4.20 Wildfire

4.20.1 Introduction

This section presents the environmental and regulatory setting related to wildfire, and evaluates the potential wildfire impacts associated with the Proposed Project, reasonably foreseeable distribution components, and alternatives. Potential impacts are evaluated in light of existing laws and regulations governing wildfire and the existing physical environmental setting.

4.20.2 Regulatory Setting

Federal Laws, Regulations, and Policies

The National Strategy

Pursuant to the 2009 Federal Land Assistance, Management, and Enhancement Act (FLAME Act), the U.S. Department of Agriculture and U.S. Department of the Interior undertook a process to develop a national cohesive wildland fire management strategy to comprehensively address wildland fire management across all lands in the U.S. The National Strategy recognizes and accepts fire as a natural process necessary for the maintenance of many ecosystems and strives to reduce conflicts between fire-prone landscapes and people (U.S. Department of Agriculture and U.S. Department of the Interior 2014). Specifically, the National Strategy identifies the following primary goals:

- **Restore and maintain landscapes:** Landscapes across all jurisdictions are resilient to fire-related disturbances in accordance with management objectives.
- **Fire adapted communities:** Human populations and infrastructure can withstand a wildfire without loss of life and property.
- **Wildfire response:** All jurisdictions participate in making and implementing safe, effective, efficient risk-based wildfire management decisions.

State Laws, Regulations, and Policies

2018 Strategic Fire Plan for California

The Strategic Fire Plan, developed by the State Board of Forestry and Fire Protection, provides direction and guidance to the CAL FIRE and its 21 field units. The 2018 Plan sets forth a number of goals focused on fire prevention, natural resource management, and fire suppression efforts, which are listed here (CAL FIRE 2018):

a. Improve the availability and use of consistent, shared information on hazard and risk assessment;

b. Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities;

c. Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans;

d. Increase awareness and actions to improve fire resistance of man-made assets at risk and fire resilience of wildland environments through natural resource management;

e. Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers;

f. Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services; and

g. Implement needed assessments and actions for post-fire protection and recovery.

Community Wildfire Prevention & Mitigation Report

The Community Wildfire Prevention & Mitigation Report was prepared by CAL FIRE in response to Executive Order N-05-19, which directed CAL FIRE, in consultation with other state agencies and departments, to recommend immediate, medium and long-term actions to help prevent destructive wildfires, with a specific focus on vulnerable communities and populations in the state (CAL FIRE 2019). Based on local fire plans developed by CAL FIRE Units, CAL FIRE identified 35 priority projects for immediate implementation to help reduce public safety risk for over 200 communities. Projects include removal of hazardous dead trees, vegetation clearing, creation of fuel breaks and community defensible spaces, and creation of ingress and egress corridors. However, none of the identified priority projects are located within the Paso Robles vicinity (CAL FIRE 2019). The Community Wildfire Prevention & Mitigation Report also identifies near-term administrative, regulatory and policy actions to address community vulnerability and wildfire fuel buildup through rapid deployment of resources.

Wildfires and Climate Change: California's Energy Future

Wildfires and Climate Change: California's Energy Future is a report from the Governor's Strike Force that describes the steps the state must take to reduce the incidence and severity of wildfires (Governor Newsom's Strike Force 2019). Among its objectives include:

- assuring access to safe, reliable and affordable power;
- reducing the severity of wildfires through continued investments in fire mitigation and vegetation management;
- implementing technologies to identify and respond more quickly to wildfires;
- reducing the number of utility-sparked wildfires through investments in safety, prevention, grid hardening, and vegetation management around electrical lines; and
- facilitating fair and prompt treatment for wildfire victims and allocating the burden of wildfire damage responsibly and fairly across all stakeholders.

The report evaluates the current system of allocating wildfire damage costs and proposes several new concepts, including a liquidity-only fund; changing strict liability to a fault-based standard, and a wildfire fund (Governor Newsom's Strike Force 2019). The report also discusses the CPUC's current role as the regulator of the utilities in California and finds that the CPUC should expand its safety expertise, overhaul its decision-making processes to more effectively integrate safety considerations, and take other actions to better oversee the utilities with respect to wildfire safety (Governor Newsom's Strike Force 2019).

California Fire Code

The California Fire Code (24 CCR Part 9) establishes minimum requirements to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings. Chapter 33 of the Code contains requirements for fire safety during construction and demolition activities, such as development of a pre-fire plan in coordination with the fire chief; maintaining vehicle access for firefighting at construction sites, and requirements related to safe operation of internal combustion engine construction equipment.

CAL FIRE Wildland Fire Management

CAL FIRE implements the Vegetation Management Program (VMP), which uses prescribed fire, and some mechanical means, for addressing wildland fire fuel hazards and other resource management issues on SRAs (CAL FIRE 2020a). The VMP is derived from SB 1704 and is codified in 14 CCR, Chapter 9.8, Sections 1560 to 1569.6, as well as California PRC Sections 4461 to 4473, 4475 to 4480, and 4491 to 4494. The VMP allows private landowners to enter into a contract with CAL FIRE to use prescribed fire to accomplish a combination of fire protection and resource management goals (CAL FIRE 2020a). In December, 2019, CAL FIRE certified the California Vegetation Treatment Program EIR (Office of Governor Gavin Newsom 2019), which evaluated potential environmental impacts of CAL FIRE's various treatment methods for controlling vegetation and wildland fire fuels under its VMP.

Fire Hazard Severity Zone Mapping

CAL FIRE develops maps depicting Fire Hazard Severity Zones (FHSZs) for SRAs and Local Responsibility Areas (LRAs). A FHSZ is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard (i.e., moderate, high, and very high) (CAL FIRE 2020b). FHSZ maps evaluate wildfire hazards, which are physical conditions that create a likelihood that an area will burn over a 30- to 50-year period. They do not take into account modifications such as fuel reduction efforts (CAL FIRE 2020b). FHSZs are meant to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk (CAL FIRE 2020b).

California Public Resources Code Requirements for Wildland Fire Safety

The California PRC includes fire safety regulations restricting the use of certain equipment that could produce sparks or flames, and specifies requirements for the safe use of gasoline-powered tools in fire hazard areas. The following requirements apply to construction activities at any sites with forest-, brush-, or grass-covered land:

a. Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442).

b. Appropriate fire-suppression equipment must be maintained from April 1 to December 1, the highest-danger period for fires (PRC Section 4428).

c. On days when a burning permit is required, flammable materials must be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor must maintain the appropriate fire-suppression equipment (PRC Section 4427).

d. On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines must not be used within 25 feet of any flammable materials (PRC 4431).

California Public Utilities Commission General Order 95: Rules for Overhead Electric Line Construction

CPUC G.O. 95 (CPUC 2020a) specifies requirements for overhead transmission line design, construction, and maintenance, including requirements to avoid or minimize potential safety hazards. These requirements include standards for vegetation management and maintenance of minimum vegetation clearances from high-voltage lines to minimize potential fire hazard. These minimum clearances must be maintained through activities such as tree trimming prior to construction and throughout operation and maintenance of transmission lines.

