



SAN FRANCISCO PUBLIC UTILITIES COMMISSION
Water Supply and Treatment Division
Land and Resources Management Section

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February 27, 2003

WATER
HETCH HETCHY
WATER & POWER
CLEAN WATER

Billie C. Blanchard
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VIA FACSIMILE: (415) 703-2200

Dear Ms. Blanchard:

On February 19, 2003, you met with staff members of the San Francisco Public Utilities Commission, Water Supply & Treatment Division ("SFPUC") to solicit comments regarding topics and alternatives that should be included in an EIR for the Jefferson-Martin Transmission Project ("Project"). As required by the California Environmental Quality Act ("CEQA"), the CPUC, as lead agency in the preparation of an EIR, must consult with public agencies that have jurisdiction over lands affected by the Project. The SFPUC is one of the public agencies that must be consulted because the proposed route of the Project will traverse watershed land under the control of the City and County of San Francisco ("CCSF"). The following comments summarize the issues and thoughts raised by the SFPUC staff at that meeting.

As managers of the SFPUC's Peninsula Watershed lands, SFPUC is interested in minimizing the impacts of the proposed electrical utility upgrade to the natural and cultural resources of the Peninsula Watershed.

These watershed lands contain several water reservoirs that supply the San Francisco Peninsula and are part of a water supply system that serves over 2.4 million people in the Bay Area. Maintaining a healthy watershed ecosystem is crucial to providing high quality source water and protecting the water supply. Maintaining high water quality by protecting the watershed environment reduces the need for more extensive water treatment, keeping water rates affordable for consumers. To that end, the mission of the SFPUC for managing the Peninsula Watershed is to provide the best environment for the production, collection, and storage of the highest quality water for our customers.

Because the Peninsula Watershed has been used for water collection and storage for over 130 years, these lands have been protected from the urbanization that has consumed much of the surrounding area. As a result, the Peninsula Watershed hosts a variety of habitats and supports the highest concentration of rare, threatened and endangered species in the nine-county Bay Area. In addition, the Watershed is a designated State of California Fish and Game Refuge.

To protect the natural and cultural resources of the Peninsula Watershed, the SFPUC adopted the Peninsula Watershed Management Plan in June 2001. The primary goal of the Plan is to maintain and improve source water quality to protect public health and safety. Secondary goals include the preservation and enhancement of ecological and cultural resources of the watershed. The Peninsula Watershed Management Plan and EIR are available on the SFPUC website (www.sfwater.org).

After reviewing the proposed Jefferson/Martin Transmission Line project alternatives, SFPUC staff prefers alternatives that do not involve the placement of the transmission line underground through sensitive areas of the Watershed. Undergrounding the utility in areas of high ecological sensitivity would create a much higher level of disturbance than the original proposal to replace and upgrade the existing towers and overhead lines using a helicopter equipped with a crane. Given the rugged terrain often encountered on the Peninsula Watershed, placing the transmission line underground could require a realignment of the existing Pacific Gas and Electric (PG&E) utility easement, impacting more areas of the Watershed. Additional access roads would also be necessary, which would further degrade the natural values of the Watershed and potentially compromise the water quality of reservoirs by creating more erosion.

You should also be aware that placing the proposed electrical transmission line underground could potentially interfere with SFPUC operations and compromise existing infrastructure. As we described in our recent meeting, several underground water transmission lines cross the existing PG&E utility easement and areas proposed for undergrounding the electrical transmission line. These water transmission lines include the Hetch Hetchy Aqueduct under Canada Road, a major link in the water delivery system. The SFPUC is also concerned about the safety of its work crews performing maintenance on water transmission lines buried adjacent to a 230 kV electrical cable.

In addition, you also mentioned at our recent meeting a proposal to attach the proposed electrical transmission line to the Upper Crystal Springs Dam. SFPUC engineering and operations staff must review any proposal to attach an electrical transmission line to the Upper Crystal Springs Dam. As we stated at our recent meeting, San Mateo County is planning an improvement project for the bridge on top of the Upper Crystal Springs Dam. PG&E may be interested in talking to San Mateo County about the possibility of attaching the electrical transmission line to the proposed bridge.

