

Comment Set O

CITY AND COUNTY OF SAN FRANCISCO



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August 28, 2003

Billie C. Blanchard
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Re: Draft Environmental Impact Report on the Jefferson-Martin 230 kV Transmission Project, Application No. 02-09-043

Dear Ms. Blanchard:

The City and County of San Francisco (CCSF) provides these comments on the Draft Environmental Impact Report (Draft EIR) entitled Jefferson-Martin 230 kV Transmission Project, Application No. 02-09-043, prepared by the California Public Utilities Commission. This is an important project that will go far to solve a major weakness in the transmission infrastructure of the San Francisco peninsula, by providing added capacity and a second independent major transmission line pathway, thereby providing needed electricity reliability.

The proposed route of the Project will traverse the Peninsula Watershed lands under the control of the City and County of San Francisco (CCSF). Staff members of the San Francisco Public Utilities Commission (SFPUC) have met with representatives of Pacific Gas & Electric Company, the project proponent, to provide information on the Peninsula Watershed lands for PG&E to use in developing its plan for the proposed Jefferson-Martin 230 kV Transmission Project. The SFPUC is a unit of CCSF with responsibility over "construction, management, supervision, maintenance, extension, operation, use and control of all water and energy supplies and utilities of the City as well as the real, personal and financial assets." (San Francisco Charter Section 4.112)

As managers of the Peninsula Watershed lands, the SFPUC must insure that PG&E minimize the impacts of the proposed electrical utility upgrade to the natural and cultural resources of the Peninsula Watershed and mitigate any adverse impacts that cannot be avoided.

These watershed lands contain several water reservoirs that supply the San Francisco Peninsula as 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

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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. Additional 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).

O-1

SPECIFIC DRAFT EIR COMMENTS

The purpose of an EIR is to provide public agencies and the public with detailed information about the effect a project is likely to have on the environment. (Public Resources Code §§21002, 21002(a), 21061) There are several areas outlined below where the Draft EIR does not provide the necessary information and an analysis of environmental effects.

1. Proponent's Proposal – Southern Segment

The proponent's proposed southern segment includes the installation of 14.7 miles of new overhead electric lines. A substantial portion of this work would take place on the SFPUC's Peninsula Watershed.

The proposed towers, due to their increased size, will require a wider right-of-way. PG&E proposes to increase the right-of-way from 50 feet to 100 feet in most areas. Because of the sensitive nature of the Peninsula Watershed, the Draft EIR must include more precise information about the expanded right-of-way and an evaluation of the associated environmental effects. In particular, the Draft EIR must address how PG&E will increase the right-of-way in areas where there is already limited space. For example, there are two existing towers (for the 60kV line) on the eastern shore of San Andreas Reservoir that are sandwiched between the water and the service road. Establishing a 100-foot wide right-of-way in this location without interfering with the SFPUC's access road may be impossible. The SFPUC will not permit tower footings or other facilities to be constructed within the shoreline or in the waters of San Andreas Reservoir.

O-2

Proper vegetation management of the PG&E expanded right-of-way during construction and in the long term is also important to the SFPUC. The SFPUC is very concerned about the potential impact of invasive plant species on the Peninsula Watershed. Once areas are disturbed, invasive plant species can become established and spread to other watershed areas. Mitigation

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measures in the Draft EIR designed to address this issue only cover the period prior to and during construction of the proposed project. The Draft EIR does not adequately assess and mitigate for the spread of invasive plant species on the Peninsula Watershed. Additionally, the California Department of Forestry and Fire Prevention has designated the Peninsula Watershed as a high fire hazard area. The Draft EIR fails to address the potential for fires during construction.

O-3

To address these issues, the Draft EIR should require PG&E to prepare and implement a comprehensive vegetation management plan for the transmission line right-of-way (including staging areas and construction routes) that includes measures to reduce fire hazard and avoid the establishment and spread of invasive plant species. At a minimum, PG&E should be required to maintain a rigorous invasive plant species eradication program for the life of the project in compliance with SFPUC's vegetation management plan for the right-of-way on watershed land. The SFPUC has developed Best Management Practices (BMPs) for use by SFPUC employees, contractors and consultants when working on watershed land. BMPs for preventing the spread of invasive plant species include regular cleaning of boots, vehicle tires, and equipment prior to entering the watershed. We expect PG&E to exercise the same level of care as we require of our employees and contractors.