California Public Utilities Commission Fire-Threat Mapping and High Fire-Threat District Requirements

The CPUC's Fire-Threat Area Map depicts areas where there is an elevated risk for power line fires igniting and spreading rapidly, thus requiring stricter fire-safety regulations (CPUC 2018, 2020b). The Fire-Threat Area Map includes the following fire threat categories:

- **Tier 2** consists of areas where there is an elevated risk for destructive utility-associated wildfires.

- **Tier 3** consists of areas where there is an extreme risk for destructive utility-associated wildfires.

Tier 2 and 3 areas, along with Zone 1, consisting of Tier 1 High Hazard Zones (HHZs) on the map of Tree Mortality HHZs prepared by U.S. Forest Service and CAL FIRE, make up the High Fire-Threat District (HFTD) identified in CPUC Decision 17-12-024. The HFTD is subject to increased requirements under G.O. 95, including requirements to prioritize correction of safety hazards in the HFTD, maintaining stricter Case 14 vegetation clearances, and annual patrol inspections of overhead electric utility distribution facilities in rural Tier 2 and 3 areas of the HFTD, among others (CPUC 2017).

Utility Wildfire Mitigation Plans

Pursuant to SB 901, since 2018, the CPUC has required electrical utilities to submit Wildfire Mitigation Plans (WMPs) assessing the level of wildfire risk within their service areas and outlining their plans to address this risk. ABs 1054 and 111 have subsequently provided for the WMP review and oversight process at the CPUC to be handled through the newly created Wildfire Safety Division (WSD) (CPUC 2019). WSD and Safety Enforcement Division (SED) staff determine whether or not the actions proposed by each utility are appropriate to address the level of risk identified and whether the plan will put the utility on a path to achieving the Commission's long-term wildfire risk reduction goals (CPUC 2019). WSD and SED staff instituted updated WMP Guidelines for 2020. The Proposed Project Applicants, HWT and PG&E, have both submitted WMPs for 2020, which have been approved with conditions by the CPUC (CPUC 2020c) in line with those updated 2020 WMP Guidelines.

Pursuant to California Public Utilities Code Chapter 6, Wildfire Mitigation, Section 8386, PG&E and HWT annually prepare and submit their WMPs to WSD[1] for review and approval. The WMPs demonstrate the commitment of PG&E and HWT to control wildfire risk using industry best practices and best-available tools, including asset management, vegetation management, situational awareness, weather forecasting, and system hardening. The final, 2020 PG&E and HWT wildfire mitigation plans are available here: https://www.cpuc.ca.gov/wildfiremitigationplans.

Fire Prevention Standards for Electric Utilities

The Fire Prevention Standards for Electric Utilities (14 CCR, Section 1250-1258) provide definitions, maps, specifications, and clearance standards for projects in SRAs. Similar to CPUC G.O. 95, 14 CCR Section 1254 specifies minimum vegetation clearances around electric transmission and distribution facilities. These firebreak clearances are applied within a 10-foot radius from any pole or tower subject to the requirements, and require the following:

a) At ground level: remove flammable materials, including but not limited to, ground litter, duff and dead or desiccated vegetation that will allow fire to spread, and;

b) From 0 to 8 feet above ground level: remove flammable trash, debris or other materials, grass, herbaceous and brush vegetation. All limbs and foliage of living trees shall be removed up to a height of 8 feet.

c) From 8 feet to the horizontal plane of the highest point of conductor attachment: remove dead, diseased or dying limbs and foliage from living sound trees and any dead, diseased or dying trees in their entirety.

[1] In 2019, the CPUC initiated a project to create a vision, strategy, and roadmap to outline its efforts to systematically reduce the risk of ignition of wildfires by utility infrastructure. A new WSD was established pursuant to California Public Utilities Code Section 326 to oversee and enforce compliance with wildfire safety requirements.

4.20.3 Environmental Setting

In this DEIR, a wildfire is defined as an uncontrolled fire spreading through vegetative fuels, exposing and possibly consuming structures. Wildfires may occur due to human activity (e.g., arson, campfire, debris burns) or natural events (e.g., lightning). Among the primary factors that impact wildfire intensity and behavior include weather (e.g., wind and humidity), fuel conditions (e.g., vegetation type and age, accumulation of dead material, etc.), and topography (e.g., steep terrain).

Location and Site Characteristics

The Proposed Project would span both unincorporated areas of the county as well as the city of Paso Robles. The proposed Estrella Substation would be located on approximately 15 acres of land within an existing vineyard. The area immediately north of Union Road is irrigated agriculture and there are existing 230 and 500 kV transmission lines immediately north of the proposed substation site. South of Union Road in the area of the proposed Estrella Substation site, there is some undeveloped land (i.e., grassland, scattered oak trees) as well as agricultural land and scattered residences. The topography of the Estrella Substation site is moderately sloped with rolling hills in the vicinity. From the substation site, the proposed 70 kV power line runs west primarily through irrigated agricultural lands before turning north/northwest and traversing through the city of Paso Robles, ultimately meeting the existing 70 kV power line between San Miguel and Paso Robles substations. Portions of the 70 kV power line alignment include residential, commercial, and light industrial land uses. The reasonably foreseeable distribution components pass primarily through agricultural lands and along existing road rights-of-way.

The alternative substation sites under consideration (Alternative SS-1 and Alternative SE-1A) have elevated wildfire risk compared to the proposed Estrella Substation site due to the presence of additional vegetative fuel in these areas. Specifically, the Alternative SS-1 site is located adjacent to the Estrella River corridor, which has riparian vegetation that may become dry during the fire season. The Alternative SE-1A site similarly is adjacent to unmanaged oak woodland areas that may provide a greater amount of vegetative fuel compared to the amount of potential fuel adjacent to the Estrella Substation site. As described further below, both of these sites are located within HFHSZs. Both power line routing alternatives (Alternative PLR-1A and PLR-1C) would pass through largely agricultural areas, although portions of these routes would border areas that are undeveloped grassland or oak woodland. In particular, Alternative PLR-1C MRV 1 would follow Estrella Road, which borders the Estrella River corridor.

Alternative PLR-3 would follow the Proposed Project 70 kV route (or deviate slightly from the proposed route for Option 1). This area of the proposed 70 kV route has industrial uses as well as existing single-family residential development and recreational uses. The northern portion of both Alternative PLR-3 route options passes through areas of relatively undeveloped blue oak woodlands. The Alternative SE-PLR-2 route would follow the existing 230/500 kV transmission line corridor northeasterly out of Templeton Substation for approximately 2 miles, then veer to the northwest and northerly for approximately 3 miles, passing through areas of agricultural and rural residential development, including areas of grassland and oak woodland.

All of the example FTM BESS sites that are considered for analysis purposes for Alternative BS-2 are vacant parcels or portions of parcels. FTM Sites 1 through 4 are located within areas of existing urban development, while FTM Site 5 is located adjacent to the CAL FIRE Air Attack Base (Figure 4.9-2) in an area of grassland within surrounding agricultural development. The example FTM Sites 6 through 8 are each located adjacent to existing regional substations.

