

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES

provided. The text leads the reader to believe that impacts to less mobile species and ground nests are not as significant as those to mobile species. Both impacts should be treated equally as Class III, less than significant, with mitigation incorporated into MM B-5a to protect designated migratory birds and their nests.

PG-172

Impact B-6: Wildlife Disturbance from Human Presence

On Page D.4-43, ninth paragraph, the DEIR states that indirect impacts on wildlife could occur as a result of noise and human presence lowering the overall habitat availability and effectiveness of these areas. The impact of noise and human presence is short-term (especially with overhead construction) and as stated in the text "indirect." Also, with the surrounding expanse of open space to disperse to, impacts on wildlife will be less than significant.

PG-173

Impact B-7: Bird Electrocution and Collisions

On Page D.4-44, sixth paragraph, the DEIR states that bird electrocutions could occur at the Jefferson and Ralston Substations or with any low voltage power lines associated with these substations. Since these facilities are existing operational sites and there would be no significant increase in electrocution impacts as a result of the work that will take place in the substations, there is no project-related impact. This is an existing condition, not an impact

PG-174

PG&E Route Option 1B – Underground: Overhead Transmission Line Segment across San Mateo Creek

On Page D.4-54, third paragraph, the DEIR states that the potential for vegetation and wildlife impacts associated with installation and access to the transition stations is generally the same as those described for the towers of the proposed project, however the transition stations involve some new permanent vegetation impacts, through tree removal. In addition, the impact area associated with the transition stations is greater than with tower sites, and as noted in paragraph 2, construction of new access roads to the transition stations will result in temporary and permanent impacts. Existing maintenance roads can be used for the overhead lines and no new permanent roads are planned for construction of the Proposed Project.

PG-175

Modified 230kV Underground Alternative

On Page D.4-56, fourth paragraph, the DEIR states "as with the northern segment of the proposed project, this alternative has no recognized biological resource impacts except for the crossing of Colma Creek tributary, which will be bored... However, this alternative would avoid passing through San Bruno Mountain." This paragraph neglects to mention that the route passing through San Bruno Mountain is in the 4-lane paved road ROW of Guadalupe Canyon Parkway with only minor indirect impacts to resources.

PG-176

Four threatened or endangered species could be affected by construction of this alternative. North of San Bruno Ave. the alternative follows the existing San Mateo-Martin Transmission Lines corridor to the Transition Substation, then crosses west to Shaw Rd. In the corridor, the route parallels the San Bruno Channel, an extension of Cupid's Row Canal that passes through the San Francisco International Airport's West-of-Bayshore property. West of Bayshore supports several endangered species including a significant population of CRLF. Since the San Bruno Channel is contiguous with Cupid's Row Canal, CRLF would be expected to occur in it, if only occasionally. Dr. Sam McGinnis conducted trapping surveys for the CRLF in July, 1999 (McGinnis 1999). Neither species was found during surveys.

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES

However, he recounts several observations that indicate CRLF are present in the area. The route's location along the bank of the San Bruno Channel will probably affect the CRLF.

Based on two surveys done in the late 1970's, clapper rails have been known to occur at Point San Bruno. However, clapper rails were recently discovered much closer to PG&E's San Mateo-Martin transmission lines corridor, near the confluence of Navigable Slough (called "Colma Creek Tributary" in the draft EIR) and Colma Creek (EIP Associates, 2002). In addition, a black rail was discovered further out on San Bruno Pt. The CPUC was so concerned about this discovery that it imposed work restrictions on two towers of PG&E's San Mateo-Martin #4 Reconductoring Project, scheduled to be done in the fall of 2003. These towers are located about 200 ft. from the modified 230 kV underground alternative's proposed bore under the "Colma Creek Tributary." At the very least, this bore will require protocol surveys for the clapper and black rails, and consultation with the U. S. Fish and Wildlife Service and the California Department of Fish and Game.

PG-176

Description of Proposed Project and Alternatives

1. Proposed Project

P. 4.5 Crystal Springs is designated as a Game Refuge by CDF&G, not a Wildlife Refuge. Note that CDF&G does not manage this property.

PG-177

P. 4-5. The bay checkerspot butterfly has been extinct on San Bruno Mt. since at least 1986. In recent decades the mountain has been protected from grazing and fires, with the unfortunate side effect of encouraging increased spread of invasive herbaceous plants. Over the past decade rattlesnake grass (*Briza major*) and pincushion flower (*Scabiosa atropurpurea*) have spread aggressively, and the density of other non-native annual grasses has increased dramatically on the checkerspot's former habitat on the Southeast Ridge. The checkerspot will not re-invade San Bruno Mt. naturally, and reintroduction would not be successful unless preceded by extensive habitat restoration. Unfortunately, despite the plan operator's best efforts, restoration has not even kept up with the spread of non-native plants.

PG-178

This paragraph fails to mention the largest population of bay checkerspot butterflies in San Mateo County at Edgewood Park and the adjacent Triangle area.

P. 4.5. The San Francisco garter snake does not occur on San Bruno Mt. It was included in the Habitat Conservation Plan in order to provide coverage should one be found. However, several extensive trapping efforts have yielded no snakes, nor have there been any credible sightings. The northernmost population of this subspecies is located more than 2 miles to the south of the mountain.

PG-179

On Page D.4-5, Huddart County Park, This section discusses the regional parks that will be affected by the project, however, none of the retained alternatives comes close to Huddart Park and it should be taken out of the discussion, since there is no possibility of biological impacts to that area.

PG-180

On Page D.4-6, First and second paragraphs, the first bullet in the first paragraph, description of San Bruno Mountain topography, vegetation communities, etc. Since the route would be located in the road and disturbed road shoulder, this discussion should be put in context: these resources, while in the vicinity of the proposed route, are not found in the work area.

PG-181

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES

The first bullet, second paragraph discusses host plants for endangered butterflies. Since the project will be in the road, there will be no direct vegetation impacts and no impacts to host plants. Dust will not be significant since work is in road, with no off-road segments.

PG-181

On Page D.4-7, second paragraph, the DEIR states that Upper Crystal Springs Reservoir, Lower Crystal Springs Reservoir, and the San Andreas Reservoir lie along and within the overhead portion of the project. Please delete the word within, it is misleading in that only a single tower is located along the very edge of one reservoir.

PG-182

On Page D.4-8, second paragraph, the DEIR states that the majority of wetlands and aquatic features occur in the southern portion of the project area. It should also be mentioned that these resources are spanned by the current existing line and proposed projects. The third and fourth paragraphs regarding seasonal wetland and coastal/valley freshwater marsh do not specify if these habitats will actually be affected by the work at the tower sites; none are expected to be directly affected.

PG-183

On Page D.4-12, second paragraph, "include native grasslands, rock outcrops, and chaparral;" Rock outcrops are not plant communities.

PG-184

On Page D.4-5, 2nd bullet, the DEIR states the wrong scientific name for white-rayed pentachaeta (*Plagiobothrys diffusus*), it should be *Pentachaeta bellidiflora*.

PG-185

On Page D.4-13, fifth paragraph, it should be noted that in coyote brush scrub, Scotch broom (*Cytisus scoparius*) is far more common than French broom, although it is present.

PG-186

On Page D.4-14, second paragraph, first bullet, it should be noted that the Monterey pines present actually are nonnative trees in that were planted (most were originally raised in New Zealand) and are quite distinct from the few remaining native pines along the immediate coast, Carmel etc. They should not be viewed as sensitive and in fact concern has been expressed over genetic pollution and disease and pathogen harbors.

PG-187

On Page D.4-15, forth bullet, the DEIR states that "Newly defined project work areas (e.g., the cable pull sites or staging area that are located outside the 100-foot-wide survey corridor) that have not yet been surveyed would be surveyed prior to construction using accepted agency protocols for each plant species." Late season surveys were conducted by John Stebbins on July 12 and 19, 2003. Rare plant surveys were conducted at all appropriate times, based on the flowering or fruiting period of the plant. No plant special status plant species were found during those surveys. The state listed *Hesperolinon congestum* was found in spring surveys, reported to CPUC in Data Response ____ dated May 29, 2003. Text should be replaced with : "Botanical surveys, including early and late season surveys, were conducted for all ancillary sites and proposed new access roads. Only one special status plant species was found, in the vicinity of pull site number 29, as indicated in the attached figure."