The proponent's proposal also includes the dismantling of the existing 60kV line. Our understanding is that this would take place in construction staging areas on the Peninsula Watershed. PG&E staff has informed the SFPUC that they believe there is lead-based paint on the existing towers. The Draft EIR must include an assessment of the impact of this lead-based paint on the environment and mitigation methods, as necessary. In order to protect the natural resources of the watershed lands, including water quality, flakes of lead-based paint must, at a minimum, be captured and properly disposed of during tower demolition activities. Mitigation measures should include a hazardous material plan to deal with this issue and ongoing site monitoring and corrective measures during and immediately after the tower removal.

O-4

Because of the increased size, the proposed towers will create visual impacts to active recreation areas on the SFPUC's Peninsula Watershed. These areas include the Crystal Springs Trails Complex on the eastern side of the watershed (on SFPUC lands, but managed by San Mateo County through its easement). To mitigate for visual impacts, the Draft EIR should require PG&E to develop new trails on the eastern side of the Peninsula Watershed on lands east of Interstate 280 known as the Hallmark Parcel. Information on this trail expansion should be included in the Draft EIR.¹ These trails would offer excellent views that would mitigate for the impacts to views from existing recreational trails from the proposed project.

O-5

In addition, the proposed transition station at San Bruno Avenue and Glenview Drive (Caltrans Property) or Skyline Boulevard at San Bruno Avenue (SFPUC property) offers an opportunity to enhance recreational trails by providing trail parking. In the near future, San

O-6

¹ As part of our comments on the EIR scoping document, CCSF had submitted to the CPUC a brochure that provides a conceptual plan for the proposed new trails. CCSF is submitting a copy under separate cover today.

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Mateo County will extend the San Andreas Trail northward to connect with other County parks. A trail parking lot at the Jefferson-Martin Transition Station could further ameliorate impacts to recreation by providing more convenient access.

O-6

2. Project Proposal – Northern Segment

The underground (northern) segment of the proposed project would pass through the cities of San Bruno, South San Francisco, Colma, Daly City, and Brisbane. The underground portion of the project would, in several areas, cross the SFPUC's water transmission lines. These areas where the PG&E and CCSF utility lines would cross include San Bruno Avenue and Interstate 280 (San Andreas Pipelines Nos. 2 and 3), San Bruno Avenue at Acadia and Elm (Sunset Supply Line and Crystal Springs Pipeline No. 2), El Camino and San Bruno Avenue (San Andreas Pipeline No. 1), along San Bruno Avenue between Interstate 280 and Huntington Avenue (several SFPUC pipelines cross this area), the BART right-of-way near Orange Memorial Park, and Guadalupe Canyon and North Hill (west of Bayshore Boulevard).

O-7

The Draft EIR must include an analysis of the potential environmental impacts to these public services and utilities, including water transmission lines during and after construction, and associated mitigation measures as necessary. At a minimum, PG&E should be required to provide engineered drawings and a construction schedule to the SFPUC's Land Engineering Section of the Water Supply and Treatment Division for review and comment. The drawings must show the depth and size of the proposed transmission line structure. The mitigation measure should also require PG&E to pay for a SFPUC engineer to be on-site during construction near SFPUC water transmission lines.

3. Recommended Project Alternative – Southern Segment

The PG&E Underground Route Option 1B is an all-underground option that would be entirely within existing roadways (Canada Road, Skyline Boulevard, Trousdale Boulevard, and El Camino Real). There are two areas of concern to the SFPUC.

First, the proposed electrical transmission line would cross SFPUC water transmission lines in several locations, including the Hetch Hetchy Aqueduct under Canada Road. As stated above, the Draft EIR must include an analysis of the potential environmental impacts to these water transmission lines during and after construction, and associated mitigation measures as necessary. Mitigation measures must include, at a minimum, a requirement for PG&E to provide engineered drawings and a construction schedule to the SFPUC's Land Engineering Section of the Water Supply and Treatment Division for review and comment. The drawings must show the depth and size of the proposed transmission line structure. The mitigation measure should also require PG&E to pay for a SFPUC engineer to be on-site during construction near SFPUC water transmission lines.

O-8

Secondly, some of the options proposed for crossing Crystal Springs Reservoir near the Crystal Springs Dam are unacceptable to the SFPUC. Attaching the proposed electrical transmission line to the Crystal Springs Dam is not acceptable, as it would compromise the

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SFPUC's operational control of a key water utility structure. The SFPUC is also concerned about the safety of its work crews performing maintenance on dam if a 230 kV electrical cable was located nearby.