Fire Zones

As discussed in Section 4.9, "Hazards and Hazardous Materials," and shown in Figure 4.9-2, the Proposed Project would be outside of any identified VHFHSZ or HFHSZ. The Proposed Project components would be located entirely within the LRA not designated as a VHFHSZ. However, the SRA HFHSZ is located across Union Road to the south of the proposed Estrella Substation site. Similarly, under the CPUC's fire threat mapping, none of the Proposed Project components would be located within Tier 2 (elevated) or Tier 3 (extreme) fire threat areas. The reasonably foreseeable distribution components would be located primarily outside of the HFHSZ, although one 21/12 kV pad-mounted transformer would be installed on the border of the HFHSZ (none of the components would be within Tier 2 or 3 fire threat areas).

As shown on Figure 4.9-2, several of the alternatives would be located within or on the border of a HFHSZ. Specifically, Alternatives SS-1 and SE-1A would be entirely located in the HFHSZ while the Alternative SE-PLR-2 alignment would be almost entirely located in the HFHSZ except the northern portion which is within the Paso Robles city limits. Portions of the Alternative PLR-1A and PLR-1C alignments would border the HFHSZ, while a small portion of Alternative PLR-1C would pass through the HFHSZ. The majority of the length of Alternative PLR-1C Minor Route Variation 1 would border the HFHSZ along Estrella Road. Example FTM Sites 1-5 and 7 considered for the analysis would be located within the LRA not mapped as VHFHSZ; however, FTM Sites 6 and 8 would be within the SRA HFHSZ. Alternative PLR-3 (both options) would both be located in the LRA non-VHFHSZ. None of the alternatives would be located in a CPUC-designated Tier 2 or 3 fire threat area (CPUC 2018).

Wildfire History in the Area

Although the immediate Proposed Project site is not identified as a high wildfire hazard area by CAL FIRE or the CPUC, the greater Paso Robles area and surrounding region have been prone to wildfire. Since 1913, there have been over 700 wildfires in the vicinity of Paso Robles and 10 of these fires have burned greater than 10,000 acres. Two wildfires have occurred within the city of Paso Robles limits: a 200-acre fire in 1994 and a 65-acre fire in July 2013 (City of Paso Robles 2016). The most damaging fire in the region in recent history was the Chimney Fire in August 2016, which burned more than 46,300 acres and destroyed 70 structures. This fire occurred south of Lake Nacimiento, approximately 20 miles northwest of the Proposed Project (CAL FIRE 2020c).

The Salinas Riverbed corridor, which runs through the city of Paso Robles, in particular has been susceptible to fire. In 2018, emergency response personnel responded to 115 fires in the riverbed corridor and 63 fires during the first half of 2019. Due to their proximity to critical city infrastructure, as well as residential and commercial properties, the City of Paso Robles proclaimed a local emergency related to the riverbed fires in July of 2019 (County of San Luis Obispo 2019).

4.20.4 Impact Analysis

Methodology

Impacts related to wildfire were evaluated qualitatively by considering aspects of the Proposed Project, reasonably foreseeable distribution components, and alternatives as they relate to applicable CEQA Guidelines Appendix G significance criteria (identified below) and the existing regulatory and environmental settings.

Criteria for Determining Significance

For the purposes of this analysis, the Proposed Project, reasonably foreseeable distribution components, or alternatives would result in a significant impact if they are located in or near SRAs or lands classified as VHFHSZs and one or more of the following criteria are met:

A. Substantially impair an adopted emergency response plan or emergency evacuation plan?

B. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

C. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

D. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Environmental Impacts

Proposed Project

Impact WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan – *Less than Significant with Mitigation*

Construction

While the Proposed Project would not be located in an SRA or on lands classified as a VHFHSZ, the proposed Estrella Substation and a portion of the new 70 kV power line segment are located adjacent to an SRA classified as an HFHSZ south of Union Road. As described in Section 4.9, "Hazards and Hazardous Materials," construction activities such as transport of vehicles and equipment into and out of the construction areas, off-hauling of material, and occasional operation of construction vehicles and equipment on public roadways have the potential to disrupt traffic flow along roads adjacent to or along the Proposed Project components/alignment. This disruption to traffic flow (e.g., congestion) and any required brief lane or road closures could impede emergency response vehicle access and movement and/or evacuation procedures in the event of a wildfire. This impact could substantially impair the ability to adequately implement the emergency response plans, goals, and policies identified in

Appendix A, including the County of San Luis Obispo Emergency Operations Plan and the Safety Elements in the County of San Luis Obispo and City of Paso Robles General Plans. Thus, Impact WF-1 is a significant impact.

Mitigation Measure TR-1 would require that the Proposed Project Applicants implement traffic control measures, including notification of emergency response agencies regarding any planned lane or road closures (refer to Section 4.17, "Transportation," for detailed discussion of the required measures). With implementation of Mitigation Measure TR-1, impacts on emergency response or emergency evacuation would be less than significant because emergency response agencies following the emergency response plans identified in Appendix A of this DEIR would be aware of accessible routes in case of a wildfire. Therefore, this impact would be **less than significant with mitigation**.

Operation

The Proposed Project would be operated remotely during the operation phase, with inspections and maintenance occurring infrequently. Once constructed, the Proposed Project would not have a permanent impact on the emergency response plans listed in Appendix A. None of the Proposed Project components would impede emergency response times by obstructing any public road right-of-way or vehicle movement. Given that the FAA has determined that the proposed 70 kV power line would not exceed FAA obstruction standards, this power line would not pose a significant hazard to aircraft that could respond to a wildfire in the SRA HFHSZ. Local residents in the area may use Union Road as an evacuation route, but the Proposed Project features would not hinder use of this road during an emergency. Therefore, this impact would be **less than significant**.

Impact WF-2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire – *Less than Significant*

As described above under Section 4.20.3, among the primary factors that impact wildfire intensity and behavior include weather (e.g., wind and humidity), fuel conditions (e.g., vegetation type and age, accumulation of dead material, etc.), and topography (e.g., steep terrain). As slope increases, the rate of wildfire spread increases. The most variable factor affecting wildfire behavior in the San Luis Obispo region is weather (City of Paso Robles 2016). Extreme weather, such as high temperatures and humidity, can lead to extreme wildfire activity. A secondary factor for the San Luis Obispo region is strong, offshore and hot winds known as the Santa Ana winds, also referred to as the Santa Lucia winds.

Construction

The Proposed Project topography ranges from relatively flat (0 to 1 percent slope) to relatively steep (greater than 50 percent slopes), with steepest grades (and the most susceptible to wildfire risks) generally occurring along the east bank of the Salinas River, along North and South River Road (i.e., along the reconductoring segments for the Proposed Project). As shown in Section 4.9, "Hazards and Hazardous Materials," the proposed substation and power line route are located near the HFHSZ; however, the proposed substation site and much of the power line route are currently developed for viticulture and devoid of brush or dry grass, reducing their ignition potential. Some parcels within 0.25 mile of the substation site are either ruderal grasslands or rangelands that, if left unmaintained under critical fire conditions

(e.g., prevailing winds, high temperatures), could present potential conditions for wildfire risks. Likewise, portions of the power line route and reconductoring segment would traverse some areas of oak woodlands, non-native grasslands, and other potentially flammable habitat types. Should construction activities occur on high-fire-risk days and during high fire danger times of the year, construction activities could result in wildfire ignition, and subsequent exposure to pollutant concentrations and/or the uncontrolled spread of wildfire.