PG-188

On Page D.4-17, first paragraph "Two are proposed for listing as threatened or endangered (Marin flax and white-rayed pentachaeta)." This is incorrect. The white-rayed pentachaeta was listed as endangered by the State of California in June 1992, and by the federal government on Feb. 3, 1995. The Marin dwarf flax was listed as threatened by both on the same dates.

PG-189

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES

On Page D.4-18, sixth paragraph, the DEIR states that this portion of the overhead alignment transects serpentine bunchgrass for significant distances. Replace the word “transects” with “spans”, which more accurately reflects the existing and proposed condition.

PG-190

On Page D.4-19 to D.4-22, Figures D.4-4 to D.4-7, The draft EIR uses the CNDDDB data in an inaccurate manner. The sensitive areas appear to be an amalgam of some of the CNDDDB records, and do not include data from the extensive field surveys performed for this project. This treatment distorts the value of two areas in particular: 1) the serpentine site at the North Buri Buri Ridge (CNDDDB Occurrence #23) is taken from a 1991 report by Toni Corelliⁱⁱⁱ. In it, the area is described as “small areas of serpentine surrounded by other substrates,” and also as occurring on southwest-facing slopes up to the ridge crest. We did not find serpentine grassland along the transmission line right-of-way at this site during our botanical surveys. We suspect that the serpentine grasslands mentioned in the CNDDDB occur on the slope above Hwy. 280, and possibly at the north end of the mapped occurrence. No rare plants were found at this site. Moreover, it was highly disturbed and had the greatest variety of exotic plants of any location on the right-of-way. 2) On the other hand, this treatment minimizes the value of Edgewood Park and the Triangle area. The extents used by the CNDDDB are the extents of the white-rayed pentachaeta and other rare plants, not the extent of serpentine bunchgrass, which is represented by a one-mile circle. In the triangle area, the sensitive habitat includes fine serpentine bunchgrass, some serpentine chaparral (an extremely rare type), three state and federally-listed endangered plants, and an endangered butterfly. One of the plants, the white-rayed pentachaeta, occurs no where else in the world (USFWS, 1998).^{iv} The area is remarkably free of weeds, and protected from public access.

PG-191

On Page D.4-23, fifth paragraph, the DEIR states that San Bruno Mountain is a biological island in an urban area and supports a relictual assemblage of plants and rare and endangered species. Mention should be made that the proposed route would be located under the road, which provides no habitat. Additionally, on Page D.4-25, Figure D.4-8, it appears as though the underground alignment cuts through the San Bruno Mountain HCD and it is not clear that the line is within Guadalupe Canyon Parkway, a paved, 4-lane highway for the entire length over the mountain. The map makes it appear that the line traverses pristine habitat.

PG-192

On Page D.4-31, APM-15, Trapping for the San Francisco garter snake was not done at the San Mateo Creek Transmission Line crossing area.

PG-193

On Page D.4-32, forth paragraph, “Each of these activities would cause the disturbance or removal of existing vegetation and the disturbance of surface soils.”, and “In addition, permanent loss of habitat would occur where new tower foundations are installed.” Add: The net permanent loss of habitat is equal to the surface area of the new tower foundations minus the surface area of the old foundations, which will be removed to below ground level, and the habitat restored.”

PG-194

On Page D.4-35, relevant language for 1601 permit is, “substantially change the bed, channel, or bank”, not merely “cross.”

PG-195

Appendix 5. On page A-5, third paragraph, which discusses Ricksecker’s Water Scavenger beetle, does not have a heading as do the discussions for other taxa. The paragraph (3rd from bottom) on the harvestmen should include the species name, *minor*, after the generic name

PG-196

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES

Calicina, when referring to the Edgewood Blind harvestman. There is no discussion on the other two harvestmen taxa in this paragraph.

One page D.4-5: Edgewood County Park section. Should mention that this is a known location for the two harvestmen species.

D.4-15: 2nd bullet from bottom, 4th line, add “,Ltd.” after company name.

Appendix 5A, page Ap.5A-2, last bullet, “Adjacent to San Francisco County Jail No. 3” and the north marsh of San Andreas Lake are two vastly different sites, separated by at least two miles and a lot of suburban development. Dr. McGinnis did not trap or see any CRLF in and around our San Andreas Lake north marsh edge traplines. This was probably due to the fact that the marsh dried to moist soil by the end of our survey in early July, and thus by the above criteria does not function as a CRLF breeding site. At the most one could expect that an occasional CRLF wanders through this area in the rainy season.

PG-196

PG-197

PG-198

PG-199

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES

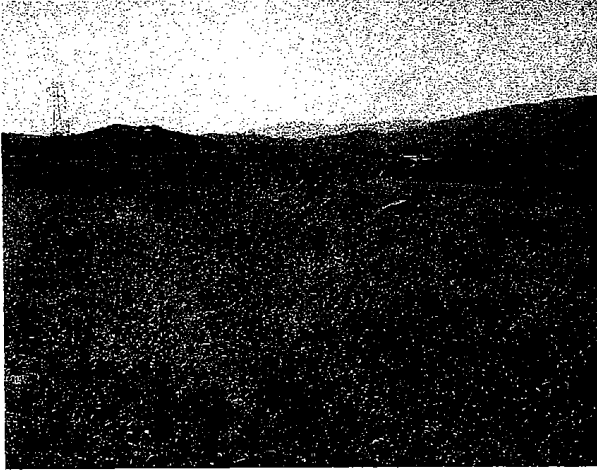


Figure 1. View south from near existing tower 6/33 shows little evidence of the 60 kV existing road, but does show serpentine grassland.

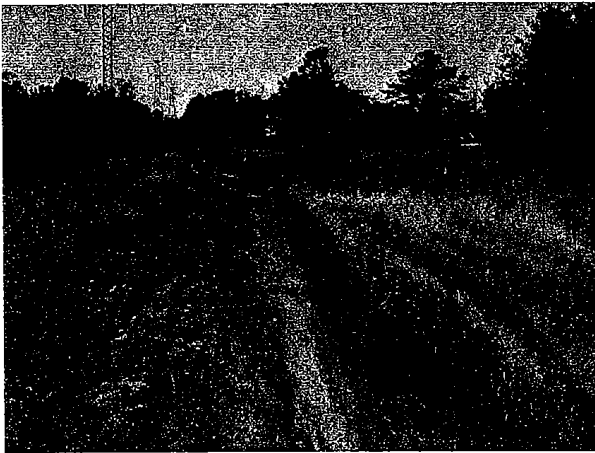


Figure 2. View north from near existing tower 10/66 shows near uniform Distribution of vegetation within and adjacent to the existing road

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27
023907-0037

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES



Figure 3. View North from Ralston Substation shows abundance of wildflowers within the existing roadbed.

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28
023907-0037

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES



Figure 3. *Pentachaeta bellidiflora*. Triangle area. March 26, 2002.



Figure 4. Triangle area. The white flowers covering the hillside are all *Pentachaeta bellidiflora*. March 26, 2002.

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29
023907-0037

Comment Set PG, Attachment A, cont.

BIOLOGICAL RESOURCES

- i U.S. Fish and Wildlife Service. 1998. Recovery Plan for Serpentine Soil Species of the San Francisco Bay Area. Portland, Oregon. 330+ pp.
- ii Corelli, Toni. 1991. Rare Plant Populations and Associated Natural Communities of the San Francisco Peninsula Watershed Lands – 1991 Survey Report. Prepared for the Nature Conservancy, San Francisco, California. n.p.
- iii Corelli, Toni. 1991. Rare Plant Populations and Associated Natural Communities of the San Francisco Peninsula Watershed Lands – 1991 Survey Report. Prepared for the Nature Conservancy, San Francisco, California. n.p.
- iv U.S. Fish and Wildlife Service. 1998. Recovery Plan for Serpentine Soil Species of the San Francisco Bay Area. Portland, Oregon. 330+ pp.

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30
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Responses to Comment Set PG – PG&E Attachment A: Biological Resources

PG-144 **Underestimation of Impacts to Serpentine Grassland Habitat from Partial Underground Alternative.** Regarding impacts from trenching in serpentine habitat, as would occur in the Partial Underground Alternative, the majority of this trenching would occur within the regularly disturbed existing road and disked firebreak areas which do not currently support sensitive vegetation or habitat. These areas are not considered fragile or highly sensitive due to the ongoing disturbance that occurs there, and the resulting degraded quality of habitat. Surveys conducted for the Bay checkerspot were negative in these areas. The disked firebreak (east of the dirt road) is cleared of vegetation by the SFPUC every summer; this area separates open space within the SFPUC property boundary from the adjacent residences.

