

Jefferson-Martin Transmission Project

From: stimby@sulmail.stanford.edu on behalf of Sara Timby [stimby@stanford.edu]
Sent: Thursday, February 27, 2003 8:23 AM
To: jeffmartin@AspenEG.com
Cc: GStigall@aol.com; Lennie@darwin.ptvy.ca.us
Subject: Jefferson-Martin 230kV project

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

RE: Notice of Preparation for
Jefferson-Martin 230 kV transmission
line project proposed by PG&E
(Application No. A-02-09-043)

Thank you for sending the NOP to my attention. I am pleased to have the chance to make these preliminary comments on behalf of the local chapter of the Native Plant Society.

Our major concern with this project is for the numerous special status plants (serpentine endemics) that exist in the corridor for the southern segment of the project, particularly through Edgewood County Preserve and the San Francisco watershed lands that exist on serpentine-derived soils (both grasslands and wetlands).

The exact locations of particular species and their protected status will be mapped in the EIR, however it is not too early to mention that minimal disturbance will be imperative to maintaining the populations.

Alternative suggestion:
We would like to see the 14.7-mile proposed overhead replacement substituted by undergrounding the lines under existing roads (either Canada or 280). This is the proposed "All underground alternative".

Undergrounding in the southern segment will minimize new construction disturbance of soil and plants and the ongoing maintenance after construction. The component of putting the lines "under existing roads" is crucial; otherwise we end up with potentially more disturbance than putting in new towers.

Mitigation measures:
#1.
The timing for removing the old

towers must also be carefully planned to occur during the least disruptive time of year. Whether or not this is done by helicopter, I would guess that the best time would be late summer before any chance of new rains.

#2.

We would also like to see some method of controlling weed seeds that are usually brought in on heavy equipment. Perhaps a thorough washing-off of the equipment could be planned before entry on any day into serpentine soils. More thought could go into further means of control of weedy species invading disturbed soil.

Thank you for your consideration of these ideas.

Sara Timby
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