Generally, other than initial vegetation clearing activities, Proposed Project construction activities would be confined to areas that have been cleared of vegetation, including access roads and work areas; therefore, these activities are not anticipated to exacerbate existing risks of wildfire. Vehicles and equipment would primarily use existing roads to access work areas, all of which would be cleared of brush to reduce fire potential. New access roads or access roads needing improvement would be cleared of vegetation when constructed. As discussed in Section 4.20.2, initial vegetation clearing activities would be subject to CAL FIRE Wildland Fire Management requirements included in the PRC for activities on sites with forest-, brush- or grass-covered lands, which include measures for reducing wildfire. Compliance with these requirements would reduce potential for accidental ignition of vegetative materials during the initial Proposed Project vegetation clearing activities, particularly on high fire risk days and during high fire danger times of the year.

Additionally, as described above, the Proposed Project Applicants and/or their contractors would be required to comply with the California Fire Code, including smoking only in designated areas, limiting ignition sources, and keeping appropriate fire-fighting equipment on site. Other sections of the California Fire Code would apply to any welding and hot work performed as part of the substation and power line construction. These requirements would serve to reduce ignition risks during construction activities and potentially allow for construction workers to quickly extinguish any incipient fires. Per the California Fire Code, Proposed Project construction activities also would need to provide for fire-fighting vehicle access to all construction sites, which would enable firefighters to effectively respond to and combat any fires at the construction sites.

Adherence to the above-described requirements would limit the potential for the Proposed Project to exacerbate existing conditions for wildfire risk, and reduce the potential for significant adverse impacts related to exposure to pollutant concentrations or the uncontrolled spread of wildfire. Therefore, impacts are **less than significant**.

Operation

The Proposed Project would not involve placement of people or habitable structures in areas where they would be exposed to pollutant concentrations from a wildfire. As mentioned above under Impact WF-1, once constructed, the Proposed Project would be operated remotely and no personnel would be located permanently on-site. During operation, the Proposed Project would not involve activities that would be anticipated to exacerbate wildfire risk, and thereby potentially expose residents in surrounding areas to wildfire hazards. Proposed Project operations may involve routine maintenance and repair activities involving use of internal-combustion engine construction equipment or flammable materials, but these activities would primarily be conducted within the fence line of the Estrella Substation, along maintained roadways, and within other paved areas. Routine operation and maintenance activities, per CPUC G.O. 95, would include vegetation clearing as needed to provide defensible space while

minimizing potential impacts from fires. In addition, a CAL FIRE Air Attack Base is located adjacent to the Paso Robles Municipal Airport (Figure 4.9-2), which would help ensure quick response time should a wildfire occur.

Operation of an electrified substation and new overhead 70 kV power lines in the Paso Robles area would inherently exacerbate the potential for wildfire risk above baseline conditions. With any electrified equipment, there is potential for accidental ignition of nearby vegetation, particularly during high fire hazard conditions/times of the year. Such an occurrence has potential to expose the surrounding community to pollutant concentrations and/or result in the uncontrolled spread of wildfire. In accordance with CPUC G.O. 95, the Proposed Project Applicants would be required to maintain acceptable clearances between the new/reconductored 70 kV power lines and any nearby trees or other vegetation to minimize the risk of the energized lines igniting wildfires. As noted above, the Estrella Substation would be located within an agricultural field not designated as a VHFHSZ or HFHSZ, where risk of wildfire would not be expected to be high, and the proposed 70 kV power line also would not pass through a VHFHSZ or HFHSZ. The PG&E and HWT wildfire mitigation plans would also be implemented. For these reasons, and due to the fact that the Proposed Project would not include habitable structures or occupants that could be exposed to pollutant concentrations from a wildfire, this impact would be **less than significant.**

Impact WF-3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment – *Less than Significant*

As described in Chapter 2, *Project Description*, the Proposed Project itself requires the installation and maintenance of power lines and other associated electrical infrastructure. As described under Impact WF-2, installation and maintenance of new overhead 70 kV power lines would inherently exacerbate the potential for wildfire risk above baseline conditions, particularly in those areas of the Project where the power line route is located near a HFHSZ. As described above, while Proposed Project construction activities would be primarily confined to areas that have been cleared of vegetation, and therefore, are not anticipated to exacerbate existing risks of wildfire; portions of the power line route and reconductoring segment would traverse potentially flammable habitat types such that under critical fire conditions (e.g., prevailing winds, high temperatures) installation could exacerbate potential for wildfire, resulting in significant impacts to the environment. Likewise, as described under Impact WF-2, maintenance of the power lines and associated electrical infrastructure involves use of internal-combustion engine construction equipment and/or flammable materials. While maintenance activities would primarily be conducted within roadways and other paved areas, if conducted under critical fire conditions maintenance activities could exacerbate potential for wildfire risks, resulting in significant impacts to the environment.

With any electrified equipment, there is potential for accidental ignition of nearby vegetation, particularly during high fire hazard conditions/times of the year. As described above, the Proposed Project Applicants would implement defensible space at the substation in coordination with CAL FIRE. Additionally, the Applicants would be required to maintain clearances between the power lines and vegetation per G.O. 95 requirements. Apart from the actions taken by the Applicants, which are evaluated as part of the Proposed Project, no other associated infrastructure that may exacerbate fire risk would need to be constructed or

maintained as a result of the Proposed Project. As such, this impact would be **less than significant**.

Impact WF-4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes – *Less than Significant*

The Proposed Project would not include any habitable structures and all of the Proposed Project components, including the Estrella Substation and 70 kV power line transmission structures, would be operated remotely. Thus, generally the Proposed Project, particularly construction and operation of Estrella Substation, would not expose people to risks, such as downslope or downstream flooding or landslides, post-fire slope instability, or drainage changes. While the Proposed Project's new and reconductored 70 kV power line segments would traverse lands primarily under agricultural production or undeveloped, the segments do traverse rural residential and dense residential (reconductoring segment) land uses, whereby there are residences that could potentially be exposed to post wildfire-related risks. As described in Section 4.7, "Geology, Soils, Seismicity, and Paleontological Resources," slopes and soil composition vary along the new and reconductored 70 kV power line alignments, therefore the segments traverse areas of low, moderate, and high landslide risk, as well as varying conditions susceptible to flooding or post-fire slope instability. However, none of the 70 kV power line infrastructure is located directly within the SRA or on lands designated as VHFHSZ. The SRA HFHSZ is located adjacent to the proposed Estrella Substation site (across Union Road to the south); however, the substation is not located within Tier 2 (elevated) and Tier 3 (extreme) fire threat areas.

