



FRIENDS OF EDGEWOOD NATURAL PRESERVE

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2003
Board of
Directors

John
Allen

February 14, 2003

Toni
Corelli

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

Katherine
Greene

Peter
Ingram

Regarding: Jefferson-Martin 230 kV Transmission Line Project Proposed by Pacific Gas & Electric Company (Appl. No. A-02-09-043)

Bill
Korbholz

Kathy
Korbholz

To Whom It May Concern,

Bob
Young

I am writing on behalf of the Friends of Edgewood, a volunteer group of more than 200 families, which devotes in excess of 2000 hours per year to fulfilling its mission of **"Preserving Edgewood for the Human, Plant, and Animal Generations to Come"**. The Friends of Edgewood came into existence 10 years ago when Edgewood County Park was officially designated a Natural Preserve. Many of those who fought to save Edgewood from becoming a golf course became its founding members. In addition, we work with the California Native Plant Society and San Mateo County Parks staff to remove invasive weeds threatening the diverse and fragile environment that makes Edgewood so unique. In 2002, volunteers spent an additional 2100 hours removing well over 300,000 weeds from Edgewood.

Edgewood Natural Preserve is noted for its diverse habitats, its serpentine grasslands, and its outstanding spring wildflower displays. In just 467 acres, about 1 square mile, it has almost 500 plant species. In serpentine grasslands, like those in Edgewood, visitors can get a glimpse of how California wild lands looked before the Europeans settled and brought non-native feed grasses to support their cattle. Relatively rare serpentine areas like Edgewood provide a window to our past vistas. The few that still exist must be preserved.

Speaking from the deep commitment the Friends feel toward Edgewood Natural Preserve, I would like to ensure the following points are addressed in the upcoming Environmental Impact Report.

First, the rare, threatened and endangered species in Edgewood Natural Preserve must be protected. Any work performed in Edgewood and on land adjacent to Edgewood must leave them undisturbed. These species are so fragile that any disturbance to their habitat could have a devastating impact on their survivability. A qualified conservation biologist with local knowledge of Edgewood and its special status species should be engaged as part of the EIR process to assess the impacts on these species of any proposed work. Mitigation must be planned and funded for any unavoidable deleterious effects.

The existing and proposed power lines run through sensitive habitat that was officially designated Critical Habitat for the federally threatened Bay Checkerspot Butterfly

(*Euphydryas editha bayensis*). An endangered flowering plant, called the white-rayed pentachaeta (*Pentachaeta bellidiflora*) is found only at Edgewood and on a small piece of San Francisco Watershed land known locally as the "triangle". (Highway 280, Canada Road, Edgewood Road, bound the area.) **This plant is found nowhere else in the world!** There are two other federally threatened or endangered plants, the San Mateo thornmint (*Acanthomintha duttonii*) and the Marin western flax (*Hesperolinon congestum*). In addition, there are nine other plant and animal species of concern within Edgewood's boundaries. Their individual life cycles must be respected and their habitats must be protected.


Second, soil compaction in sensitive areas must be avoided. Because of the thin, low-nutrient soil in serpentine grassland, soil compaction is a real threat to the plants and animals living there. Bringing in heavy equipment, workmen, and/or staging materials will have a detrimental affect on the critical habitat on which the special status species depend. The amount of ground level work needed to rebuild or extend the existing towers to handle the 230kV line and to expand the right-of-way as described from 50 to 100 feet wide cannot be tolerated by either this sensitive habitat or its protected species. Impacts from previous intrusions are still evident, even after many, many years.

Third, soil disturbance in Edgewood must be avoided. Weeds love disturbed soil. That is why they often line roadways and dot construction sites. Digging trenches or digging out existing concrete footings are invitations for infestations of invasive weeds. Once rooted, they push out native plants and eventually the animals that depend on them. Their impact can be seen for years. Please see the attached picture, taken in the "triangle," which shows the obvious weed infestation directly along the underground gas pipeline. The trench to install this pipeline was excavated more than 50 years ago and its disturbed soil still provides attractive habitat for invasive weeds!

Finally, The Friends of Edgewood recommend removing the existing 60 kV line that runs within Edgewood's perimeter, and undergrounding it, along with the proposed new 230 kV line beneath the Cañada road right of way. We believe this modification to Segment 1B – Underground Route Alternative (Cañada) would be esthetically more pleasing and would avoid future intrusion into this sensitive area for maintenance and/or replacement of power line equipment. The Friends of Edgewood recommends removing the existing towers by helicopter. Further we suggest leaving the concrete footings in place. Digging them out would disturb the soil too much and invite far too many weeds.