Hillsborough/Burlingame Area

The areas of the Watershed adjacent to the Hillsborough/Burlingame area are serpentine soil grassland with a unique assemblage of native plant species. The level of disturbance from undergrounding the utility in this area would be devastating to natural resources. Although the trench required to underground the transmission line would be relatively narrow, the disturbance from the excavation and replacement of materials, the installation of the cable, and the associated construction equipment would create a wide swath through a very sensitive part of the Watershed. Once soil is disturbed in such an extensive manner, a pathway for invasive exotic plant species is created. These invasive exotics, such as pampas grass and broom, are windblown, deposited by birds, or arrive on the wheels of construction equipment and vehicles. Invasive exotics take hold in disturbed soils and spread quickly beyond the boundaries of a construction project. Invasive exotics out-compete native plant species and destroy valuable habitat. Eradication of weedy exotics can take place over several years with only limited success. Because CCSF has banned the use of many pesticides on its property, we are limited in the methods that we can use to eradicate weedy species.

We have provided your consultant, Aspen Environmental Group, with our GIS database. A review of the SFPUC watershed land adjacent to the Hillsborough/Burlingame area shows that it contains highly

sensitive habitat. In addition, parts of this area are identified as zones of cultural resource sensitivity making them vulnerable to adverse impacts from excavation.

If it were decided to place portions of the Jefferson/Martin Transmission Line underground to reduce visual and other impacts to the residents of Hillsborough and Burlingame, the SFPUC would prefer to see the utility line installed under existing paved streets and highways (provided that to do so would not conflict with SFPUC utilities) to reduce impacts to sensitive habitat on the Peninsula Watershed.

Edgewood Park

We understand that the CPUC has received comments from the public requesting a realignment of the electrical transmission line to reduce visual impacts to Edgewood Park. The proposal is to remove the existing line that traverses Edgewood Park and relocate the upgraded line further west on SFPUC property.

Unfortunately, this proposal would accomplish very little in terms of reducing visual impacts in the public view corridor. The existing electrical utility line already skirts the edge of Edgewood Park and it would still be very visible to park users if it were moved west onto SFPUC property. This proposed realignment would not be effective in reducing visual impacts and would only create adverse impacts to natural and cultural resources (see Composite Ecological Sensitivity Zones and Known Cultural Resources and Potential Sensitivity Zones in the GIS). Moving the transmission line further to the west side of I-280 is completely out of the question. This area, known as the Triangle, contains high-quality serpentine bunchgrass grassland. The Triangle contains rare species of native plants and is one of only two known locations of the San Mateo thornmint (*Acanthamintha duttonii*), a state and federally listed endangered species.

Potential Impacts to Watershed Trails and Public View Corridor

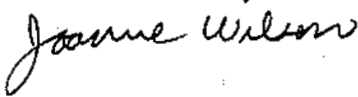
For the most part, we recognize that potential impacts to existing trails and recreational uses on the Peninsula Watershed will be temporary impacts during construction. The upgrade of the Jefferson/Martin Utility Line using taller towers to suspend the cable will necessitate a wider utility easement for PG&E. To mitigate potential long-term impacts to existing trails and the quality of the trail experience (including views), we recommend that PG&E develop additional public trails on SFPUC property bounded by Canada Road, Highway 92, and Edgewood Lane. These proposed trails would open new public viewsheds and provide new recreational opportunities. I am enclosing a brochure entitled "Preliminary Peninsula Watershed Trail Concepts" for your information. These proposed trails are included in the Peninsula Watershed Management Plan and were reviewed as part of a program-level environmental impact report.

PG&E also proposes an Overhead/Underground Transition Station at San Bruno Avenue and Skyline Boulevard, which is also the terminus of the North San Andreas Trail on the Peninsula Watershed. This provides another opportunity for project mitigation by providing a parking area and improved trailhead at this location.