As discussed above under Impact WF-1 and 2, with any electrified equipment, there is potential for accidental ignition of nearby vegetation, particularly during high fire hazard conditions/times of the year. Should accidental ignition of nearby vegetation occur along those areas that traverse rural residential and dense residential land uses, and subsequent post-wildfire related hazards, such as downstream flooding, landslides, runoff, post-fire slope instability, or drainage changes occur, these impacts would be considered significant. However, as described in Section 4.9, "Hazards and Hazardous Materials," the construction and operation of the Proposed Project components would not substantially increase the risk of wildfire given (1) compliance with the PRC requirements related to construction fire safety in grass- or brush-covered areas; (2) California Fire Code requirements for construction and design of facilities to allow for fire apparatus access, and (3) G.O. 95 vegetation clearance requirements. With implementation of the above-described requirements, the potential for the Proposed Project to cause people or structures to be exposed to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, would be **less than significant**.

Reasonably Foreseeable Distribution Components and Ultimate Substation Buildout

Construction of the reasonably foreseeable distribution components would involve similar activities to the Proposed Project, although on a much smaller scale. In spite of the reduced scale, some activities could impact emergency vehicle response and mobility, as well as evacuation procedures. Given that the northern new distribution line segment would be installed within the SR 46 right-of-way, construction vehicles and equipment moving into and

out of the construction site, as well as any construction activities that may require temporary closure of one lane of traffic, could impact vehicle movement in the area. Although the majority of the reasonably foreseeable distribution components would be located in the non-VHFHSZ LRA, SR 46 is a major highway that may be used by CAL FIRE vehicles and equipment to access SRAs if a wildfire were to occur. If construction activities were to hinder CAL FIRE response or evacuation of residents from SRAs in the event of a wildfire, this would be a significant impact. The equipment and facilities associated with ultimate substation buildout would primarily be placed within the fence line of the already-constructed Estrella Substation and, therefore, would not result in substantive impacts to emergency vehicle response and mobility. Note that the routes of any future additional distribution feeders and/or 70 kV power lines that could be established through ultimate substation buildout are unknown, and thus any impacts associated with these facilities are speculative and not evaluated in this DEIR.

Mitigation Measure TR-1 requires the development of a site-specific traffic control plan during construction activities, including measures to minimize vehicle travel delays and potential roadway hazards. Implementation of Mitigation Measure TR-1 for the reasonably foreseeable distribution components would reduce potential impacts to a level that is less than significant. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would not affect emergency vehicle movement/response or evacuation procedures because they would be similar in nature to existing distribution facilities in the area and would not directly affect any roadways. Therefore, impacts under significance criterion A would be **less than significant with mitigation.**

Construction and operation of the reasonably foreseeable distribution components, including installation of the 21/12 kV pad-mounted transformer, and ultimate buildout of Estrella Substation, would not be expected to substantially exacerbate wildfire risks, such that people would be exposed to pollutant concentrations from a wildfire, the uncontrolled spread of a wildfire, and/or people or structures would be exposed to significant risks (e.g., downslope or downstream flooding, landslides, post-fire slope instability, or drainage changes.) Construction and operation activities would be on a much smaller scale than that of the Proposed Project, and similar to the Proposed Project, would occur within areas under irrigated agriculture cultivation (generally a low fire risk land use) or road rights-of-way. Construction and operation activities would comply with the PRC wildland fire safety requirements for grass- and brush-covered lands, as well as the California Fire Code. Once constructed, the reasonably foreseeable distribution components and ultimate substation buildout facilities would need to comply with applicable vegetation clearance requirements (see Section 4.20.2; fire prevention standards for electric utilities) and would not be located in high fire risk areas or the SRA (apart from one pad-mounted transformer that would be located on the border of the SRA).Therefore, impacts under significance criteria B and D would be **less than significant.**

No new or additional infrastructure (e.g., roads, fuel breaks, or emergency water sources) would need to be installed or maintained as a result of the reasonably foreseeable distribution components and ultimate buildout of Estrella Substation that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. Nevertheless, the reasonably foreseeable distribution and ultimate substation buildout components themselves would inherently exacerbate the potential for wildfire risk above baseline conditions. But, as described above, compliance with existing laws and regulations related to wildfire safety would reduce these potential risks. Therefore, impacts under significance criterion C would be **less than significant.**

Alternatives

No Project Alternative

Under the No Project Alternative, no substation or 70 kV power line would be constructed or operated and there would be no change from baseline conditions. While this would result in no new potential sources of ignition from construction activities or electrified components, it would continue the status quo where the regional transmission system would be susceptible to a N-1 or N-1-1 contingency (refer to Chapter 2 for discussion). It is reasonably expected that an N-1 or N-1-1 contingency would result in the loss of power to Paso Robles for an extended period of time. Such a scenario could hinder emergency response and evacuation efforts generally and particularly if the power loss were to occur at the same time as a wildfire. No feasible mitigation would be available to address this adverse effect. Therefore, impacts under significance criterion A would be **significant and unavoidable**.

The No Project Alternative would not include any construction activities or land uses that could cause or exacerbate any wildfire risks or conditions. Additionally, the No Project Alternative would not require any additional infrastructure or potentially expose people or structures to significant risks associated with wildfire or downslope effects. As a result, **no impact** would occur under significance criteria B, C, or D.

Alternative SS-1: Bonel Ranch Substation Site

The Alternative SS-1 site is located within the SRA HFHSZ and adjacent to grassland areas and the Estrella River corridor, which could provide fuel for a wildfire. Construction of Alternative SS-1 would have roughly the same potential to disrupt traffic and impair local emergency response as the Proposed Project, as vehicles and equipment would need to access the site from Estrella Road. Given that these impacts would occur within an SRA HFHSZ area, Alternative SS-1 would have greater potential to interfere with emergency vehicle access and movement and/or evacuation procedures during a wildfire. This would be a significant impact. Implementation of **Mitigation Measure TR-1** would require the development of a site-specific traffic control plan during construction of Alternative SS-1, including measures to minimize vehicle travel delays and potential roadway hazards, and would therefore, reduce potential adverse effects to a level that is less than significant. Once operational, the substation under Alternative SS-1 would not affect emergency response or evacuation procedures. Therefore, impacts under significance criterion A would be **less than significant with mitigation.**

Should construction activities for Alternative SS-1 occur on high-fire-risk days and during high fire danger times of the year, construction activities could exacerbate existing conditions resulting in wildfire ignition and subsequent exposure to pollutant concentrations, uncontrolled spread of wildfire, and/or exposure of people or structures to significant risks, such as downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. These events would be considered a significant impact. As with the Proposed Project, construction of the substation at the Alternative SS-1 site would comply with PRC requirements for wildland fire safety in brush- or grass-covered areas, as well as California Fire Code requirements, which would minimize potential to ignite a wildfire during construction. Additionally, due to the site's location in the HFHSZ, implementation of **Mitigation Measure HAZ-1** would reduce the potential for exacerbating fire risks, and subsequent exposure to hazards and/or upsets, by requiring the preparation of a site-specific fire prevention and

management plan that addresses procedures for fire prevention during construction and operation activities. The fire prevention and management plan would include site-specific considerations for wildland fire safety during construction and operation, including design of the substation with defensible space and access for fire apparatus. With implementation of these measures, Alternative SS-1 would not substantially increase the risk of wildfire. Therefore, impacts under significance criteria B and D would be **less than significant with mitigation.**