Mitigation Measure B-1j is designed to reduce impacts to sensitive serpentine grassland in the vicinity of the trenching activity, but it is acknowledged that occasional deviations outside of the 40-foot wide corridor into sensitive habitat may occur along the underground route. This mitigation measure has been modified to define more clearly the protection and documentation requirements for work in this area. As stated above, the impact to sensitive serpentine grassland is considered a Class II impact, mitigable to less than significant levels through implementation of Mitigation Measures B-1b, B-1c and B-1j. The text of the DEIR in Section D.4.4.2 has been modified accordingly.

The degree of significance for impacts to serpentine grassland habitat for the Proposed Project was changed from Class I (unmitigable) to Class II (significant, but mitigable) because this habitat type can be, and has been, successfully restored following disturbance activities. Impacts to this habitat from the Proposed Project within Edgewood Park would be similar biologically to impacts to high-quality serpentine grassland along other alternative routes, both of which could be mitigated to less than significant levels through restoration. The impact significance for effects to serpentine grassland was also reduced to Class II due to the thorough and detailed avoidance, protection and restoration measures included in the Applicant's Proposed Measures.

Consistency in Impact Determination. Based on a review of the information provided in this comment and the Applicant Proposed Measures documented in EIR Table D.4-1, the impact conclusion for the Proposed Project, Impact B-1, under "Serpentine Grassland" has been changed to Class II, significant but mitigable to less than significant levels. Text has been modified in Section D.4.3.3 under Impact B-1.

Work Area Underestimated. Despite occasional deviations from the minimum 40-foot wide underground construction corridor prescribed under Mitigation Measure B-1j, the vast majority of the construction for the Partial Underground Alternative will be conducted in previously disturbed (disked and/or compacted) areas which are not considered to be highly sensitive. Any additional impacts to serpentine grassland habitat associated with trenching will be temporary and restored in accordance with Mitigation Measures B-1b and B-1c. However, it is agreed that given the likelihood of the corridor occasionally extending beyond the disturbed area into serpentine grassland, this impact is similar in nature to

Proposed Project impacts within Edgewood Park (modified, as stated above, to Class II impacts).

Much of the construction of permanent towers required for the Proposed Project would occur in high-quality serpentine grassland, and would result in more temporary construction impacts to serpentine grassland than the occasional deviations from the 40-foot wide underground construction corridor required for the Partial Underground Alternative. The commenter incorrectly quantifies the amount of disturbance to sensitive habitat as 220,000 square feet, or more than five acres. The actual amount of area that would be disturbed within the 40-foot wide underground construction corridor, even accounting for occasional deviations for gas line buffers and splice vaults, would be less than three acres (as stated in Section D.4.4.2), and only approximately one-third of this area is currently undisturbed (i.e., is not disked or not a road). Therefore, approximately an acre of sensitive habitat may be disturbed under this alternative, which is substantially less than the over five acres estimated by the commenter.

While the Partial Underground Alternative would create temporary impacts to serpentine habitats, it would not create permanent impacts in these areas because the transmission line would be installed underground. Under the Proposed Project, tower construction would result in permanent impacts to serpentine grassland and special status species habitat due to habitat removal. Permanent habitat loss would result from tower footings (areas of a few feet in diameter for each footing), but the entire area of the tower would be temporarily disturbed during construction. This area would range from 625 to 1,753 square feet. Temporary impacts to serpentine grassland habitat are considered preferable to permanent impacts from tower construction due to habitat removal because temporarily disturbed areas can be restored.

Intensity of Impact Underestimated. The implementation of Mitigation Measures B-1b and B-1c, along with the practice of “double-ditching,” is considered to be sufficient to restore disturbed soils and vegetation in sensitive habitats and prevent significant impacts. Serpentine plant species are primarily annual forb species or grasses which are generally shallowly rooted and only grow within the upper 2-6 inches of soil; therefore, proper backfilling of subsoil and topsoil following trenching should result in conditions that are similar to those resulting from soil disturbance from tower construction. In addition, the successful regeneration of serpentine grassland habitat along the adjacent gas pipeline ROW is evidence that restoration can occur following impacts to serpentine soil properties due to trenching.

Underestimation of Affected Habitat Values. The Partial Underground Alternative proposes trenching in an existing compacted dirt roadway and in a regularly disked area. Permanent impacts, which can result from alteration of soil conditions or hydrology from trenching within this roadway are considered minimal because the road is already a relatively disturbed and compacted area. The DEIR still acknowledges that trenching in the roadway would still result in temporary impacts to habitat and the text of Mitigation Measure B-1j has been changed to acknowledge, control and document temporary impacts to serpentine grassland may occur where work may occasionally deviate outside of the roadway where necessary. Between Ralston Substation and Tower 5/30 the route would be within the disked area and would enter the existing access road. Although some vegetation exists within and adjacent to the roadway, the vegetation in this area consists of primarily non-native and/or common grassland and forb species. These areas may contain nectar and host plants for the Bay checkerspot butterfly. However, the DEIR acknowledges that temporary

impacts to sensitive habitat may occur from trenching. Restoration of the area following construction will restore the area to a condition equal to existing conditions, if not better, since the existing condition is already regularly disked and/or compacted.

Disturbance of Undisturbed Grassland West of ROW. The minimum 40-foot width of the underground construction ROW would remain feasible for the majority of the segment, and maintaining the required 10-foot distance from the existing gas line would also remain feasible within this ROW. Occasional deviations from the 40-foot wide ROW into serpentine grassland habitat would result in temporary impacts and would not necessarily result in more impacts to habitat than the Proposed Project.

Infeasibility of Proper Revegetation of Increased Impact Area. In and adjacent to the roadway and within the disked firebreak, the use of alternative annual and/or perennial native grass seed (not necessarily from the immediate vicinity) would be adequate. Text was added to Section D.4.3.3 under Mitigation Measure B-3a, Erosion and Sedimentation, to describe revegetation of previously disturbed roadways and disked areas. This measure will require *Nassella* spp. to be used only within previously undisturbed habitats. The word “local” is not defined in terms of the native seed source; serpentine grasslands are extensive in this part of the San Francisco Peninsula and local commercial nurseries commonly collect native seeds for sale. These seeds could be used to supplement the restoration of additional areas. In addition, the argument that current availability of seeds and plants is insufficient and would result in unsuccessful restoration, and therefore a permanent impact, is not valid. Disturbed areas can be successfully restored following many years of disturbance and/or neglect. Regardless of when the restoration occurs, the performance criteria established in the restoration plan under Mitigation Measure B-1b must be met and should contain contingency measures in case of failure. Off-site mitigation (as restoration or enhancement) as a contingency measure in case of restoration failure is a common and often accepted practice.

PG-145 The DEIR acknowledges the impacts to biological resources from creating a new utility corridor within undeveloped portions of the SFPUC watershed in Section D.4.4.2, Partial Underground Alternative, under the heading “West of Burlingame/I-280 Overhead Segment” and also under “Comparison to Proposed Route Alternative, which identifies: “...(2) construction and access disturbance to a new area of the SFPUC Peninsula Watershed west of the I-280.” Application of mitigation measures for erosion control and tree removal to this alternative would reduce impacts to less than significant levels.

Southern Overhead Portion (south of Edgewood Road, along Cañada Road). Text has been added to Section D.4.4.2, under the Southern Alternative Segment-Overhead that describes in greater detail the high quality habitat found within the Triangle Area. Mitigation Measure B-1m has been added to require that the two new towers within the Triangle Area be sited to avoid endangered plants and to be located as close to Cañada Road as possible. In addition, the new measure requires that PG&E use tubular steel poles to reduce the size of the affected ground area within the Triangle, and that access within the Triangle to construct and maintain the towers will be through new gates installed along Cañada Road at the exact location of the tower to reduce impacts to adjacent habitat. Given the potential for spanning between towers, and according to the mapped extent of white-rayed pentachaeta within The Triangle given in the CNDDB, it is clearly feasible to place towers along Cañada Road 500 feet away from the pentachaeta as prescribed in the

recovery plan. To address the sensitive biological resources present in the Triangle Area, the Southern Alternative Segment-Overhead text under Section D.4.4.2 has been expanded in the EIR (see Section D.4.4.2).