In addition, we are interested in reviewing the tubular type tower (as opposed to the lattice style tower) to assess whether visual impacts could be reduced.

Thank you for taking the time to talk to us and providing an opportunity to comment. If you have any questions or need further information, please contact me at 650-652-3209.

Sincerely,



Joanne Wilson, AICP
Land and Resources Planner

Enclosure

C: Pat Martel, Cheryl Davis, Ed Smeloff, Sandra Rovetti, Joe Naras (SFPUC)
Joe Como, Josh Milstein (City Attorney's Office)
Barry Flynn, Flynn Resource Consultants Inc.
Susan Lee, Aspen Environmental Group
Robert Masouka, PG&E

PRELIMINARY PENINSULA WATERSHED TRAIL CONCEPTS

The San Francisco Water Department (SFWD) is currently preparing Watershed Management Plans for their two local watersheds - the 23,000 acre Peninsula Watershed and the 40,000 acre Alameda Watershed. Together these watersheds store and provide water for 2.3 million Bay Area customers. Following two years of research, data collection, and analysis, SFWD and the watershed planning team have developed a preferred watershed management strategy. This strategy recommends a restrictive approach to watershed management which emphasizes protecting water quality and sustaining the watersheds for future generations. As the population of the Bay Area expands and water regulations become increasingly strict, the most important consideration for future generations will be provision of a clean, pure water supply. This is best achieved by effective watershed management rather than water treatment and in-reservoir management practices.¹

SFWD's preferred strategy provides for the enhancement of recreational opportunities where they are compatible with the watershed management goals and prudent watershed protection. New trails in areas of lesser vulnerability and risk will be considered and new trails adjacent to developed areas and SFWD watershed boundaries will be given priority. Trails which connect to urban areas, to existing trail systems, and to trail facilities of other agencies will also be given priority. Public access to all trails will be determined on a site specific basis and all new trails will be subject to project specific environmental review. Existing public trails will remain open without a permit.

Construction, management, maintenance, and staffing of new trails will be accomplished through cooperative arrangements with existing agencies and will not become a rate payer expense. All trail activity will be monitored for its impact to water quality and the watershed ecosystem.

Access to internal roads and fire breaks will be limited to docent-led groups. Public access to the interior of the watershed increases the risk of fire. Fire poses a risk to water quality, to the watershed's ecological resources, and to lives and property. Docent-led activities, such as those conducted on the Filoli Nature Trail, will provide the public with the opportunity for guided hikes through the interior of the watershed while reducing risks.

PENINSULA WATERSHED NORTH-SOUTH TRAIL

Throughout the planning process, certain members of the public have expressed a desire for a north-south trail through the Peninsula Watershed. SFWD and the watershed planning team have identified a conceptual north-south alignment which would maximize protection of water quality and the watershed resources and also meet the trail criteria established by the Bay Area Ridge Trail Council. This north-south trail would connect the parks and open space areas north of the watershed (GGNRA's Sweeny Ridge Skyline Preserve) with those south of the watershed (Huddart Park, Edgewood Park, and the Phleger Estate) and would provide unrestricted public access and convenient connections to adjacent communities. Water, sanitary facilities, telephone service, and parking could be provided at a relatively low cost. When compared with trail alignments through the watershed's interior, this alignment would greatly reduce the risk of fire and water quality degradation, would reduce the potential for damage to sensitive watershed resources, and would not hinder SFWD's day-to-day watershed management operations. The costs of fire management, fencing, maintenance, and overall trail management and patrolling would also be considerably lower than other proposed alignments.

Presently, there are approximately 25 miles of public trails located on the Peninsula Watershed, with additional trail connections planned through cooperative arrangements with San Mateo County. All of these trails lie within the Scenic and Recreation Easement which permits public access and recreation activities within the 4,000 acre area east of the reservoirs. To build upon this existing trail system and complete a north-south trail through the watershed would require the addition of two new trail segments within the Scenic and Recreation Easement: a one-mile segment in the northernmost portion of the watershed and a five-mile segment along the urban boundaries of Belmont and San Carlos.