The Draft EIR also fails to address the environmental effects of a proposed underwater cable through the reservoir. There is no assessment of potential impacts to plant and animal species within the lake. The Draft EIR states that heat generated by an underwater 230 kV electrical transmission line could increase the water temperature in the vicinity of the line by 90°C. This is almost the boiling point of water. This large increase in water temperature will obviously produce severe environmental impacts to the biota of the lake. The lake is home to several cold water fish species, including descendants of historic steelhead populations that would be severely impacted by the heat from the cables on the lake bed. The Draft EIR also rejects options that include longer portions of underwater cables, in part because a 230 kV underwater cable had never been installed before. A criterion for rejection should also apply to the proponent's 3000 foot underwater cable proposal as well.

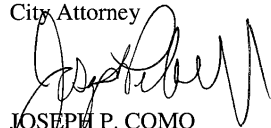
The SFPUC is also concerned about the potential impacts to the shoreline where the cable would transition from under roadways to the lake. Mitigation Measure B-9a is not adequately described because it does not provide for protection of sensitive species or habitats. This mitigation measure only calls for a survey for sensitive species or habitats in the future.

The SFPUC believes that the least intrusive alternative to crossing the Crystal Springs Reservoir is to hang the cable from the proposed new bridge on top of the dam. Since the construction schedule for this proposed bridge is uncertain, a temporary crossing using an overhead line across San Mateo Creek could be considered as a temporary solution.

Thank you for providing this opportunity to comment on the Draft EIR for the Jefferson-Martin Project. If you have any questions or need further information, please contact Joanne Wilson, Land and Resources Planner for the SFPUC at 650-652-3205 or the undersigned.

Very truly yours,

DENNIS J. HERRERA
City Attorney



JOSEPH P. COMO
Deputy City Attorney

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

1657 Rollins Road, Burlingame, Ca 94010 ♦ Tel: (650) 652-3209 ♦ Fax: (650) 652-3219



August 28, 2003

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PATRICIA E. MARTEL
GENERAL MANAGER

Dear Ms. Blanchard:

This is to transmit a copy of the SFPUC's brochure entitled *Preliminary Peninsula Watershed Trail Concepts*. This material was sent to you previously on February 27, 2003 with the SFPUC's comments on the topics and alternatives that should be included in an environmental impact report (EIR) for the Jefferson-Martin Transmission Project. I am sending another copy of the brochure so that it will be included in the EIR comments for the Jefferson-Martin 230 kV Transmission Project along with the comment letter (sent separately to you) from San Francisco City Attorney's Office.

If you have any questions or need further information, please contact me at 650-652-3205.

Sincerely,

Joanne Wilson, AICP
Land and Resources Planner

Enclosures

C: Joe Como, City Attorney's Office

O-10

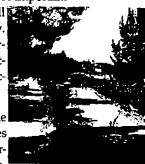
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PRELIMINARY PENINSULA WATERSHED TRAIL CONCEPTS

The San Francisco Water Department (SFWD) is currently preparing Watershed Management Plans for their two local watersheds - the 23,000 Peninsula Watershed and the 40,000 Laredo 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 water 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 the vision of a clean, pure water supply. This best achieved by effective water management rather than water treatment and in-reservoir management practices.



Sweeny Ridge Trail



San Andreas Trail



Sawyer Camp Trail

The preferred strategy provides for the development of recreational opportunities that are compatible with the water management goals and prudent watershed protection. New trails in areas of vulnerability and risk will be considered and new trails in developed areas and SFWD watershed boundaries will be given priority. Trails that 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 case-by-case basis and all new trails will be subject to project specific environmental review. Existing public trails will remain open without a permit.

The construction, management, maintenance, and staffing of new trails will be accomplished through cooperative arrangements with existing agencies and will not become a rate payer responsibility. All trail activity will be monitored for its impact on water quality and the watershed ecosystem. Access to internal roads and fire breaks will be limited to authorized 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, 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 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 meet the trail criteria established by the Bay Area 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 the south of the watershed (Huddart Park, Edgewood and the Phleger Estate) and would provide unprecedented public access and convenient connections to urban 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 day-to-day watershed management operations. Costs of fire management, fencing, maintenance, 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