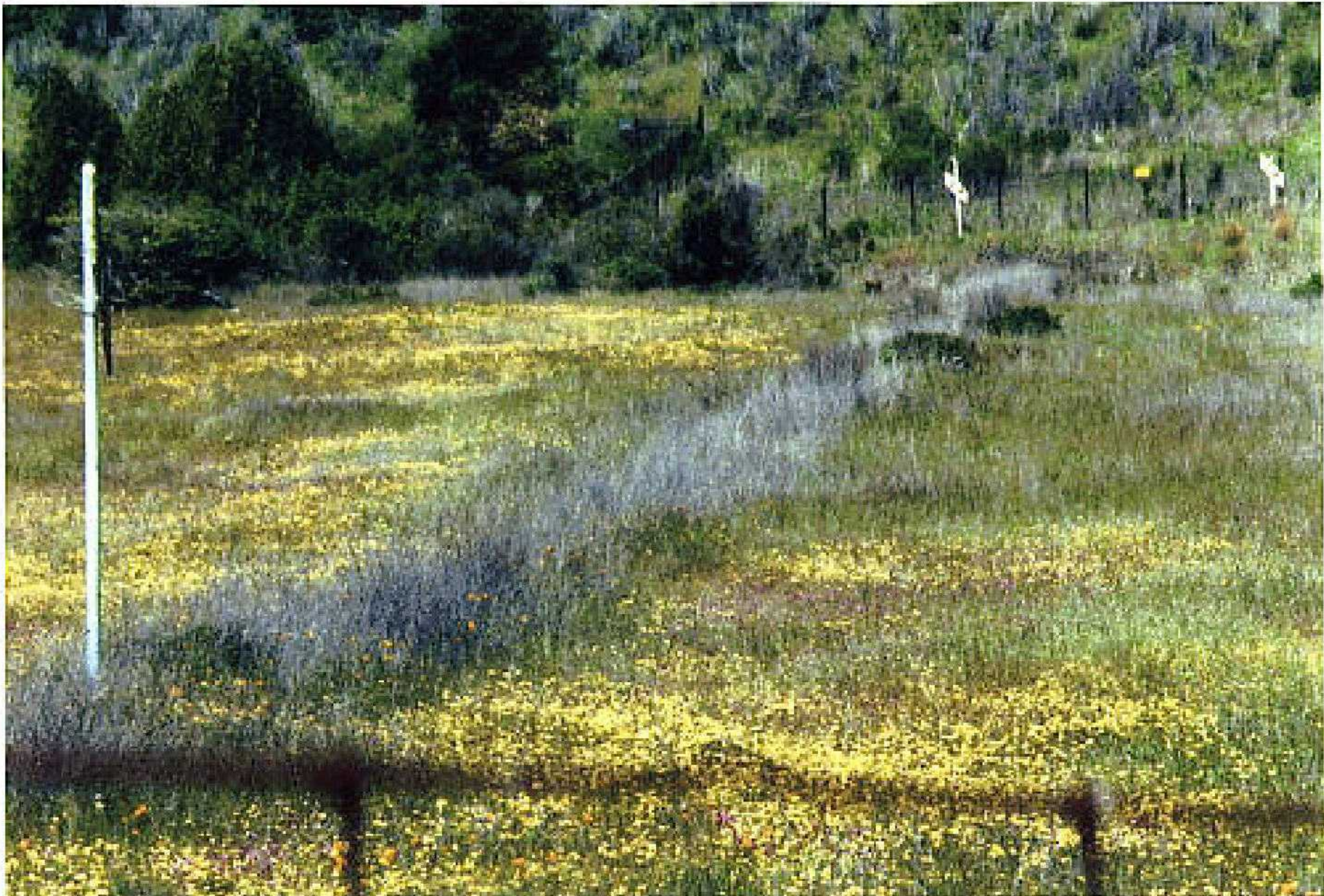
Thank you for your consideration of the important steps that must be taken to protect this fragile habitat. With your attention to these key points we can preserve Edgewood for the human, plant, and animal generations to come.

Sincerely,



Kathy Korbholz
President, Friends of Edgewood

cc: Committee For Green Foothills



YST Along 50-Year Old Gas Pipeline

May, 2000