The proposed northern trail segment would require new construction to connect Sweeny Ridge with the existing trail system which includes San Andreas, Sawyer Camp, and Crystal Springs Trails. The proposed southern trail segment would complete a ten-mile loop from Crystal Springs Trail with direct access to adjacent communities and connections to Ralston, Sheep Camp, and Water Dog trails, as well as the Huddart and Edgewood Park trails. This loop would be ideal for short hikes, the most popular type with the majority of trail users. The two-mile semi-public Filoli Nature Trail also connects with Crystal Springs Trail in this vicinity. Filoli uses this trail for docent led nature hikes on a reservation basis.


















The southernmost segment of the Peninsula Watershed trail system is the Crystal Springs Trail which connects to the Huddart Park trail system. These trails ascend to Skyline Boulevard at Kings Mountain with many alternative routes available, including future access through the GGNRA's Phleger Estate acquisition.

The adjacent map identifies both existing trails and the preliminary concepts for new trails and their location in relation to the high resource sensitivity zones on the Peninsula Watershed. The most sensitive areas are covered with the densest hatching. On the following page five views from the proposed trail alignment are identified on the map and keyed to photographs of the views.

FOOTNOTES

1. Robbins et al "Effective Watershed Management for Surface Water Supplies", American Water Works Association Research Foundation: 1991)

LEGEND

-  Proposed Trails (Preliminary Concepts)
-  Existing Semi-Public Trail - Filoli Nature Trail (docent-led access)
- Existing/Planned Trails**
 -  Sweeny Ridge
 -  Sneath Lane
 -  San Andreas
 -  Sawyer Camp
 -  Crystal Springs
 -  San Mateo Creek
 -  Ralston
 -  Sheep Camp
 -  Water Dog
 -  Edgewood
 -  Canada
- High Sensitivity Zones**
 -  Water Quality
 -  Ecological Resources
 -  Fire Hazard
 -  Land Instability