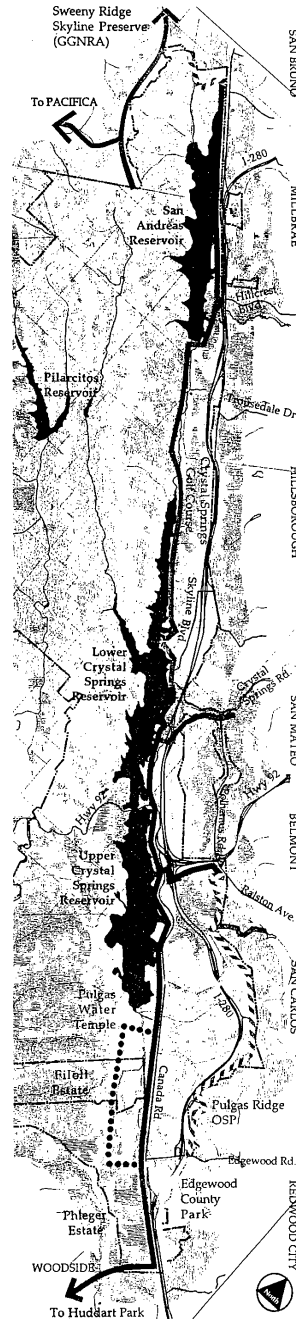
- Proposed Trails (Preliminary Concepts)
- Existing Semi-Public Trail - Filoli Nature Trail (docent-led access)

Existing/Planned Trails

Sweeny Ridge	Ralston
Sneath Lane	Sheep Camp
San Andreas	Water Dog
Sawyer Camp	Edgewood
Crystal Springs	Canada
San Mateo Creek	

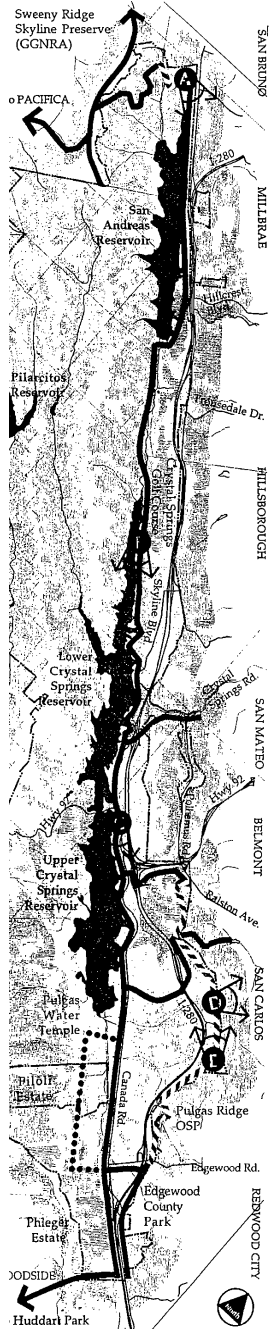
High Sensitivity Zones

Water Quality	Fire Hazard
Ecological Resources	Land Instability



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

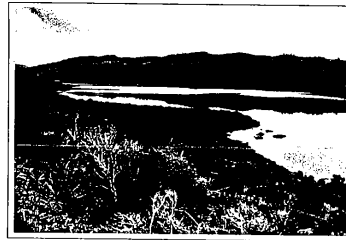
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View from the proposed northern trail segment looking southeast. San Andreas Reservoir can be seen on the right side of the photo. San Francisco Bay and the Peninsula cities can be seen in the distance.



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



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



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.



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

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Responses to Comment Set O – City and County of San Francisco

O-1 The value of the Watershed Lands is recognized throughout the EIR. Numerous mitigation measures are recommended to minimize impacts on water quality, biology, visual resources, and recreation resources in and adjacent to Watershed Lands.

O-2 PG&E was asked to provide information in response to this comment. Following is PG&E's response:

The 100 foot right-of-way requirement represents a general estimated width along the entire proposed Route Option 1A based on preliminary design analysis. The actual required right-of-way width will vary somewhat along each tower span and the ultimate size of the right-of-way will not be determined until final design is completed. Upon review of their comments, the City and County of San Francisco ("CCSF") appears to misunderstand the purpose and use of the overhead transmission line right-of-way. In describing potential conflicts in "constricted areas," CCSF expresses concerns about interference with an access roads or the placement of facilities within or immediately adjacent to reservoirs. The primary purpose of establishing a right-of-way corridor around transmission lines is not to construct facilities (other than the towers and supporting structures) but rather to retain control over this land to ensure that nothing is built or grows nearby that will interfere with the conductors, and to ensure adequate access for maintenance purposes. The existence of the right-of-way will not impact existing uses of the access road nor will it result in the construction of facilities within the reservoir or shoreline.

O-3 In Section D.4.3.3, 230 kV/60 kV Overhead Transmission Line, under Impact B-1 (Temporary and Permanent Loss of Sensitive Vegetation Communities) the spread of invasive weeds is discussed. APM Bio-5 and Bio-6 discuss invasive species and coordination with the San Francisco Watershed and resource and public agencies, and Mitigation Measure B-1g implements weed control guidelines. Regardless, an additional paragraph has been added to Mitigation Measure B-1g that includes the preparation and implementation of a comprehensive Vegetation Management Plan for review and approval by the SFPUC and appropriate resource and local agencies.