No new roads, fire breaks, or related additional infrastructure would need to be installed or maintained as a result of Alternative SS-1. It is possible that a new emergency water supply (e.g., water tank) may be needed at the substation site, based on the outcome of the fire prevention and management plan development and coordination with CAL FIRE / County Fire Department. However, this would likely be no more than 10,000 to 20,000 gallons and could be accommodated by existing water sources in the area (see discussions in Section 4.10, "Hydrology and Water Quality"). The substation itself would be electrical infrastructure that would inherently exacerbate the potential for wildfire risk above baseline conditions and could subsequently result in temporary and ongoing impacts, which would be considered significant. But, as described above, implementation of **Mitigation Measure HAZ-1** would reduce the potential for exacerbating fire risks, and subsequent temporary or ongoing impacts to the environment. Therefore, impacts under significance criterion C would be **less than significant with mitigation.**

Alternative PLR-1A: Estrella Route to Estrella Substation

As described in Section 4.20.3, portions of the Alternative PLR-1A route directly border designated SRA HFHSZs. Alternative PLR-1A also is substantially longer than the Proposed Project 70 kV power line (approximately 6.5 miles longer). As such, there would be elevated overall wildfire hazard potential for Alternative PLR-1A compared to the Proposed Project.

Construction of Alternative PLR-1A would have potential to interfere with emergency vehicle access and movement and/or evacuation procedures during a wildfire such that local emergency response plans may be impaired. Construction vehicles and equipment may need to operate within public roadways and temporary lane or road closures are possible along the Alternative PLR-1A route. This disruption to traffic flow (e.g., congestion) and any required brief lane or road closures could impede emergency response vehicle access and movement and/or evacuation procedures in the event of a wildfire. This impact could substantially impair the ability to adequately implement the emergency response plans, goals, and policies identified in Appendix A, resulting in a significant impact. Implementation of **Mitigation Measure TR-1** would reduce these potential adverse effects to a level that is less than significant because emergency response agencies would be notified of any planned lane or road closures and would be able to identify accessible routes in case of a wildfire in advance of the approved project. Once operational, the 70 kV power line under Alternative PLR-1A would not be expected to affect emergency response or evacuation procedures. As discussed in Section 4.9, "Hazards and Hazardous Materials," the Alternative PLR-1A 70 kV power line would not conflict with FAA regulations and would not be expected to interfere with movement of CAL FIRE aircraft. Therefore, impacts under significance criterion A would be **less than significant with mitigation.**

Should Alternative PLR-1A construction activities occur on high-fire-risk days and during high fire danger times of the year, construction activities could exacerbate existing conditions resulting in wildfire ignition and subsequent exposure to pollutant concentrations, uncontrolled spread of

wildfire, and/or exposure of people or structures to significant risks, such as downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. These events would be considered a significant impact. This is particularly true for portions of the Alternative PLR-1A route that would border the HFHSZ. As with the Proposed Project, construction of the 70 kV power line would comply with PRC requirements for wildland fire safety in brush- or grass-covered areas, as well as California Fire Code requirements, which would minimize potential to ignite a wildfire during construction. Additionally, since portions of Alternative PLR-1A directly border on/occur within the HFHSZ, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a fire prevention and management plan. The fire prevention and management plan would include site-specific considerations for wildland fire safety during construction and operation, including management of vegetation to ensure compliance with G.O. 95 clearance requirements. With implementation of these measures, Alternative PLR-1A would not substantially increase the risk of wildfire over baseline conditions. Additionally, the power line under Alternative PLR-1A would be operated remotely and would not place structures or people in areas where they could be exposed to pollutant concentrations from a wildfire or significant downslope or downstream flooding or landslides affects. Therefore, impacts under significance criteria B and D would be **less than significant with mitigation.**

No new or additional infrastructure (e.g., roads, fuel breaks, or emergency water sources) would need to be installed or maintained as a result of Alternative PLR-1A. The power line itself is associated electrical infrastructure that would inherently exacerbate the potential for wildfire risk above baseline conditions. Wildfire ignition could subsequently result in temporary and ongoing impacts, which would be considered significant. But, as described above, compliance with existing laws and regulations related to wildfire safety and implementation of **Mitigation Measure HAZ-1** would reduce the potential for exacerbating fire risks, and subsequent temporary or ongoing impacts to the environment. Therefore, impacts under significance criterion C would be **less than significant with mitigation.**

Alternative PLR-1C: Estrella Route to Bonel Ranch, Option 1

Alternative PLR-1C would be similar in length and would follow a similar route as Alternative PLR-1A, including bordering the SRA HFHSZ along portions of Wellsona Road. The Alternative PLR-1C route would also pass through the HFHSZ in exiting the Bonel Ranch Substation site and the Alternative PLR-1C Minor Route Variation 1 would border the HFHSZ along Estrella Road. As such, the alternative would have elevated overall wildfire hazard potential compared to the Proposed Project.

Construction of Alternative PLR-1C would have potential to interfere with emergency vehicle access and movement and/or evacuation procedures during a wildfire such that local emergency response plans may be impaired. Construction vehicles and equipment may need to operate within public roadways and temporary lane or road closures are possible along the Alternative PLR-1C route. This disruption to traffic flow (e.g., congestion) and any required brief lane or road closures could impede emergency response vehicle access and movement and/or evacuation procedures in the event of a wildfire. This impact could substantially impair the ability to adequately implement the emergency response plans, goals, and policies identified in Appendix A, resulting in a significant impact. Implementation of **Mitigation Measure TR-1** would reduce these potential adverse effects to a level that is less than significant because emergency response agencies would be notified of any planned lane or road closures and would be able to

identify accessible routes in case of a wildfire in advance of the approved project. Once operational, the 70 kV power line under Alternative PLR-1C would not be expected to affect emergency response or evacuation procedures. As discussed in Section 4.9, "Hazards and Hazardous Materials," the Alternative PLR-1C 70 kV power line would not conflict with FAA regulations and would not be expected to interfere with movement of CAL FIRE aircraft. Therefore, impacts under significance criterion A would be **less than significant with mitigation.**

Should Alternative PLR-1C construction activities occur on high-fire-risk days and during high fire danger times of the year, construction activities could exacerbate existing conditions resulting in wildfire ignition and subsequent exposure to pollutant concentrations, uncontrolled spread of wildfire, and/or exposure of people or structures to significant risks, such as downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. These events would be considered a significant impact. This is particularly true for portions of Alternative PLR-1C route that would directly border on/occur within the HFHSZ. As with the Proposed Project, construction of the 70 kV power line would comply with PRC requirements for wildland fire safety in brush- or grass-covered areas, as well as California Fire Code requirements, which would minimize potential to ignite a wildfire during construction. Additionally, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a fire prevention and management plan. The fire prevention and management plan would include site-specific considerations for wildland fire safety during construction and operation, including management of vegetation to ensure compliance with G.O. 95 clearance requirements. With implementation of these measures, Alternative PLR-1C would not substantially increase the risk of wildfire over baseline conditions. Additionally, the power line under Alternative PLR-1C would be operated remotely and would not place structures or people in areas where they could be exposed to pollutant concentrations from a wildfire or significant downslope or downstream flooding or landslides affects. Therefore, impacts under significance criteria B and D would be **less than significant with mitigation.**

No new or additional infrastructure (e.g., roads, fuel breaks, or emergency water sources) would need to be installed or maintained as a result of Alternative PLR-1C. The power line itself is electrical infrastructure that would inherently exacerbate the potential for wildfire risk above baseline conditions. Wildfire ignition could subsequently result in temporary and ongoing impacts, which would be considered significant. But, as described above, compliance with existing laws and regulations related to wildfire safety and implementation of Mitigation Measure HAZ-1 would reduce the potential for exacerbating fire risks, and subsequent temporary or ongoing impacts to the environment. Therefore, impacts under significance criterion C would be **less than significant with mitigation**.