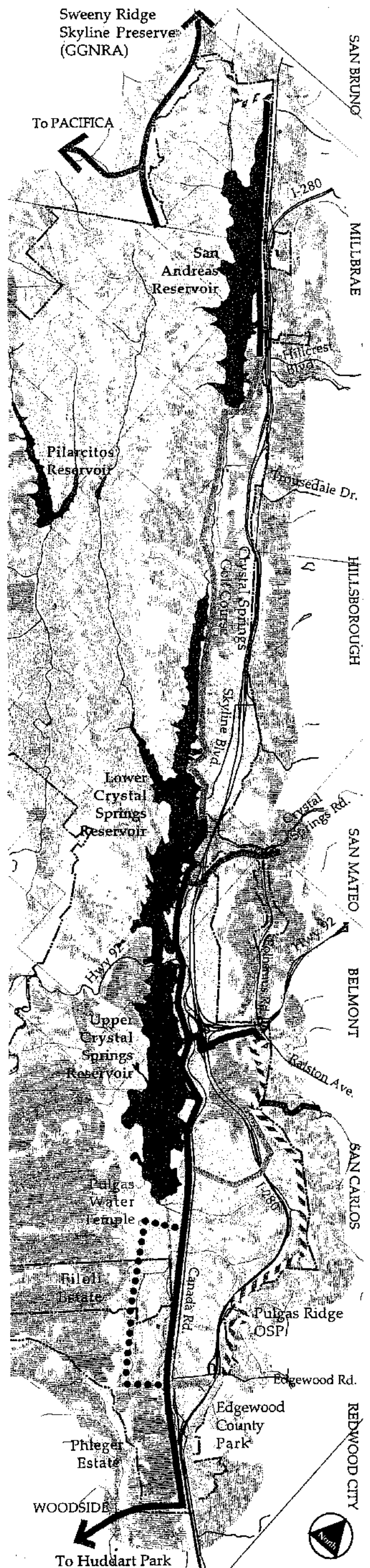
Sweeny Ridge Trail



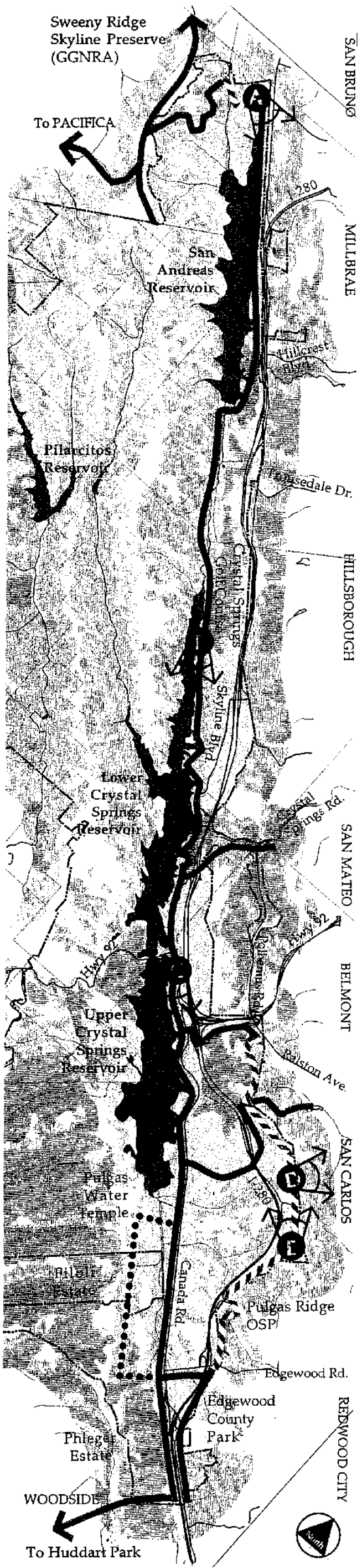
San Andreas Trail



Sawyer Camp Trail

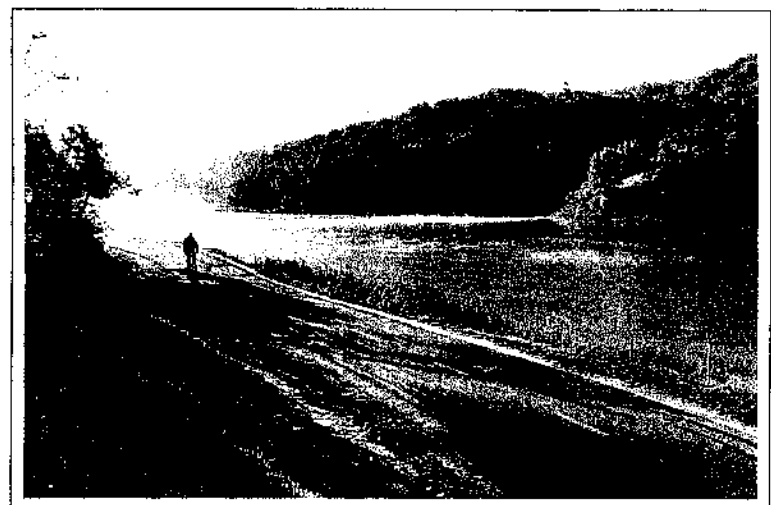
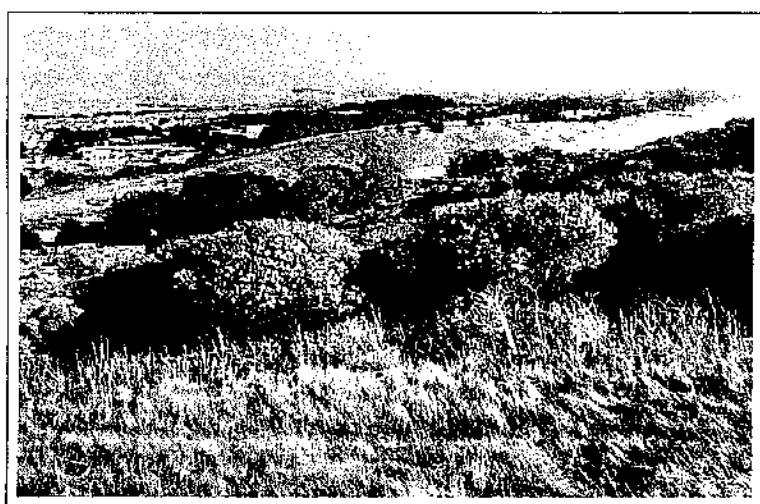