Impact B-2, Loss or Damage to Trees, discusses ongoing vegetation clearing around tower footings that would be necessary to reduce fire hazard. The Worker Environmental Awareness Program (Mitigation Measure B-1i) discusses fire protection measures, as does APM 11.1 (Environmental Training and Monitoring Plan), which details a Fire Response Plan. In addition, APM 11.6 from the PEA requires PG&E to prepare a Fire Risk Management Plan to reduce the potential for fire during construction. The wording of APM 11.1 has been added to Section D.8.8.2 (Public Health and Safety), Environmental Impacts and Mitigation Measures for the Proposed Transmission Line, under Impact PS-4, Wind, Earthquake, and Fire Hazards, in this Final EIR. The potential for fire hazards during operation is discussed in Section D.8.7.2, Other Field Related Public Concerns.

O-4 The presence of lead-based paint on the tubular steel poles that are scheduled for removal requires consideration of minimizing paint chipping during dismantling, and methods to contain, collect and dispose of any paint chips generated. The Draft EIR has been revised in Section D.7.3.3, Impact H-2 (Degradation of Surface or Ground Water Quality Through Spill

of Potentially Harmful Materials Used In Construction), to include a discussion of lead-based paint. Mitigation Measure H-2a has been modified to incorporate requirements for lead paint.

- O-5 The Cumulative Project table (Table F-1) has been modified to include plans for new trails proposed for the Peninsula Watershed North-South Trail, including the Hallmark Parcel. Development of trails in the Hallmark Parcel as a mitigation measure for Proposed Project visual impacts to recreation resources in the Peninsula Watershed is not appropriate. The Hallmark Parcel is part of a larger regional planning process currently underway, and development of the trails would require design and approvals through that regional process. Additionally, development of trails on the Hallmark Parcel would create impacts, which would require separate environmental analysis under CEQA. For these reasons, development of the Hallmark Parcel trails as mitigation for impacts of the Proposed Project would not be roughly proportional to the impact it attempts to mitigate. In addition, there is no nexus that would tie impacts of the Proposed Project or alternatives to the suggested mitigation (trail development in another location as part of a regional trail system).

The EIR recreation section (Section D.9) addresses impacts of the Proposed Project and alternatives and provides mitigation measures for these impacts where a nexus between the project and the impacts has been established. While the impacts of the Proposed Project in Edgewood Park are identified as significant and unmitigable (Class I), other impacts identified have been mitigated to less than significant (Class III) levels.

- O-6 Based on comments of the City of San Bruno (see Comment Set B), which is the city with jurisdiction over the transition station property, a new mitigation measure has been added to Section D.2.3.4, Land Use – Transition Station. Mitigation Measures L-6a (Design of Proposed Transition Station) would require that the site design for the transition station allow for the proposed 112-car parking lot to be used for the San Andreas Trail trailhead. However, it is not appropriate for PG&E to pay for that lot, because impacts of the Proposed Project are unrelated to parking availability at trails in the area. Even so, the parking lot proposal can proceed without the number of proposed spaces being affected by the proposed structure.
- O-7 Section D.14.3.5 (230 kV Underground Transmission Line) in the Public Services and Utilities Section of the Draft EIR acknowledges impacts (Impact U-1: Utility System Disruption) to underground utilities throughout the underground portion (including the cities mentioned in the comment) of the Proposed Project, and provides Mitigation Measure U-1b (Protection of Underground Utilities) to reduce impacts to less than significant (Class III) levels. Mitigation Measure U-1b does require the Applicant to submit to the CPUC written documentation (construction plans designed to protect existing utilities and showing the dimensions and location of the finalized alignment), including evidence of review by appropriate jurisdictions (such as the SFPUC). Please see page D.14-9 of the Draft EIR for the full text of Mitigation Measure U-1b.
- O-8 Section D.14.4.1 (PG&E Route Option 1B) in the Public Services and Utilities Section of the Draft EIR acknowledges impacts (on page D.14-13 of the Draft EIR) to underground utilities in public roadways, and provides Mitigation Measure U-1b (Protection of Underground Utilities) to reduce impacts to less than significant (Class III) levels. Mitigation Measure U-1b does require the Applicant to submit to the CPUC written documentation (construction plans designed to protect existing utilities and showing the dimensions and location of the finalized alignment), including evidence of review by appropriate jurisdictions (such as the SFPUC). Please see page D-14-9 of the Draft EIR for the full text of Mitigation Measure U-1b.