- PG-146 Upland habitats in the vicinity of aquatic areas along the West of I-280 segment provide potential hibernation habitat for the San Francisco garter snake and upland dispersal and foraging habitat for the California red-legged frog. Effective application of proposed mitigation measures to eliminate or minimize impacts to vegetation and wildlife (Mitigation Measures B-1a through B-7a) and specific measures for special status wildlife species (Mitigation Measures B-8a and B-8b) would reduce potentially significant (Class II) impacts to special status species to less than significant levels.

Field surveys conducted for the EIR did not identify serpentine grassland in this area, even at existing helicopter sites. Serpentine grassland habitat was found in the existing 60 kV corridor east of I-280, adjacent to the residential areas of The San Mateo Highlands and the Town of Hillsborough. However, if found prior to construction along any area of the project area, Mitigation Measures B-1b (restoration for vegetation losses), B-1e (rare plant surveys), B-1f (protect sensitive habitats), B-1h (negotiate compensation for loss of significant plant communities) would apply and would ensure that impacts were less than significant.

- PG-147 Mitigation Measure B-2b has been added, recommending relocation of the southern transition tower for the crossing of San Mateo Creek in order to minimize tree removal in this area. The identification of Tower 6/37 as a transition tower was presented by PG&E (in Data Response 1), requiring undergrounding between Towers 6/36 and 6/37.

With the transition tower relocation as defined in new Mitigation Measure B-2b, effective application of APMs and other mitigation measures to eliminate or minimize impacts to vegetation and wildlife (B-1a through B-7a), and specific measures B-8a and B-8b, would reduce potentially significant (Class II) impacts to trees and breeding birds, and erosion impacts associated with undergrounding south of San Mateo Creek. A discussion of erosion potential in the San Mateo Creek area is presented in the Hydrology and Water Quality section, generally under Impact H-1 (soil erosion and sedimentation), and for the Partial Underground Alternative in Section D.7.4.2.

- PG-148 The measures presented by the commenter, as developed by Dr. Sam McGinnis, would reduce potential impacts to CRLF from construction across the top of Crystal Springs Dam to less than significant levels. Descriptive text and a new Mitigation Measure B-8c have been added to Section D.4.4.1, PG&E Route Option 1B-Underground, to include these specific measures to protect the CRLF on top of Crystal Springs Dam. This measure would apply to construction in the vicinity of the dam, regardless of the actual construction methodology. However, as also noted by Dr. McGinnis and consistent with information presented in the EIR, consultation with, and subsequent development of a Biological Opinion by the USFWS could delay the start of construction. Mitigation Measure B-8c (Crystal Springs Dam CRLF Protection) has been added to the Biological Resources section of the EIR and provides specific procedures to minimize impacts to the CRLF and their habitat located on the top of the Crystal Springs Dam.

Regarding the feasibility of the underwater cable, please also refer to Responses to Comments PG-149 and PG-150.

PG-149 Based on field review of the site where the entrance of the alternative underwater route through Crystal Springs Reservoir occurs south of Crystal Springs Dam, the slope between the access road and the lake margin was observed to be steep and densely forested, and may not be accessible to open-cut trenching methods. The section between the access road and the lake would cross a steep slope of fractured Franciscan sandstone. On the topographic map, the slope was measured as a 1:3.75 (15 degree) at a 1:24,000 scale (USGS topographic map). If the outlet of the trench is placed below the low water level, a temporary coffer dam could be put in place during construction to protect lake waters from excess turbidity and sedimentation caused by the trench construction. The steep slope appeared stable during our observations, but a more thorough investigation would be necessary to verify the long-term stability. Directional boring is considered to be feasible, despite the steep slopes, and would reduce sedimentation impacts that could occur with open trenching.

The northern part of this alternative route (the exit of the cable from the lake back to the access road) crosses a moderate slope of artificial fill over fractured Franciscan sandstone. Only the lower half is densely wooded; the upper half is grassland. Trenching in this location appears to be feasible.

Potential impacts to water quality and associated biological resources from cable installation is addressed in Section D.4.4.1 under Impact B-9 (underwater crossing around dam). This discussion references Mitigation Measure H-2a to prevent water quality degradation.

PG-150 Following an initial feasibility analysis, it appears that directional drilling of the southern entrance of the alternative route into the Crystal Springs Reservoir may indeed be feasible. If the slope at the southern entry of the alternative route really is 15 degrees, as was measured on the topographic map, the angle of the directionally drilled bore would be no greater than 20 degrees. In the field, this slope appeared steeper than 15 degrees. A detailed topographic map of the area at a scale of 1:2000 or so would provide a better representation of the actual slope. A curve could be engineered into the bore to allow a smooth exit from the slope onto the lakebed. As with the open-cut trenching method discussed above, a coffer dam could be temporarily installed around the outlet to catch the drilling mud before it mixes with the lake water. Installation of a coffer dam would also preclude the need for divers or boat-based work for the construction phase of the work.

The habitat in the vicinity of the proposed connection sites for the underwater cable to the underground transmission line north and south of the dam consists primarily of native serpentine grassland with a non-native component supporting scattered shrubs (coyote brush) and pampas grass, and stands of oak woodland habitat. The immediate shoreline between the grassland/woodland habitat and the waterline consisted of exposed gravel and rock, which is likely submerged when the reservoir is at full capacity. Impacts to serpentine grassland and potential impacts to trees and special status plant and wildlife species can be mitigated to a less-than-significant level through implementation of mitigation measures for Impacts B-1 through B-3, and B-6 through B-8.

Although emergent vegetation was not observed along this shoreline, and the reservoir may contain predatory non-native fish species, the site is considered potential habitat for the California red-legged frog; however, potential impacts to this species from underwater to underground cable connection construction can be mitigated to a less-than-significant level through implementation of Mitigation Measures B-8a, B-8b and B-8c.

- PG-151 The CNDDDB figures were included in the EIR only to give the reader a general sense of where biological resources were most dense. These graphics alone were not used for impact assessment; field evaluation and review of other documents was also completed. Please see also Response to Comment PG-145.
- PG-152 See Response to Comment PG-151.
- PG-153 Text was added to Section D.4.3.3, under Mitigation Measure B-1a (Perform Wetlands Delineation and Avoidance) to clarify when mitigation is applicable and to reflect that the other specific mitigation requirements will be required for federal and state agency (USACE and CDFG) permit applications. Some of the recommended mitigation language included in the comment was accepted but other portions (e.g., “to the extent feasible”) were rejected because such text allows too much applicant discretion and would prevent effective monitoring.
- PG-154 Text was added to Section D.4.3.3, under Mitigation Measure B-1b (Provide Restoration/Compensation for Vegetation Losses) to clarify that a draft Erosion Control and Revegetation Plan, and a Wetland Restoration Plan will be submitted to federal and state agencies according to the requirements of any necessary permits.
- PG-155 Text has been added to Section D.4.3.3, under Mitigation Measure B-1c (Protect Serpentine Grasslands and Edgewood Park) to reflect that the USFWS will also review the tower foundation report as part of the Section 7 consultation.
- PG-156 PG&E has completed surveys only for the Proposed Project, and this measure (Mitigation Measure B-1d, Perform Pre-construction Surveys and Provide Monitors) will apply to any approved route. Therefore, new surveys may be required if the approved route includes areas not surveyed by PG&E already. The measure has been clarified to state that if the Proposed Project route is approved, since botanical surveys have been completed, text was added to Section D.4.3.3, only wildlife surveys would be required. Also, the measure has been clarified to require flagging of sensitive resources, not all special status species habitat.
- PG-157 Text has been added to Section D.4.3.3, under Mitigation Measure B-1e (Complete Rare Plant Surveys) that concurs with the comment that a 50-foot distance is sufficient to protect rare plant populations. The text was also changed to reflect that other rare plant populations outside of the 50-foot margin but may be impacted by construction activities will also be flagged, as identified by the CPUC-approved biological monitor.
- PG-158 Text was added to Section D.4.3.3, under Mitigation Measure B-1f (Protect Sensitive Habitats During Construction) that concurs with the comment. Periodic maintenance access will have minimal impact to biological resources, and will be used by PG&E, Watershed employees, maintenance crews, or park staff.
- PG-159 Text has been changed in Section D.4.3.3, under Mitigation Measure B-1g (Implement Weed Control) such that equipment cleaning is required only prior to accessing off-road areas of high-quality habitat and/or which support a relatively low percent cover of weed species, as determined during development of weed management and monitoring procedures (prescribed in the measure) and enforced by the CPUC-approved biological monitor.

