



Scott T. Munns, P.E.  
Public Works Director

PWD-2003-010

February 24, 2003

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

Subject: Jefferson-Martin 230 KV Transmission Line Project Notice of Preparation  
Application No. A-02-09-043

Dear Ms. Blanchard:

I am writing on behalf of the City of San Bruno regarding the subject project in my capacity as Public Works Director. We understand that the CPUC is soliciting input for scoping the Environmental Impact Report. We are concerned that some of the statements attributed to the City of San Bruno in the Proponent's Environmental Assessment are inaccurate and do not correctly represent the views of the City of San Bruno. Examples of these are as follows:

- Pg 3-10 "PG&E performed a site review and had discussions with local government officials concerning the Caltrans site and determined that this site best serves the Project's needs."
  - Comment--While the City had some preliminary meetings regarding this proposed project with PG&E staff during the summer of 2002, the City did not in any way support the use of the vacant Caltrans property on the northeast corner of Skyline Boulevard and San Bruno Avenue. In fact, the City would like to go on record that we do not want the Transition Station located there. The nearby land use is residential, and the Transition Station is incompatible with the residential character of the neighborhood. San Mateo County has also proposed a public parking area at this location for their open space trailhead located across Skyline Boulevard.
- Pg 3-17 & 18 "Further, the Route Option 2B is more compatible with the development planning strategy for the City of San Bruno, which has requested that PG&E use the Route 2B as opposed to running the line via El Camino Real."
  - Comment--Route 2B was not recommended by the City of San Bruno. The City only expressed concern about construction on El Camino Real. The City is in fact opposed to Route 2B. The City believes there are better alternatives than this route proposed by PG&E.

Caltrain and the CPUC are proposing a grade separation on San Bruno Avenue at the Caltrain crossing near Huntington Avenue. The Huntington Avenue/San Bruno Avenue intersection pavement surface will be depressed significantly. Only minimal clearance will exist between the top of BART's subway box and the roadway surface in this area, making construction of a new 230 KV transmission system extremely difficult if not impossible.

In addition, there are many existing utilities in Huntington Avenue, all of which must be lowered to accommodate construction of the grade separation. This includes an existing PG&E 230KV facility and a 16-inch PG&E gas transmission main located on the west side of Huntington Avenue.

You should also be aware that the proposed grade separation project is slated for construction on the same schedule as the proposed 230KV project, posing significant construction coordination and traffic control issues on one of the City's busiest thoroughfares. It would also seem unwise to locate both 230KV lines within the same busy utility corridor, if system redundancy in the event of damage or a major catastrophe is deemed to be of any importance.

The City requests additional routing studies be performed through San Bruno. The City would also prefer that the Transition Station be relocated. We suggest a site on the west side of Skyline Boulevard away from the residential areas. The 230KV underground construction should then cross Skyline Boulevard underground.

Three other possible routes through San Bruno that we recommend be evaluated and studied further include:

- A. Beginning at a Transition Station on the west side of Skyline Boulevard; then crossing Skyline and proceeding down San Bruno Avenue to the edge of the open space west of MP 15; then traversing to the northeast through undeveloped land connecting into Sneath Lane near I-280; then continuing east on Sneath to Huntington Avenue near the BART parking garage; and then proceeding north along the BART R/W as indicated in segment 2B of PG&E's Environmental Assessment.
- B. Beginning at a Transition Station on the west side of Skyline Boulevard; then crossing Skyline and proceeding down San Bruno Avenue to the exit/entrance ramp of I-280; then along the northbound ramp north to Sneath Lane (Although the ramp is part of the freeway, it is significantly separated from the freeway, and there appears to be ample space for construction of the 230KV line. Caltrans may grant a variance for this alignment); then continuing east on Sneath to Huntington Avenue near the BART parking garage; and then proceeding north along the BART R/W as indicated in segment 2B of PG&E's Environmental Assessment.
- C. Beginning at a Transition Station on the west side of Skyline Boulevard; then crossing Skyline and proceeding down San Bruno Avenue to Cherry Avenue; then north on Cherry to Sneath lane; then continuing east on Sneath to Huntington Avenue near the BART parking garage; and then proceeding north along the BART R/W as indicated in segment 2B of PG&E's Environmental Assessment.

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We further request that the following issues be considered when developing the Environmental Impact Report:

- San Mateo County has also proposed the site of the proposed Transition Station as a trailhead parking area. Using the site for the Transition Station would eliminate a parking site for this recreational use that is held in high value by the community. The City prefers to retain the site for the use of the trailhead. The report should address what other locations are available for a trailhead parking facility if the Transition Station is to be constructed as proposed.
- If the PUC continues to consider the existing Transition Station site, facilities must also be located such that any future widening of Skyline Boulevard will not be impacted.
- The City has developed Master Plans for its utilities and roadways. Describe how the proposed project would impact those facilities. Describe how the 230KV project would be adjusted and/or relocated by PG&E to allow for future construction of City facilities and infrastructure improvements.
- The City prefers not to have the proposed 230KV line located under the City's street pavement on San Bruno Avenue due to proximity to other existing or proposed City utility improvements. Please include an investigation into whether or not the 230KV line could be placed within the landscaped median or roadway shoulder areas.
- The typical roadway sections for the 230KV Environmental Assessment do not meet City standards. Discuss what steps will be taken to address city standards if the proposed underground system uses City streets.
- Provide a detailed analysis of each location in the City where splice vaults will be proposed.
- There are a number of discussions in the Environmental Assessment about avoiding crossing the earthquake fault. However, the proposed Transition Station facility is located adjacent to the San Andreas fault, and the entire area around this proposed facility appears to be in a seismically active zone. Please review the impacts of locating the Transition Station facility in an active fault zone. Also, discuss how an underground transmission line can safely cross the fault.

The City would like to work closely with the CPUC during the environmental process. Since the City sees many difficulties with the project, we wish to be involved as the various studies that may affect any portion of San Bruno are prepared. The City will also wish to comment on the final EIR.

If you have any questions regarding this letter of comments, please coordinate with Rick Cole, the City's project consultant, who can be contacted at (925) 787-9120.

Sincerely,



Scott T. Munns, P.E.  
Public Works Director

Cc: Frank Hedley, City Manager  
Steve Rogers, Assistant City Manager  
Pamela Thompson, City Attorney  
George Foscardo, Community & Economic Development Director  
Merrill Buck, Deputy Public Works Director, A&E  
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