



February 22, 2003

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

Re: Notice of Preparation: Jefferson-Martin 230 kV Transmission Line Project,
Application No. A-02-09-043

Dear Ms. Blanchard,

On behalf of the more than 23,000 members of the Loma Prieta Chapter of the Sierra Club, I am writing in support of full evaluation of Alternative 1B in the EIR/EIS (undergrounding of the southern 14 mile segment of the route through the San Francisco Watershed), as well as study of some modifications for the above-referenced project.

The Sierra Club has a long-standing interest in the Peninsula Watershed Lands. Our Chapter members worked extensively in the 1960's with the City and County of San Francisco to ensure that the routing of I-280 was protective of the Crystal Springs Lakes. As a result of these efforts, there now exists a Scenic and Recreation Easement on 19,000 acres of the watershed lands, and a Recreation Easement on 4,000 acres. These easements, now administered by the Secretary of the Interior through the Golden Gate National Recreation Area, require that the watershed be kept in its natural state. Although the existing 100 towers and their associated 60 kV transmission lines that traverse the watershed predated this easement, the proposal by PG&E to add a 230 kV transmission capability will require increasing the width of PG&E's right of way from the current 50 feet to 100 feet. Additionally, it is proposed to replace each of the 100 towers that are currently between 80 and 100 feet high with new, taller towers that would range from 100 to 150 feet in height.

This increase in height and width of the new towers would create potentially significant adverse impacts to the world renowned scenic qualities of the watershed. Along the route there are areas of high environmental sensitivity, including the serpentine grasslands at Edgewood County Park and Natural Preserve, and to the west of the San Mateo Highlands area. Access roads, staging areas, and areas for excavated materials would be required for the proposed new towers—creating a significant area of impact, in addition to the footprints of the proposed new towers themselves. Under the proposal, the access roads would be permanently retained for future maintenance of the towers.

Although PG&E proposes to use helicopters for installing towers in Edgewood Park itself, this would not avoid impacts from construction disturbance for excavating and pouring the new towers' concrete foundations. Some of the most important habitat for serpentine species, particularly the Bay Checkerspot Butterfly and the Edgewood Blind Harvestman occurs below and directly adjacent to the existing towers.

In order to avoid completely impacts to these endangered species at Edgewood Park, the new lines should—at a minimum—be undergrounded from the Edgewood Substation under Canada Road to at least the 2.0 milepost. As part of this project, the existing 60 kV lines in this section should also be undergrounded, and the towers removed by helicopter (note that leaving the existing foundations in place may be preferable, as this would avoid any disturbance to the sensitive habitats there).

The area that would have high priority for undergrounding from an environmental, habitat and visual resource perspective is the segment between approximately Milepost 4 and Milepost 7. Undergrounding under Canada Road and continuing north under Skyline Boulevard would not only avoid the serpentine grasslands in this area, but would also avoid impacts, including potential increased exposure to electromagnetic fields (EMFs) to the residents of the adjacent Highlands area.

The third priority area would be adjacent to residential areas of Hillsborough, to reduce visual impacts to the community, as well as potential increased EMFs.

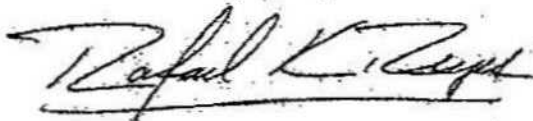
The undergrounding of the entire 14.7 mile segment, and at the same time undergrounding the existing 60 kV transmission lines under the existing roads would, in our view, be the most environmentally protective alternative. In addition to a tremendous gain in the visual quality of the watershed, undergrounding of the existing lines would greatly increase the security of the system from vandalism and terrorism, an increasingly important concern now and in the future.

There are a number of technical issues that would need to be addressed such as providing transition points to connect with the above-ground 60 kV distribution and tap lines at several points along the route, but these are not insurmountable.

We also note that the northern 12 miles of the proposed project will be underground under the city streets from San Bruno to the Martin Substation in Brisbane. If the project can be undergrounded throughout the northern half, there is no reason not to do the same on the southern.

Thank you for consideration of our comments.

Sincerely,



Rafael K. Reyes
Chapter Chair
Sierra Club, Loma Prieta Chapter