In response to vegetation clearing, the requirement for removal within 10 days of construction has been removed since concerns regarding erosion and revegetation are addressed in Mitigation Measures B-1b, B-1c and B-3.

In response to topsoil salvage, the text has been changed to require the upper 6 inches be stockpiled, and that areas with a significant weedy component may not be subject to topsoil salvaging requirements as determined by the CPUC-approved biological monitor.

In response to the requirement for using weed-free fill material, the text has been changed to require that only imported topsoil must be certified as weed-free.

PG-160 The roles and responsibilities of the CPUC-approved Biological Monitor will be defined and detailed as part of implementation of the Mitigation Monitoring Program, following project approval. General information regarding this program is presented in EIR Section G.

PG-161 Text has been added to Section D.4.3.3, under Mitigation Measure B-2a (Compensate for Tree Loss) to acknowledge that tree replacement should focus on Protected Trees (those trees protected under local and regional policies and ordinances).

The final evaluation of replacement trees has been changed to note that successful implementation of tree replacement shall be evaluated five years after installation of all trees (including any trees installed to replace dead trees during the five-year maintenance and monitoring period).

It is not appropriate to change the measure so that it does not apply to tree removal or trimming associated with ongoing operation and maintenance of the transmission line, as these phases of the project (along with construction) are considered to part of a single and complete project for which all potential impacts need to be addressed.

This measure was changed to clarify that the pre-construction tree surveys do not need to occur within or adjacent to the entire Project ROW; the surveys “shall determine the size and location of all trees located within and adjacent to the project work areas, staging areas, access roads and other active construction-related areas.”

PG-162 Text was modified in Section D.4.3.3, under Mitigation Measure B-3a (Restoration After Construction) to refer the reader to Mitigation Measure B-1b, which is very similar. The words “at least five years” were eliminated and the monitoring requirement was instead referred to Mitigation Measure B-1b. However, Mitigation Measure B-1b was changed to require that (1) contingencies in case of mitigation failure, such as off-site habitat creation or enhancement, shall be presented in the restoration plan, and (2) if the mitigation fails to meet the established performance criteria after the five-year maintenance and monitoring period, monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise noted by the jurisdictional agencies.

PG-163 Text was changed in Section D.4.3.3, under Mitigation Measure B-5a (Protect Wildlife During Construction) to require a 15-mph speed limit within the ROW and on non-public dirt access roads.

PG-164 There is no specific information available regarding the level of bird strikes within the Project Area; therefore, a study to determine impacts is warranted. Such a study would

provide valuable information for determining bird strike frequency on this and other projects. Line marking is the only method that has been shown to reduce bird strikes; however, line marking does not eliminate the impact completely. Waterfowl and waterbirds using the Crystal Springs area, both of which are largely nocturnal migrants, have been shown in one study to be among the most susceptible to line strikes.

Regarding PG&E's concern about timing of the study and potential delays in construction, the study may be initiated now (following appropriate consultation on protocol, as defined in Mitigation Measure B-7a) so that results would be available prior to construction. Given that construction is not expected to start until mid-2004 at the earliest (that is the estimated date for CPUC project approval), adequate time is available. Even if PG&E opts to wait until after project approval, most of the construction schedule will be used for tower (and possibly underground) construction, and the study could be completed concurrently with that construction phase, prior to conductor installation, which would be the final stage of construction. Therefore, the schedule concern is not considered to be valid.

PG-165 Text has been added to Section D.4.3.3, under Mitigation Measure B-8a (Protection for Special Status Wildlife Species-Harvestman) to clarify that the footings may be left in place.

Text has been added to Section D.4.3.3, under Mitigation Measure B-8a (Protection for Special Status Wildlife Species-Raptors) to allow for smaller buffers for nesting raptors on a case-by-case basis as approved by CDFG and/or USFWS. Resource agencies regularly require over 500-foot buffers for common species, including the red-tailed hawk. The buffer distance should be determined based on the species and the presence of existing visual buffers. Since raptors have been known to nest along high-traffic roads, surveys should be conducted in non-urban areas. Although raptors nesting along roads become habituated to vehicular traffic, they can be disturbed by the presence of stopped cars and pedestrians. This measure applies to all raptor species.

Text has been added to Section D.4.3.3, under Mitigation Measure B-8a (Protection for Special Status Wildlife Species-California Red-legged Frog) that concurs with the comment. Listed species should be translocated only when absolutely necessary, and then only under strict adherence with a Biological Opinion prepared by the USFWS. Habitat avoidance measures and seasonal construction alone will reduce impacts to acceptable levels. If, however, occupied habitat cannot be avoided, then the USFWS must be consulted to determine if translocation is necessary.

The DEIR states in Mitigation Measure B-8a that PG&E shall consult with USFWS/CDFG to determine appropriate mitigation measures.

Although western pond turtles are an aquatic species, they lay eggs in upland habitats often far from water. Nests in upland areas near turtle-occupied aquatic habitat could be impacted by construction activities.

Text was added to Section D.4.3.3, under Mitigation Measure B-8a (Protection for Special Status Wildlife Species-Harvestman) to clarify that some special status species surveys are seasonal.

PG-166 Text was added to Section D.4.3.3, under Mitigation Measure H-10b (Protect Water Quality from Lakeshore Operations) to require the use of coffer dams to protect water quality during

either trenching or boring adjacent to the lake. This directional boring technique appears to be feasible, although it is acknowledged that some water quality and habitat disturbance impacts (less than significant) could result.

PG-167 See Response to Comment PG-144. The text in Section D.4.4.2 has been changed to state that impacts to the Southern Alternative Segment – Overhead would be significant but mitigable (Class II), as would the Proposed Project in serpentine soils areas.

PG-168 Implementation of Mitigation Measure B-1j, even with occasional deviations from the 40-foot wide construction corridor, would not greatly exceed Proposed Project impacts to serpentine grassland since most of the corridor would be located in disturbed areas (annually disked fire break and compacted dirt road). See Response to Comment PG-144.

The text has been changed to state that the underground construction corridor will be determined and flagged by the monitor in coordination with PG&E; if work is necessary in serpentine grassland outside of the 40-foot corridor, Mitigation Measure B-1j will mitigate impacts for any required expansion.

The purpose of having the biological monitor present within 1,000 feet of ongoing construction activity is to ensure that the monitor is present in the vicinity of work and is close enough to observe construction activities and to prevent any potential encroachments on adjacent sensitive habitats. The 1,000-foot distance is intended to define what is meant by “in the vicinity” of work to avoid widely differing interpretations of when the monitor is “present.”

PG-169 Mitigation Measure V-20a does not apply to existing substations, but to newly constructed transition stations. The measure has been modified (see Section D.3.3.4, Visual Resources) to include input from a botanist to ensure that vegetative screening does not create new impacts to sensitive habitats.

PG-170 Mitigation Measure B-1l has been changed to state generally that the “Frac-Out Contingency Plan” shall describe monitoring measures to detect the release of drilling fluids into the tributary, which may include turbidity monitoring or use of non-toxic fluorescent dye. Monitoring methods will be subject to approval by the appropriate agencies (especially the CDFG), which will review the Plan.

PG-171 The text in the first paragraph of Section D.4.3.3 has been changed to clarify that additional studies prescribed in the mitigation measures will only be necessary in project areas that are changed or added during the final project design or in previously unstudied alternatives.

Text has been added to the second paragraph of Section D.4.3.3, under Impact B-1 (Temporary and Permanent Loss of Sensitive Vegetation Communities), to clarify that footing footprint areas represent the area disturbed during construction and not the actual extent of the footing itself.

Text has been added to Section D.4.3.3, under Impact B-1 (Temporary and Permanent Loss of Sensitive Vegetation Communities) to indicate that several stringing methods may be employed.