- O-9 Attaching the cable to the dam should have no effect on the SFPUC's ability to operate this key water utility structure. Please see PG&E comments (Comment Set PG), Attachment C, which defines the method of the dam attachment, and PG&E Supplemental Comment dated September 12, 2003 (PG-319), which provides a letter postmarked September 4, 2003 from the California State Office of Dam Safety.

The environmental effects of an underwater cable are considered in Section D.4.4.1 of the EIR, under "Impact B-9: PG&E Route Option 1B – Underwater crossing Around Dam," which describes fish species that were identified in the reservoir in a 1995 SFPUC study. Also, this text has been amended to include the historic steelhead population referenced in the comment. This section describes the effects of the expected heat from the cable, and concludes that it would not affect the reservoir as a whole. Fish, which are mobile, would be able to relocate to portions of the reservoir distant from the cable.

- O-10 The trails proposed in the SFPUC brochure *Preliminary Peninsula Watershed Trail Concepts* have been identified in the Cumulative Impact section of the EIR. The Proposed Sweeney Ridge Connector Trail and San Andreas Trails are identified in the Recreation Section of the EIR in Tables D.9-1 and D.9-4 and discussed in Section D.9.3.4 (Disruption of Recreational Activities) and Section D.9.5 (Northern Alternatives) in relation to the transition station alternatives. While a number of the trails along the proposed Peninsula Watershed North-South Trail would be in the vicinity of project activities, as the timing of the development of these trails is currently uncertain, it is not anticipated that the project would conflict with any of these proposed trails. Please see Responses to Comments O-5 and O-6.

Comment Set P

STATE OF CALIFORNIA — BUSINESS, TRANSPORTATION AND HOUSING AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION

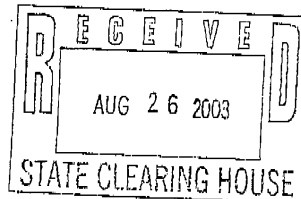
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Ms. Billie Blanchard
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Ms. Blanchard:

Jefferson-Martin 230 kV Transmission Line Project – Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation in the environmental review process for the proposed project. We have reviewed the DEIR and have the following comments:

Please provide the following information for our review and comment:

1. A lane closure chart and detour plan for all state facilities that will be impacted as a result of construction activity. These shall include lane closure damage calculation sheets and a set of calculations for all of the lane closure charts.
2. Please be advised that a final copy of the late lane closure damage calculations should be submitted to the Department.

We look forward to receiving the information at least ten days prior to certification of the EIR pursuant to Section 21092.5 (a) of the California Environmental Quality Act (CEQA).

Please be advised that any work or traffic control within the State right-of-way (ROW) will require an encroachment permit from the Department. To apply for an encroachment permit, submit a completed encroachment permit application,

P-1

P-2

"Caltrans improves mobility across California"

Comment Set P, cont.

Ms Billie Blanchard
California Public Utilities Commission
August 26, 2003
Page 2

environmental documentation, and five (5) sets of plans (in metric units) which clearly indicate State ROW to the following address:

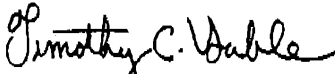
Mr. Sean Nozzari, District Office Chief
Office of Permits
California Department of Transportation, District 04
P. O. Box 23660
Oakland, Ca 94623-0660

P-2

Additional comments from our Hydraulics and Traffic Branches, if any, will be submitted as they are received.

Should you require further information or have any questions regarding this letter, please call José L. Olveda of my staff at (510) 286-5535.

Sincerely,



TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: Philip Crimmins (State Clearinghouse)

Responses to Comment Set P – California Department of Transportation

- P-1 If the project is approved and a specific route is selected, PG&E would be required to coordinate with the affected jurisdictions, including Caltrans, as appropriate. Coordination would include Caltrans review of PG&E's final design of traffic control measures that would be used within the public ROW pursuant to each jurisdiction's permit process, and implementation of Mitigation Measure T-1a, which requires input and approval of prepared Transportation Management Plans by each responsible public agency.
- P-2 It is acknowledged that PG&E would be required to obtain an encroachment permit for any work or traffic control within the State ROW. See EIR Transportation and Traffic Sections D.12.2 and D.12.3.3 for discussion of encroachment permits. The Caltrans requirement for encroachment permits has also been added to EIR Table A-3.

Comment Set Q



CITY OF BRISBANE

50 Park Place
Brisbane, California 94005-1310
(415) 508-2100
Fax (415) 467-4989

September 15, 2003

Billie Blanchard
CA Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Subject: Comments on the DEIR for the Proposed Jefferson-Martin 230 kV
Transmission Line Project

Dear Ms. Blanchard,

Thank you for your attendance at the last City Council meeting and for granting additional time to review and comment on the Draft Environmental Impact Report (DEIR) for the proposed transmission line project.

