Plan, the Rinconada Fault line has the potential to cause a magnitude 7.3 earthquake. Per Tom Johnson of PG&E (2017) proximity to fault lines would require taller and wider poles with larger foundations. Would these requirements extend the timeline? If so, our exposure to emissions, particulate matter and Valley Fever would increase.



There is an existing 70kV power line on the North/South section of S. River Rd. Due to this fact one of the 70kV lines on that section of S. River Rd. would need to be installed underground. (per Horizon Water & Environment)

Would putting a 1.1 mile section of the 70kV line underground take longer than standard pole installations?

If so, the DEIR needs to reflect both of the above scenarios and adjust the timeline accordingly. The adverse health impacts of SE-PLR-2 due to Air Quality issues would be greater than currently estimated.