- PG-172 Text has been added to Mitigation Measure B-5a to include specific measures for the protection of ground-nesting birds.
- PG-173 Impacts as a result of increased human disturbance may include reduced reproductive success in local wildlife populations, including songbirds, small mammals, reptiles, and special status species. Disturbance from increased human presence is therefore considered a Class II impact, potentially significant but mitigable to less than significant levels.
- PG-174 Under Impact B-7, subsection on “Electrocution,” the DEIR concluded that bird electrocution impacts were considered less than significant (Class III), requiring no mitigation. Mitigation Measure B-7a is for collision, and an appropriate title has been added.
- PG-175 Impact B-2 for the Proposed Project states that trees may be permanently removed during construction of new towers; therefore, if trees were permanently removed for the alternative transition stations, this would be a similar impact to the Proposed Project. Similarly, other impacts associated with the Proposed Project are similar to those for the transition stations in terms of impact type. It is acknowledged that the towers differ in size from transition stations; however, towers are much more numerous in the Proposed Project than transition stations in the Route Option 1B “overhead crossing of the dam” option. Regardless, a sentence has been added to Section D.4.4.1 under “overhead crossing of the dam” to clarify that Impact B-2 (tree removal) may result from this crossing option, and that Mitigation Measure B-2a would ensure that the impact was less than significant.
- PG-176 The sentence referenced in this comment from the DEIR is actually on Page D.4-62 and not Page D.4-56. The description of the Modified Existing 230kV Underground Alternative impacts and mitigation in Section D.4.5.6 states that it “would be placed underground within an urban/commercial setting within paved roadways and parking lots, and adjacent to the UPRR ROW.”
- Implementation of Mitigation Measure B-8a, specifically for the San Francisco garter snake and California red-legged frog, will reduce potential impacts to these species to less than significant levels; however, this alternative is primarily located in existing development, so potential impacts are not expected to be substantial. Since this alternative does not require direct disturbance of California clapper rail habitat (tidal salt marsh), impacts to this species, especially where there is existing development and noise, are considered less than significant.
- PG-177 Text in Section D.4.1.2, under Protected Watershed Lands (Crystal Springs Park), has been corrected to indicate that Crystal Springs Park is a Game Refuge.
- PG-178 Text has been added to Section D.4.1.2, under Protected Watershed Lands (San Bruno Mountain State and County Park) to indicate that the Bay checkerspot is unlikely to occur on San Bruno Mountain.
- PG-179 Text has been added to Section D.4.1.2, under Protected Watershed Lands (San Bruno Mountain State and County Park) to indicate that the San Francisco garter snake is unlikely to occur on San Bruno Mountain.

- PG-180 The intent of the DEIR is to characterize habitats and species found in the region. The discussion on Page D.4-5 includes the largest and closest parks along the proposed route. No impacts are identified in Huddart County Park.
- PG-181 This section intends to describe Special Habitat Management Areas along the proposed route, and is not a discussion of potential impacts. Potential impacts in the San Bruno Mountain area are addressed in Section D.4.3.4, 230 kV Underground Transmission Line.
- PG-182 Text was added to Section D.4.1.3, under Plant Communities and Sensitive Habitats within the Project Area (Open Water) to indicate that the overhead portion of the proposed route is not located within open water habitat.
- PG-183 The discussion referenced in the comment describes habitats along the proposed route as part of the environmental setting, and is not a discussion of potential impacts. Impacts are addressed in D.4.3.3.
- PG-184 Text has been added to Section D.4.1.3, under Plant Communities and Sensitive Habitats within the Project Area (Serpentine Habitats) to indicate that rock outcrops are not plant communities but that several serpentine-associated plants do regularly occur on rock outcrops.
- PG-185 Text has been changed in Section D.4.1.2, under Special Habitat Management Areas (Edgewood County Park) to provide the correct scientific name.
- PG-186 Text has been changed in Section D.4.1.3, under Plant Communities and Sensitive Habitats within the Project Area (Coyote Brush Scrub) to indicate that Scotch broom is also common.
- PG-187 Monterey pine forest is discussed as a non-native plant community in Section D.4.1.3, under Plant Communities and Sensitive Habitats within the Project Area (Non-native Plant Communities and Habitats).
- PG-188 Text has been changed in Section D.4.1.4, under Special Status Plant and Wildlife Species within the Project Area to indicate that plant surveys were completed in the newly defined areas.
- PG-189 Text has been changed in Section D.4.1.5, under Sensitive Biological Resources Documented in Project Area (Overhead Segment-Proposed Project) to indicate correct listing status.
- PG-190 Text has been changed in Section D.4.1.5, under Sensitive Biological Resources Documented in Project Area (Ralston Substation to Carolands Substation) to more accurately reflect existing and proposed conditions.
- PG-191 See Response to Comment PG-145
- PG-192 Under Section D.4.1.5, under Sensitive Biological Resources Documented in Project Area (Underground Segment-Proposed Project), the DEIR states that no wildlife habitats would be directly affected by the underground portion of the alignment. This section describes this segment as situated within existing streets or disturbed ROWs.

- PG-193 In response to this correction of PG&E's Applicant-Proposed Measure Bio-15, the text in Table D.4-1 has been modified delete the bullet stating that trapping was conducted in Spring of 2003 at the San Mateo Creek Transmission Line crossing area.
- PG-194 Text has been changed under Impact B-1 (Section D.4.3.3) to reflect the recommended addition regarding net habitat loss.
- PG-195 Text has been changed in Mitigation Measure B-1a to reflect the recommended language regarding 1601 permits.
- PG-196 The following modifications have been made to the third paragraph on page Ap.5A-5:
- Six special status invertebrates potentially occur in the Project Area (Appendix 5C). Invertebrates such as Ricksecker's water scavenger beetle and the serpentine phalangids also occur in the Project Area.
- Ricksecker's Water Scavenger Beetle. The water scavenger beetle
- In the fourth paragraph on page Ap.5A-5, remove "and Serpentine Phalangid" from the heading, and insert "minor" after the second use of Calicina.
- Add the following to the fourth paragraph:
- The Edgewood microblind harvestman (*Microcina edgewoodensis*) is able to withstand xeric conditions better than most harvestman species. It is found in open grassland habitat, typically under medium to large serpentine rocks undisturbed in the soil. This species is named after its type locality, Edgewood Park in San Mateo County.
- PG-197 Text was changed in Section D.4.1.2 to state that Edgewood Park is a known location for two harvestmen species.
- PG-198 Text has been changed in Section D.4.1.4 to insert "Ltd." after Entomological Consulting Services.
- PG-199 Text of Appendix 5 has been modified on page Ap.5A-2, as follows: Change the sentence before the first bullet as follows:
- Areas near the Project Area that may support breeding populations of California red-legged frogs include:

Comment Set PG, Attachment A, cont.

Public Services and Utilities

1. General Comments

1.1 Modified Existing 230 kV Underground ROW: Comparison to Proposed Route Segment

DEIR page D.14-26, paragraph 1

“This alternative would have similar types of utility disruption impacts to the proposed route segment, but the alternative route is substantially shorter than the Proposed Project. Therefore, it would decrease the extent of construction impacts in comparison to the Proposed Project.”

The DEIR understates the potential adverse impacts of the Modified Collocation Alternative by Equating utility disruptions to length of route. This analytical approach fails to take into account the potential for qualitative differences in the routes, which significantly understates the potential adverse impacts of the Modified Collocation Alternative. For example, specific constrained areas, such as the Gateway to Bayshore Boulevard segment of the Modified Existing 230kV Underground ROW. In that area, the route parallels the existing Caltrans ROW, where their Master Plan calls for adding in 2 additional tracks. The railroad is immediately adjacent to the access road to 2 Marriott hotels, and businesses along Van Waters and Rogers Road.

Constructing the 230 kV line down a heavily congested corridor will cause many construction delays. Since utilities are not well defined underground, many unexpected encounters will occur. The Agencies and the City may require the reconstruction of the existing utility and entire roadway section as part of the mitigation. This will significantly increase the cost of the alternative through increased work and a delay in construction. See Traffic and Transportation for additional detail on the impacts of this congested corridor.