Alternative PLR-3: Strategic Undergrounding (Both Options)

As described in Section 4.20.3, Alternative PLR-3 (both Option 1 & 2) would be located within the non-VHFHSZ LRA, although portions of this area may still be susceptible to wildfire. Of the alternatives under consideration, Alternative PLR-3 would have the greatest potential for traffic impacts due to the extended lane closures that would be required along the routes to conduct trenching and related activities. Extended lane closures and related traffic impacts could impair the ability to adequately implement emergency response plans, goals, and policies identified (see Appendix A), resulting in a significant impact. However, given that Alternative PLR-3 is not located within the SRA or a VHFHSZ, the potential for substantive impacts to emergency vehicle response to wildfire or evacuation procedures would be considered less than significant.

Implementation of **Mitigation Measure TR-1** would further reduce the impacts of Alternative PLR-3 on transportation and traffic, including emergency vehicle movement and evacuation procedures, although this mitigation measure is not considered necessary to reduce the impact under significance criterion A due to the alternative's location outside the SRA. Once operational, the 70 kV power line under Alternative PLR-3 would be almost entirely underground and would not affect emergency response or evacuation procedures. Therefore, impacts under significance criterion A would be **less than significant.**

Should Alternative PLR-3 construction activities occur on high-fire-risk days and during high fire danger times of the year, construction activities could exacerbate existing conditions resulting in wildfire ignition and subsequent exposure to pollutant concentrations, uncontrolled spread of wildfire, and/or exposure of people or structures to significant risks, such as downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. These events would be considered a significant impact. As with the Proposed Project, construction of Alternative PLR-3 would comply with PRC requirements for wildland fire safety in brush- or grass-covered areas, as well as California Fire Code requirements, which would minimize potential to ignite a wildfire during construction. Implementation of these measures would reduce potential wildfire hazards during construction to a level that is less than significant. The above-ground electrified components at the transition stations would be subject to G.O. 95 vegetation clearance requirements. Additionally, the power line under Alternative PLR-3 would be operated remotely and would not place structures or people in areas where they could be exposed to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, and/or significant downslope or downstream flooding or landslides affects and post-wildfire-related hazards. Therefore, impacts under significance criteria B and D would be **less than significant.**

No new or additional infrastructure (e.g., roads, fuel breaks, or emergency water sources) would need to be installed or maintained as a result of Alternative PLR-3. The power line itself would be electrical infrastructure that would inherently exacerbate the potential for wildfire risk above baseline conditions; however, this risk would be substantially reduced compared to the Proposed Project 70 kV power line, since the majority of the electrified components would be underground for Alternative PLR-3. As described above, compliance with existing laws and regulations related to wildfire safety would reduce the potential for exacerbating fire risks, and subsequent temporary or ongoing impacts to the environment. Therefore, impacts under significance criterion C would be **less than significant.**

Alternative SE-1A: Templeton Substation Expansion – 230/70 kV Substation

The Templeton Substation Expansion Site is located entirely within the SRA HFHSZ and surrounding areas include grasslands and oak woodland, which could provide fuel for a wildfire. Similar to the Proposed Project, construction of Alternative SE-1A has potential to disrupt traffic, as vehicles and equipment would need to access the site from El Pomar Road, and therefore could obstruct the response of emergency vehicles and implementation of evacuation procedures, which would be considered a significant impact. Given that these impacts would occur within an SRA HFHSZ area, Alternative SE-1A would have greater potential to interfere with emergency vehicle access and movement and/or evacuation procedures during a wildfire. Implementation of **Mitigation Measure TR-1** for Alternative SS-1 would require the development of a site-specific traffic control plan during construction, including measures to minimize vehicle travel delays and potential roadway hazards; and would, therefore reduce

potential adverse effects to a level that is less than significant. Once operational, the substation under Alternative SE-1A would not affect emergency response or evacuation procedures. Therefore, impacts under significance criterion A would be **less than significant with mitigation.**

Should Alternative SE-1A construction activities occur on high-fire-risk days and during high fire danger times of the year, construction activities could exacerbate existing conditions resulting in wildfire ignition and subsequent exposure to pollutant concentrations, uncontrolled spread of wildfire, and/or exposure of people or structures to significant risks, such as downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. These events would be considered a significant impact. As with the Proposed Project, construction of the substation at the Alternative SE-1A site would comply with PRC requirements for wildland fire safety in brush- or grass-covered areas, as well as California Fire Code requirements, which would minimize potential to ignite a wildfire during construction. Additionally, as the Alternative SE-1A site is located in the HFHSZ, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a fire prevention and management plan. The fire prevention and management plan would include site-specific considerations for wildland fire safety during construction and operation, including design of the substation with defensible space and access for fire apparatus. With implementation of these measures, Alternative SE-1A would not substantially increase the risk of wildfire. Additionally, the substation at the Alternative SE-1A site would be operated remotely and would not place structures or people in areas where they could be exposed to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, and/or significant downslope or downstream flooding or landslides affects and post-wildfire-related hazards. Therefore, impacts under significance criteria B and D would be **less than significant with mitigation.**

No new roads, fire breaks, or related additional infrastructure would need to be installed or maintained as a result of Alternative SE-1A. It is possible that a new emergency water supply (e.g., water tank) may be needed at the substation site, based on the outcome of the fire prevention and management plan development and coordination with CAL FIRE / County Fire Department. However, this would likely be no more than 10,000 to 20,000 gallons and could be accommodated by existing water sources in the area (see discussions in Section 4.10, “Hydrology and Water Quality”). The substation itself would be electrical infrastructure that would inherently exacerbate the potential for wildfire risk above baseline conditions and could subsequently result in temporary and ongoing impacts, which would be considered significant. Compliance with existing laws and regulations related to wildfire safety and implementation of **Mitigation Measure HAZ-1** would reduce the potential for exacerbating fire risks, and subsequent temporary or ongoing impacts to the environment Therefore, impacts under significance criterion C would be **less than significant with mitigation.**

