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Via E-Mail (jeffmartin@AspenEG.com) and U.S. Mail

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

Re: Jefferson-Martin 230 kV Transmission Line Project (Application No. A-02-09-043)

Dear Ms. Blanchard:

On behalf of the County of San Mateo, we would like to submit the following comments and questions in response to the Notice of Preparation for the above mentioned project. County staff appreciated the opportunity to meet with you and Susan Lee of Aspen Environmental Group on January 30, 2003 to discuss the project. As we mentioned, the Board of Supervisors for the County of San Mateo has not taken a position on the proposed project. County staff are still reviewing the proposal to determine effects on the County and County interests. To that end, staff needs additional information, including more explicit mapping and details of the proposed route and feasible alternative routes. We anticipate that the environmental review that you are conducting on behalf of the California Public Utilities Commission (CPUC) will assist us considerably in reviewing potential impacts to the County.

Comments and Questions from County Parks and Recreation Division:

1. Can detailed maps be prepared that show County Park property boundaries, unincorporated jurisdiction boundaries and County Public Works right of way?
2. Why is the Utility Easement through Edgewood proposed to be expanded from 50 to 100 feet?
3. If the Utility Easement is increased, how will that constrain County Parks to be able to manage the habitat for the Bay Checkerspot butterfly (i.e., controlled burns)?
4. Will increasing the Utility Easement increase area of potential site disturbance?

5. Given the potential for environmental impacts to Federally listed Rare and Endangered plants and the Bay Checkerspot butterfly at Edgewood Park, is there another environmentally superior feasible alternative that avoids Edgewood Park and still meets the Project's requirements instead of P.G.&E.'s current proposal?

6. If Alternative 1B was chosen, would the existing towers be removed from Edgewood to minimize site disturbance and how would that be done?

7. If power lines are undergrounded along the Guadalupe Park Expressway on San Bruno Mountain would an HCP Amendment be required?

8. Where would staging areas be proposed for undergrounding utilities under the Guadalupe Park Expressway? It would be preferable to perform work within the right of way and not on County Park property.

9. Are there plans for either an informal or formal consultation with U.S. Fish and Wildlife Services regarding potential impacts to protected species at Edgewood Park? If so, may the County Parks Division be included in that discussion?

Comments and Questions from County Real Property:

10. County Real Property is currently reviewing the proposed routes for potential impacts on County owned and leased property. Staff has identified approximately 26 Assessor Parcels (APN) of County owned property that were listed as being within 300 feet of the current proposed route. A copy of that list was provided to you. We are also currently working with you and P.G.&E. to see if County staff can have access to more detailed maps so that so that staff may complete the analysis as to other county owned or county leased properties that would not be reflected as an APN? We reserve the right to submit further comments once staff is able to review the more detailed maps and information.

11. The current proposed route runs adjacent to County facilities at Tower Road. What are the impacts, if any, to existing facilities? In particular, the County would appreciate an analysis of potential impacts to the County's emergency services communication facilities at that site as well as any such sites that are identified when adequately detailed maps of the proposed routes are available.

12. The County asks that the EIR include an analysis of potential impacts to the County's proposed new Juvenile Justice Facilities at Tower Road. Both you and Susan Lee will be included in the circulation list for the Initial Study/Negative Declaration for the facilities. We anticipate that it will be issued in early March.

13. Does the Project include the expansion of P.G.& E.'s right of way, and if so, what is the process for that expansion. What impacts will there be on County property, particularly at Edgewood Park, Tower Road and San Bruno Mountain County Park?

Comments and Questions from County Environmental Health:

14. We would like a full and fair discussion in the EIR on the potential effects of Electromagnetic Fields (EMF) from the Project.

15. Trenching for an underground route, particularly in the urbanized North County areas, may impact identified sites and remediation programs for leaking underground storage tanks. We would like to see a discussion of this issue, and if indicated, appropriate mitigation measures.

Comments and Questions from County Planning Division:

16. The proposed routes along Interstate 280 are located in a designated Scenic Highway under the County's General Plan. We would appreciate a full and fair discussion of visual aesthetic impacts from the Project. For possible routes using above ground towers, we suggest that the EIR discuss a range of options and styles of towers that are currently available.

17. The County has issued a number of use permits to communication companies to co-locate their facilities on P.G.&E.'s current towers along Interstate 280. What will happen to these facilities if the current towers are changed or removed?

Comments and Questions from County Public Works:

18. A preliminary review of the Project indicates that the County may be required to issue encroachment permits for work performed within the County rights of way (ROW). In that event, the County would like to rely upon the certified Final EIR as a responsible agency under CEQA in considering approval of the permits. Will the EIR adequately address this issue?

Please do not hesitate to contact our office if you or Aspen Environmental Group need further information on these comments or information from the County generally.

Very truly yours,

THOMAS F. CASEY III, COUNTY COUNSEL

By: 

Mary K. Raftery, Deputy

TFC/MKR:gg

cc: Marcia Raines, Director of Environmental Services
Mary Burns, Director of County Parks and Recreation
Terry Burnes, Planning Administrator
Neil Cullen, Director of Public Works
Dean Peterson, Director of Environmental Health
Steve Alms, Real Property Manager