2. Specific Comments

2.1 Modified Existing 230 kV Underground ROW (Potentially infeasible alignment due to fire service requirements)

DEIR page D.14-25, paragraph 4

“Siting this alignment through a largely industrial and commercial area reduces the potential for impacts to parks, schools, hospitals, and other public facilities, but construction within road ROWs could disrupt access for emergency vehicles (Impact U-2). Implementation of Mitigation Measure T-6a (see Section D.12) would reduce impedance of emergency access impacts resulting from this to less than significant levels (Class II).”

PG-200

PG-201

Comment Set PG, Attachment A, cont.

PUBLIC SERVICES AND UTILITIES

In the Oyster Point area, the Modified Existing 230 kV Underground ROW alignment narrowly passes between the railroad ROW and the Marriott Courtyard and the Marriott Residence Inn. Trenching would have to avoid existing utility corridors and also meet local South San Francisco Fire Department requirements. According to the SSF Fire Department, access for emergency vehicles must be maintained at all times at a minimum of 12 feet; project construction cannot occur if a 12-foot minimum access for emergency vehicles cannot be maintained. Without specific knowledge as to where the utilities are along the railroad ROW, PG&E cannot guarantee access to emergency vehicles at all times. If access is impossible to maintain, the alignment at that point is infeasible. If utility corridor locations allow for emergency access, regular public traffic would still be prohibited in the area, effectively closing down both hotel businesses for the duration of construction—approximately 3 to 6 weeks. This would be considered a significant, unmitigable impact (Class I).

Further along the Modified Existing 230 kV Underground ROW, the alignment again narrowly passes through the parking lots and sole-entrance of two trucking companies. The Brisbane Fire Department requires a minimum access lane of 20 feet for their fire and emergency vehicles. Avoidance of existing utility corridors and trenching for the project is feasible with 20 feet to spare. However, trucks would be unable to park in the 20-foot access lane, effectively rendering them unable to load materials at the building's docking gates. In addition, a large pit for the underground bore at that location would be situated at the round parking lot at the end of the building, restricting trucks from turn-around ability for approximately 6 weeks. For these reasons, the trucking company located at the end of the building would therefore be restricted from all business for approximately 6 weeks. This would be considered a significant, unmitigable impact (Class I).

PG-201

3. Clarifications and Minor Comments

None.

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Responses to Comment Set PG – PG&E Attachment A: Public Services and Utilities

PG-200 As described in Response to Comment PG-45, the EIR does not ignore the qualitative characteristics of the Proposed and alternative routes. The analysis accounts for other factors such as use and congestion of the ROW surface and below-surface congestion of existing utility lines. The EIR Team researched utility congestion concerns as part of the alternatives screening process to determine existing utilities and available space within the roadways. In addition, the Proposed Project and alternative routes were examined for Underground Service Alert utility markings. Route Options A through E have also been developed to avoid utility and business congestion.

Both the Proposed Underground Route and the Modified Underground Existing 230kV Collocation Alternative pose similar challenges to the installation of the project. Both routes are subject to traffic patterns that range from light to heavy depending on the time of day and location, both routes include portions of ROWs heavily congested with underground utilities, and both routes include construction within railroad ROWs which could conflict with maintenance and construction for BART and Caltrans lines, as well as the construction of two additional tracks in the Caltrain ROW. While the construction of the 230kV line down a heavily congested corridor such as proposed in the Collocation Alternative could face unexpected delays, so could the construction of the 230kV line down the heavily congested corridors within the Proposed Underground Route. Construction in the Collocation Alternative could require reconstruction of existing utilities and roadway sections as mitigation, but it is not anticipated that this mitigation would result in further utility impacts. With this in mind, the Collocation Alternative would remain having less potential for utility impacts compared to the Proposed Project.

PG-201 The CPUC disagrees that emergency and business access impacts would be significant and unmitigable. Careful coordination, as required by a number of recommended mitigation measures, should allow construction to proceed without creating significant impacts to these businesses. Mitigation Measure L-7c (Provide Continuous Access to Hotels) has been added to Section D.2.4.5 to ensure that hotel access can be maintained during construction.

It is acknowledged that the proposed alignment for the Modified Underground Existing 230 kV Collocation Alternative may require minor modification based on the location of other utilities along the railroad ROW. However, proper coordination with emergency service providers as required by Mitigation Measure T-6a (Ensure Emergency Response Access) will ensure that construction can occur in a manner in which emergency access can be guaranteed at all times without restricting surrounding businesses. Mitigation Measure T-6a is not simply limited to the use of plating over excavations, but also includes the development of provisions to accommodate emergency vehicles with alternative routes and short detours. The development of these provisions would be made through notification and coordination directly with emergency service providers and in conjunction with the Traffic Control Plan required in Mitigation Measure T-1a (Prepare Transportation Management Plans). This coordination would ensure that the alignment would be viable and feasible.

Please also refer to Responses to Comment Sets CC11 and CC12. With implementation of Mitigation Measures L-7a (Provide Continuous Access to Properties), L-7b (Coordinate with Businesses), and L-7c (described above) a construction schedule should be able to be developed to minimize impacts to the businesses, including entranceways. The mention of “turn-around areas” has been added to the text of Mitigation Measure L-7a in the Final EIR. In addition, Route Option D for the Modified Existing Underground 230 kV Collocation Alternative has been developed, which would avoid the ramp to Bayshore Boulevard on Van Waters and Rodgers Road and eliminate construction disturbance issues by continuing 200 feet or less farther north in railroad ROW before turning west onto Bayshore Boulevard.

Comment Set PG, Attachment A, cont.

Land Use

1. General Comments

1.1 Mitigation Measures for Impact L-7, Disrupted Access to Businesses and Residences (Mitigation Measures L-7a and L-7b)

Page D.2-34, paragraphs 2, 3, and 4

“L-7a: Provide Continuous Access to Properties. PG&E or its construction contractor shall provide at all times the ability to quickly lay a temporary steel plate trench bridge upon request to ensure driveway access to businesses and residences, and shall provide continuous access to properties when not actively constructing the underground cable alignment.

L-7b: Coordinate with Businesses. Where private parking lots would be effectively blocked during construction, PG&E shall either make prior arrangements with the business owner(s) to provide alternative parking within reasonable walking distance (i.e., no more than 1,000 feet), or shall coordinate the construction schedule so as to prevent disrupting the functions of the business(es).”

Although PG&E acknowledges the importance of minimizing disruption to businesses and residences, the requirement to provide “at all times the ability to quickly lay a temporary steel plate trench bridge” is not feasible for the PG&E Route Option 1B Alternative and other underground alternatives. The installation of the temporary steel plates could easily take up to an hour or more depending on the amount of work required to stop on-going operations, and prepare for the installation. While every attempt will be made to accommodate businesses or residents, the frequency of requests would impact the construction schedule and costs. Also, this measure raises the expectation on immediate action; work cannot always be suspended without significant implications to worker and public safety (e.g. during shoring of the trench, dewatering in contaminated groundwater areas or removal of contaminated soils), as well as to schedule. Placing and moving steel plates can also have impacts to traffic flows where lanes or intersections could be blocked. The mitigation measure should require only a notification be sent to affected businesses and residents in advance of blockage; this would allow them to make parking/access arrangement in advance. As noted in the PEA, these disruptions would be short-term for any given location.

Other issues such as construction staging, the need for Baker tanks to store groundwater, and the general lack of parking availability in certain areas may not make maintaining access to all properties and providing alternative parking within 1,000 feet physically possible at all times (See also Transportation and Traffic). Vault locations, and boring and receiving pits are too large for steel plates. Alternative plans would need to be arranged by the businesses and residents.

Proposed revisions: Replace Mitigation Measure L-7a with the following: In addition to general construction notification, PG&E or its construction contractor shall provide 48 hours

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PG-202

Comment Set PG, Attachment A, cont.

LAND USE

notice to businesses or residents that may have their access blocked during construction and allow them to make alternative arrangements. Access to driveways will be restored through the installation of steel plates at the end of each construction workday. Construction plans will be developed to minimize driveways blocked during the workday. The notification shall include information on restoring access and the estimated amount of time to install the steel plates.

PG-202

1.2 Mitigation Measures for Impact L-4, Construction Noise, Dust, and Odor Impacts on Residents

Page D.2-47, paragraph 2

PG-203

“L-4d: Maximize Distance from Residences. The Modified Underground Existing 230 kV Collocation Alternative alignment shall be revised to maximize the distance from San Bruno residences north of San Bruno Avenue [along Seventh Ave]. This objective can be achieved by placing this segment of the transmission line within the existing PG&E 115 kV right-of-way as far east as possible. At least 60 days prior to construction, PG&E shall submit construction plans to the CPUC for review and approval to document compliance with this measure.”

