



Santa Clara Valley Audubon Society
Founded 1926

February 5, 2003

Billie Blanchard,
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 800
San Francisco, CA 94104-2906.

Re: In support of Undergrounding Alternative 1B for PG&E Jefferson-Martin 230 kv Transmission Line Project.

Dear Sir/Madam,

On behalf of myself and the 4000 members of the Santa Clara Valley Audubon Society, I write this with reference to the proposed PG&E transmission line from the Jefferson Substation (at the southern edge of Edgewood County Park and Natural Preserve) to the Martin Substation. PG&E proposes to underground the northern 12-mile part of this line, eliminating the need for building towers. We think this is an ecologically sound and commendable idea. But the company proposes to build the 14.7-mile southern part of the line from Jefferson Substation to San Bruno above ground, pulling down a hundred existing towers (80 to 100 ft. high) and building new ones (95-150 ft.) in their place. This is a deplorable idea, since these new towers will destroy the visual beauty of the watershed and damage the habitat of the wildlife situated near them, including the threatened Bay checkerspot butterfly. The construction of these higher towers would necessarily require wider foundations, more land for access for construction equipment, for the excavated material, and so forth. All this activity is sure to damage the habitat of the species mentioned above.

Installing some of these towers by helicopter to reduce the impact of construction activity and machinery on the wildlife in the area eliminates only some of the harmful impact. The land requirement is the same, the problem of disposing the excavated material remains the same.

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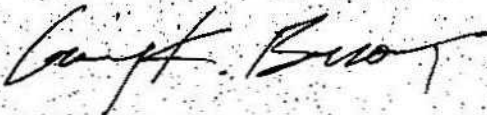
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The only sound alternative to this is Alternative 1B-- to make the southern portion of the proposed 27-mile transmission line also underground. If it is feasible for the PG&E to underground the northern portion of the project from San Bruno to Brisbane beneath city streets, it should be equally feasible to construct the southern segment that runs through the watershed also underground. This makes excellent ecological sense, and is much preferable to building the lines above ground. We are not against the project as such, but we would like it to be executed with the least adverse impact on the environment.

We request you to consider the facts and suggestions detailed above, and ensure that the PG&E, while constructing the new transmission line, **undergrounds all of it-- the northern as well as the southern segments.**

We do hope this wonderful opportunity to protect sensitive habitat and restore the visual beauty of the watershed by removing the towers altogether will not be lost. Thank you for considering our views on this vital matter.

Sincerely yours,



Craig K. Breon
Executive Director