Alternative SE-PLR-2: Templeton-Paso South River Road Route

The majority of the length of the Alternative SE-PLR-2 route would be within the designated SRA HFHSZ. This area has rural residential development and grassland and oak woodland areas, as well as moderate to steep topography, all of which increase potential wildfire hazards. Similar to the Proposed Project, construction of Alternative SE-PLR-2 would have potential to interfere with emergency vehicle access and movement and/or evacuation procedures during a wildfire such that local emergency response plans may be impaired. Construction vehicles and equipment may need to operate within public roadways and temporary lane or road closures

are possible along the Alternative SE-PLR-2 route. Temporary lane and road closures and other related interference by construction vehicles and equipment would be considered a significant impact if these activities were to substantially impair emergency response or evacuation within the SRA. Implementation of **Mitigation Measure TR-1** would reduce these potential adverse effects to a level that is less than significant. Once operational, the 70 kV power line under Alternative SE-PLR-2 would not be expected to affect emergency response or evacuation procedures. Therefore, impacts under significance criterion A would be **less than significant with mitigation.**

Should Alternative SE-PLR-2 construction activities occur on high-fire-risk days and during high fire danger times of the year, construction activities could exacerbate existing conditions resulting in wildfire ignition and subsequent exposure to pollutant concentrations, uncontrolled spread of wildfire, and/or exposure of people or structures to significant risks, such as downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. These events would be considered a significant impact. As with the Proposed Project, construction of the 70 kV power line under Alternative SE-PLR-2 would comply with PRC requirements for wildland fire safety in brush- or grass-covered areas, as well as California Fire Code requirements, which would minimize potential to ignite a wildfire during construction. Additionally, due to Alternative SE-PLR-2's location within the HFHSZ, **Mitigation Measure HAZ-1** would be implemented, which would require preparation and implementation of a fire prevention and management plan. The fire prevention and management plan would include site-specific considerations for wildland fire safety during construction and operation, including management of vegetation to ensure compliance with G.O. 95 clearance requirements. With implementation of these measures, Alternative SE-PLR-2 would not substantially increase the risk of wildfire over baseline conditions. Additionally, the power line under Alternative PLR-1C would be operated remotely and would not place structures or people in areas where they could be exposed to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, and/or expose people or structures to significant downslope or downstream flooding, landslide affects, and post-wildfire-related hazards. Therefore, impacts under significance criteria B and D would be **less than significant with mitigation.**

No new or additional infrastructure (e.g., roads, fuel breaks, or emergency water sources) would need to be installed or maintained as a result of Alternative SE-PLR-2. The power line itself would be electrical infrastructure that would inherently exacerbate the potential for wildfire risk above baseline conditions and could subsequently result in temporary and ongoing impacts, which would be considered significant. Compliance with existing laws and regulations and implementation of **Mitigation Measure HAZ-1** would reduce the potential for exacerbating fire risks, and subsequent temporary or ongoing impacts to the environment. Therefore, impacts under significance criterion C would be **less than significant with mitigation.**

Alternative BS-2: Battery Storage to Address Distribution Need

Looking at the illustrative FTM BESS sites, Sites 6 and 8 are located within the SRA HFHSZ; while the remaining sites are located within the non-VHFHSZ LRA. For those sites located within the SRA, construction activities for Alternative BS-2 could affect traffic flow, and thereby, could potentially impact emergency vehicle movement and access and/or evacuation procedures during a wildfire such that local emergency response plans may be impaired. It is assumed that encroachment permits would be obtained for any construction activities under Alternative BS-2

that may substantially impact the roadway. Once operational, FTM facilities under Alternative BS-2 would not be anticipated to affect emergency response or evacuation procedures.

Should construction of the BESS at FTM sites occur on high-fire-risk days and during high fire danger times of the year, activities could exacerbate existing conditions resulting in wildfire ignition and subsequent exposure to pollutant concentrations, uncontrolled spread of wildfire, and/or exposure of people or structures to significant risks. Significant risks include downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. However, as with the Proposed Project, it is assumed that construction methods, practices, and design specifications would comply with PRC requirements for wildland fire safety in brush- or grass-covered areas, as well as California Fire Code requirements, which would serve to minimize ignition potential and related wildfire risks. Once constructed, BESSs (in particular, lithium-ion BESSs) may present a fire risk, particularly for FTM sites located within the SRA, such as the illustrative FTM Sites 6 or 8. UL 9540 is a safety standard specifically designed for electrochemical BESSs and includes, among other things, size and separation requirements to prevent a fire originating in one BESS unit from propagating to adjacent units (i.e., thermal runaway) (UL LLC 2020). Implementation of this standard, along with compliance with local laws and regulations for fire safety, would reduce potential impacts from BESSs related to fire risk. Further, FTM BESSs under Alternative BS-2 would be operated remotely and, therefore, these facilities would not expose structures or people to pollutant concentrations from a wildfire, uncontrolled spread of wildfire, and/or expose people or structures to significant downslope or downstream flooding, landslide affects, and post-wildfire-related hazards.

No new roads, fire breaks, or related additional infrastructure would need to be installed or maintained as a result of Alternative BS-2. The BESS facilities themselves would be electrical infrastructure that would inherently exacerbate the potential for wildfire risk above baseline conditions**.** It is assumed that compliance with all applicable local laws and regulations for fire safety would reduce potential impacts from BESSs to exacerbate fire risks, and temporary or ongoing impacts to the environment.

Overall, FTM BESS sites were selected for illustrative purposes only, BESS installations have not been designed and technologies have not been selected, and the specifics of Alternative BS-2 are unknown. Thus, project-level determinations cannot be made as impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is provided for any of the significance criteria.

Alternative BS-3: Third Party, Behind-the-Meter Battery Solar and Battery Storage

The specific locations of development sites under Alternative BS-3 are not yet known. However, it is anticipated that BTM solar and battery storage facilities would be located primarily within or on existing commercial, industrial, and residential buildings in the Paso Robles area. As such, these facilities would have little potential to adversely affect emergency response or evacuation plans and procedures. Given the relatively small scale of construction activities for individual BTM solar systems and BESSs, Alternative BS-3 would not substantially impair emergency response or evacuation procedures.

Construction/installation of individual BTM BESSs under Alternative BS-3 would be required to comply with the California Fire Code. Additionally, for any BTM facilities that may be installed on unused portions of properties that may include brush- or grass-covered areas, these

construction activities would need to comply with PRC requirements for wildland fire safety. Compliance with these existing laws and regulations would reduce potential for construction of BTM solar systems and BESSs to substantially increase the risk of wildfire or an accidental ignition. As discussed in Section 4.9, "Hazards and Hazardous Materials," BTM solar systems and BESSs do have some potential to increase fire hazard during operation. It is assumed that all applicable local codes and requirements would be followed for the permitting, siting, and installation of third-party BTM installations that may result from procurement via the DIDF. No new or additional infrastructure (e.g., roads, fuel breaks, or emergency water sources) would likely need to be installed or maintained as a result of Alternative BS-3.

Overall, due to the fact that specific locations and characteristics of BTM resources procured under Alternative BS-3 are unknown at this time, project-level impact determinations are not possible as the impacts are speculative. Therefore, consistent with CEQA Guidelines Section 15145, no significance conclusion is reached under any of the significance criteria.