PG&E needs to study locating the line “as far east as possible” to determine whether it is feasible and also to ensure that this will not result in alternative environmental impacts to sensitive species or their habitat, present along Cupid Row Canal. It may not be possible or advisable to revise the alignment in this location due to space constraints, setbacks, or sensitive species habitat. As a result, this measure may not be feasible. In addition, the second part of this measure that requires approval of PG&E’s construction plans 60 days prior to construction is inappropriate; PG&E will submit construction plans to CPUC for the record.

Proposed revisions: Add “if possible” after “shall be revised” in the first sentence. Add “if they are determined to be feasible” at the end of the sentence. Change the last sentence to “To comply with this measure, PG&E shall submit to the CPUC construction plans showing the revised routing through this area or documentation for why they were unable to revise the alignment if the revision is not feasible.”

1.3 Environmental Impacts and Mitigation Measures for the Route 1B Alternative

Page D.2-33, first paragraph, last sentence

PG-204

“The alternative also incorporates options for crossing the dam (including the underwater cable option) that would avoid this conflict with sensitive resources on the dam.”

It may not be possible to cross the dam underwater, so the conflict with sensitive resources on the dam may be unavoidable. As a result, this alternative may be in conflict with the County’s policy. However, implementation of mitigation measures listed in the Biological Resources comment section would reduce this impact to less than significant (Class II).

Comment Set PG, Attachment A, cont.

LAND USE

1.4 Impact L-6: Transition Station Conflict with Planned Future Development

Page D.2-29, D.2.3.4

"The proposed transition station would be visually incompatible with existing and planned surrounding land uses, including residences and neighborhood commercial development. This impact is discussed in section D.3, Visual Resources. Although the transition station would not conflict with the Zoning Ordinance or with any actual existing established land uses or with the General Plan, it would conflict with an approved future use, which is treated as an existing use, as described in the following impact

D.2-30, second paragraph: "The transition station would be inconsistent with planned Open Space designation (the approved parking lot would be consistent) and would be incompatible with the anticipated townhomes directly across the street. In addition, the City plans to redesignate the southeast corner of the San Bruno/Glenview intersection as Mixed Use. It is anticipated that the existing shopping center there may be redeveloped in the future with a mix of residential and commercial uses."

Page D.2-30, last paragraph in section: "Based on the above conflicts, including a conflict with what is considered an established land use, this would be a significant impact (Class I). The impact could be eliminated with an alternative transition station site or the Route Option 1B Alternative, discussed in Sections D.2.4 and D.2.5, but it would not be mitigable at the proposed site."

These statements do not provide justification for why a landscaped transition station would be incompatible with an intent to redevelop, or why the transition station would be incompatible with future uses. Please note the visual simulation presented in the Draft EIR overestimates the visual impact of the transition station, as described the Visual Resources comments with attached simulations.

Transition stations, substations, and other utility infrastructure are not considered incompatible with residential and commercial land uses and are often incorporated into these areas since they are necessary to provide power to these uses. As stated above, the transition station impact will be significantly less than portrayed in Figure D3-19b of the Draft EIR, and should not be considered in conflict.

The area can probably be designed to accommodate the needed parking, however the total number of parking spaces is unknown at this time. The description of the Open Space designation in the General Plan is silent as to whether either a parking lot or transition facility would be considered incompatible with the land use designation. PG&E believes the transition station is not in conflict with the Open Space designation.

1.5 Modified Underground Existing 230 kV Collocation Alternative—Maintaining Access

D.2.5.6, Environmental Impacts and Mitigation Measures

Pages D.2-46, paragraph 2

PG-205

PG-206

Comment Set PG, Attachment A, cont.

LAND USE

“Although this alternative appears to pass by a greater number of businesses, the degree of disturbance and disruption may be smaller, due to greater setbacks, less-sensitive businesses at some locations, and the fact that the alternative route is 3.7 miles shorter.”

PG-206

As described in detail in the Traffic and Transportation, impacts to land uses along this route could be significant, but have been erroneously characterized as less severe than the Proposed Project. Impacts will involve disruption to three major hotels (Marriott Courtyard, Marriott Residence Inn, and the Homewood Suites SFO Airport). The Marriott hotels may have to be closed during construction due to the potential infeasibility of maintaining emergency access to the area. The Van Waters & Rogers and Cal-Rite trucking facility would likely have significant loading dock closures associated with use of the boring pits and trenching along Van Waters and Rogers Road. Van Waters and Rogers Road, a private road, would require a temporary easement. Maintaining access to all of these properties at all times does not appear feasible, and Mitigation Measure L-7a may not be feasible. As a result, impacts should be characterized as Class I.

1.6 Comparison of the Partial Underground Alternative to the Proposed Route Segment

PG-207

D.2.4.2 Partial Underground Alternative
Page D.2-36, second and last sentences of section

“However, this benefit would be offset by greater biological impacts in serpentine soils areas where undergrounding would occur. The elimination of towers from Edgewood Park and the Pulgas Ridge Preserve would result in an overall benefit in terms of compliance with County policies regarding biological resources.”

The statement is inaccurate; as stated above, the existing towers are not located in the Pulgas Ridge Open Space Preserve. The Partial Underground Alternative will have significant biological impacts in its new location that have been greatly underestimated in the DEIR, as described in detail under the Biological Section comments. These impacts are not offset by removal of towers in Edgewood Park, since the existing towers have little on-going impact on biological resources. The conflict with policies requiring protection of biological resources will not be reduced, so there would not be an overall benefit in terms of compliance with the policies.

1.7 Standards of Significance

Page D.2-25, Second bullet

PG-208

“Create long-term disturbances that would disrupt an established land use.”

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4

Comment Set PG, Attachment A, cont.

LAND USE

"Long-term" in the second bulleted criteria regarding disturbances to established land uses should be more clearly defined. Many of the impacts termed potentially significant in the analysis refer to short-term impacts (days or weeks) that would occur during construction at any given location; these would be more properly classified as Class III impacts under this definition, rather than as Class II impacts they have been termed in this analysis. This may affect how impacts are characterized in terms of significance throughout the document.

PG-208

1.8 Standards of Significance

Page D.2-25, second to last bullet

"...Adversely affect sensitive receptors, such as residences, schools, libraries, hospitals, nursing homes, or other facilities with populations of the sick, elderly, or very young..."

PG-209

Impacts that would "Adversely affect" sensitive resources in the third bullet should be defined. Does this refer to adversely affecting noise, air quality, access, etc.? This affects how the impacts are characterized in the impact analysis, and should be more clearly spelled out.

1.9 Mitigation Measure L-4c: Provide Compensation to Displaced Residents

Page D.2-32, top of page

"...PG&E shall provide to the CPUC a statement documenting that an agreement has been reached with each affected landowner [required by helicopter use] at least 30 days prior to the start of construction."

PG-210

Temporary construction easements to vacate an area or residence will be negotiated with each affected landowner before the start of helicopter operations. However, if negotiations are unsuccessful, PG&E may need to exercise the power of eminent domain to maintain schedule, prior to construction at that area.

1.10 Impact L-9: Disruption of Commercial Parking Lot

D.2.5.6 Modified Existing 230kV Underground ROW

Environmental Impacts and Mitigation Measures, Page D.2-52, paragraph 1, Line 7

PG-211

The Draft EIR states that this impact (disruption of parking lot) does not meet any of the significance criteria established in this section, and categorizes the impact as a Class III impact. Nonetheless, a mitigation measure is required that consists of compensation to the parking lot owner for loss of use. Since under CEQA, the loss of revenue due to the temporary disruption of parking space use is not an environmental impact, a mitigation measure addressing the loss of revenue is not appropriate here. PG&E will, as part of their negotiations for easement, negotiate an agreement with the landowner; however, neither the monetary impact nor the mitigation is appropriately discussed as an environmental impact and mitigation.

As noted in the Traffic and Transportation General Comment 1, disruption to more than just this business will occur as a result of this alternative. These businesses, the anticipated disruption to the physical access to these businesses, and the related inability to maintain emergency access to the hotel area should be referred to in this section.

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5