The City Council recognizes the importance of this project to the provision of electrical service to the region, as well as the impacts that this project would have on Brisbane and the other cities where the transmission line would be located.

During our review of the project, several questions were raised that need to be addressed in your "response to comments" on the environmental document. If any of our concerns are not specifically germane to the environmental analysis, we would, nevertheless, request that they be addressed, during subsequent public review hearings and/or as conditions of the project, if approved.

First, the environmental analysis of the route of the underground northern segment of the project has been done, largely, without benefit of the kind of detailed information on the location of the existing public infrastructure necessary to determine whether the route is feasible. For example, our information indicates that there is not adequate capacity in the existing right of way on Bayshore Boulevard, between Valley Drive and the Martin Substation, to accommodate the proposed new transmission line. This would apply to the alternative route as well, since they would both utilize this same segment of Bayshore Boulevard. Please address this issue.

Second, as required by the California Environmental Quality Act (CEQA), the DEIR analyzes a range of alternatives to the project, primarily alternative routes that the transmission line could take. One of the alternatives, the Modified Underground Existing 230kV Collocation Alternative, is considered to be the, "Environmentally Superior

Q-1

Q-2

Providing Quality Services

Comment Set Q, cont.

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CPUC

Alternative.” This route would enter Brisbane from the south along Sierra Point Parkway and Van Waters and Rogers Road, and then along Bayshore Boulevard to the Martin Substation. Given the significant disruption to business and traffic flow that installation of the transmission line would cause along Van Waters and Rogers Road and Bayshore Boulevard, we seriously question whether this route is actually the “environmentally superior alternative”. **We oppose the adoption of the Modified Underground Existing 230 kV Collocation Alternative.** However, should it be chosen, we urge you to explore the feasibility of using the existing railroad right of way, so as to avoid disruption of the industrial complex along Van Waters and Rogers Road.

Q-2

The DEIR indicates that, “because the amount of underground construction work within the roads is directly proportional to the amount and duration of traffic and transportation impacts, the Modified Existing 230 kV Underground ROW Alternative is preferred over the proposed project”. We recognize that this alternative route requires about 4 miles less of underground construction. However, that aforementioned assessment assumes that the roadways impacted have an equivalent level of service. The Transportation and Traffic impact analysis provides information that the daily traffic volumes (Tables D.12. and D.12.9) on Bayshore Boulevard, along the “preferred” alternative route are considerably higher (almost double) than those along the proposed (Guadalupe Canyon Parkway) project route. While we recognize that the proposed mitigation measure (T-1b) would prohibit construction during between 6:00 and 9:30 a.m. and between 3:30 and 6:30 p.m., it is highly unlikely that Bayshore Boulevard can be restored to allow four lanes of travel, in-between construction hours. Thus, there will be a considerable period of disruption to traffic flow on this highly used arterial. Therefore, the disruption to traffic flow along this road segment, during the months of construction, may be much more significant than the DEIR assumes. It also appears that there will be much greater disruption to public transit service and emergency transport operations, from using this alternative route.

Q-3

Another concern for City of Brisbane, is that the “environmentally superior alternative” route identified in the DEIR (Modified Existing 230 kV Alternative), if chosen, would utilize Van Waters and Rogers Road, a private road, in-route to Bayshore Boulevard. This road provides access to VWR International, one of the largest employers in the City of Brisbane. According to Dan Ambose, Regional Distribution Manager for VWR International (letter to Billie Blanchard, dated 8/27/03), a discussion with a representative from PG&E has indicated that the installation of the transmission line, along this route, could interrupt their shipping dock operations for up to two weeks. Given that they ship approximately \$900,000 a day of critical product to some of the world’s largest, bio-tech, pharmaceutical and electronic manufacturers (on a “just in time” basis), this interruption would inflict an unacceptable financial burden on the company. Further, an adjacent Company and key partner of VWR International, Calrite Services, could also have their operations interrupted, by installation of the line. Any interruption could also be harmful

Q-4

Comment Set Q, cont.

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CPUC

to their business.

■ Q-4

It appears from a letter sent by Billie Blanchard to Mr. Wesley Skow of Latham & Watkins (dated August 26, 2003 with attached maps), that an alternative route for this segment, along the RR tracks on the east side of the aforementioned businesses, is viable.