NOTE: Proposed trail alignments are illustrated for conceptual purposes only. All trail proposals will be subject to detailed mapping and the environmental review.



View from the proposed northern trail segment looking southeast. San Andreas Reservoir can be seen on the right side of the photo. San Francisco Bay and the Peninsula cities can be seen in the distance.

A

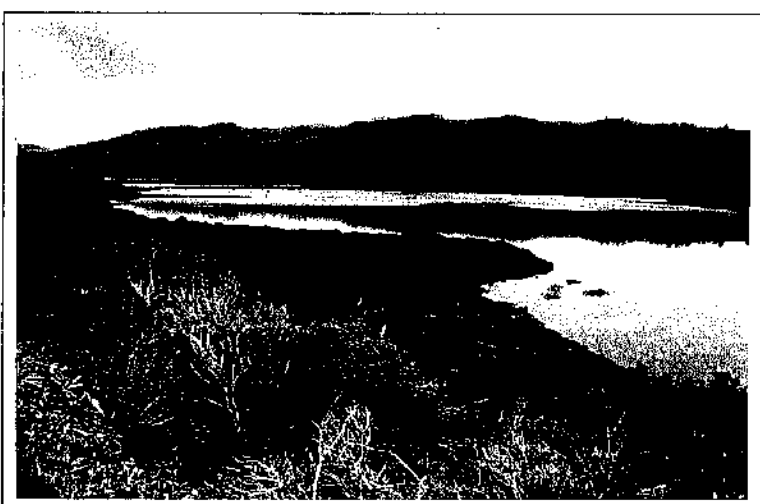


B

View from Sawyer Camp Trail looking southeast over Lower Crystal Springs Reservoir.

View from Crystal Springs Trail looking southwest over Upper Crystal Springs Reservoir.

C

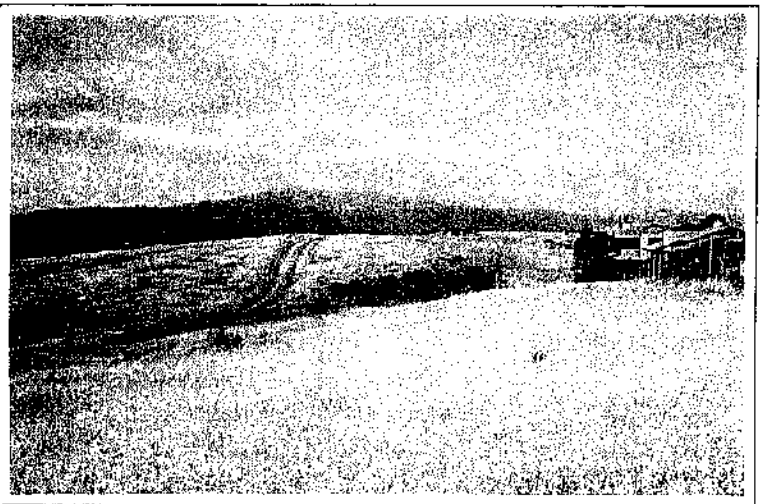


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

View looking east from the proposed southern loop trail extension. San Mateo Bridge can be seen in the center of the photo.

View looking northwest from the proposed southern loop trail extension. San Bruno Mountain can be seen in the background.

E



LEGEND

-  Proposed Trails (Preliminary Concepts)
-  Existing/Planned Trails
-  Existing Semi-public Trail - Filoli Nature Trail