■ Q-5


However, further review of this alternative by Dan Ambrose of VWR International (letter to Billie Blanchard dated 9/2/03, attached) indicates that other significant access interruptions could occur, unless this alternative route is modified to avoid using the ramp to Bayshore Boulevard that serves as access to the entire industrial complex. VWR International proposes that the alternative route follow the existing RR tracks to a point beyond which using the ramp to Bayshore Boulevard will no longer be necessary. It has been suggested that the railroad companies believe there is adequate room for the transmission line along this stretch and have indicated that they would be willing to accommodate this route. Apparently, making said modification could entirely avoid disruption to the operations of these businesses. The City of Brisbane strongly urges that the CPUC require that PG&E utilize the (VWR International) suggested "modified" alternate route for this segment of the transmission line, if the Modified Underground Existing 230 kV Collocation Alternative is chosen.

Finally, the City of Brisbane wants to make it clear that the restoration of any pavement, by PG&E, on Bayshore Boulevard, after installation of the new transmission line, under either the proposed project or the Modified Underground Existing 230 kV Alternative, will be required by the City.

■ Q-6

We thank you again for this opportunity to comment on the DEIR and the project.

Sincerely,


Cyril G. Bologoff, Mayor
City of Brisbane

c: Clay Holstine, City Manager
Dave Ambrose, VWR International
Daryl Whitney, Calrite Services
Randy Breault, Public Works Director
William Prince, Community Development Director
Brisbane Chamber of Commerce

Responses to Comment Set Q – City of Brisbane

Q-1 Because final design for the Proposed Project or any alternative has not been completed, the determination of available space in any roadway is based on a preliminary assessment of visible roadway indicators. Bayshore Boulevard north of Van Waters and Rodgers Road does not appear to present constraints to new substructures. North of Guadalupe Canyon Parkway, PG&E assessed the road as having adequate space. However, in response to this comment, CPUC has requested that PG&E coordinate with the City regarding available space in Bayshore Boulevard and Route Options D and F have been developed (see Figure Ap.1-12a). These options would require the transmission line to continue north adjacent to the railroad tracks, north of the north end of Van Waters and Rodgers Road, and then turn west into Bayshore Boulevard within 200 feet north of the intersection. Use of these options would eliminate any possibility that project construction would impact the businesses on Van Waters and Rodgers Road.

Q-2 The City's opposition to the Modified Underground Existing 230 kV Collocation Alternative is acknowledged. Based on information provided in comments on the Draft EIR and further analysis conducted for this Final EIR, this alternative and the Proposed Project's underground segment are found to be comparable in their level of impact so both routes are found to be environmentally superior.

With respect to the Modified Underground alternative, consideration of traffic impacts is one of 13 resource areas considered in the EIR, and the selection of the environmentally superior alternative is based on consideration of the complete range of impacts. Because traffic impacts are short-term, they are given somewhat less "weight" in the comparison of alternatives than impacts to sensitive land uses, which could be affected during both project construction and operation. Also, please see Response to Comment PG-36. With respect to potential use of the railroad ROW, please see Responses to Comment Set J.

Q-3 Disruption to traffic, public transit, and emergency transport operations would occur also with the Proposed Project route in Daly City and Colma, where the route would be within narrower streets that also provide bus service. These impacts are acknowledged for both routes, and mitigation is recommended to ensure that impacts would be less than significant. It is inevitable that construction of a project such as the Proposed Project would cause some disruption during construction, and it is generally considered preferable that such disruption occur in more industrial (rather than residential) areas, and along more major streets where the additional lanes offer flexibility for traffic control.

Q-4 The potential disruption to businesses on Van Waters and Rodgers Road is acknowledged. However, as illustrated in Figure Ap.1-12a and Ap.1-12b, several route options have been identified that would minimize this disruption. By use of Route Option D (acknowledged in Comment Q-5 below) and Route Option F, in which the transmission line would be installed in the roadway east of the buildings on Van Waters and Rodgers Road immediately adjacent to the railroad right-of-way and the connection with Bayshore Boulevard would occur north of the existing ramp, disruption to shipping operations would be prevented. Maps illustrating Route Option D were provided to the City in late August 2003, and additional copies were provided when the CPUC Project Manager attended the City Council meeting on September 2, 2003.

- Q-5 Route Option F was added as an option to the Modified Underground Existing 230 kV Alternative in order to eliminate impacts to business operations that could occur if the transmission line were installed in the access ramp/driveway from Baysore Boulevard to Van Waters and Rodgers Road.
- Q-6 Mitigation Measure T-3a (Section D.12.3.3 under Impact T-3, Physical Impacts to Roads and Side-walks) would ensure repair of damaged roadways after construction. Other specific requirements of the City would be incorporated into encroachment permit requirements when/if issued to PG&E.