

February 27, 2003

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

RE: Jefferson-Martin Transmission Line Project Application no. A-02-09-043

The local chapter of the California Native Plant Society is concerned about the impacts to native species and habitats that occur along the proposed transmission line project.

Within the environmental assessment although it states on page 6-5 that "assess all threatened, endangered, and sensitive plant populations", not all sensitive plant populations are included in Table 6-3. Some of the sensitive plant populations not listed are:

Allium peninsulare var. franciscanum	Franciscan onion	List 1B
Arabis blepharophylla	coast rock cress	List 4
Calochortus umbellatus	Oakland star-tulip	List 4
Collinsia multicolor	San Francisco collinsia	List 1B
Dirca occidentalis	western leatherwood	List 1B
Elymus californicus	California bottle-brush grass	List 4
Eriogonum luteolum var. canium	Tiburon buckwheat	List 3
Erysimum franciscanum	San Francisco Wallflower	List 4
Fritillaria biflora var. ineziana	Hillsborough chocolate lily	List 1B
Linanthus ambiguus	serpentine linanthus	List 4
Malacothamnus arcuatus	arcuate bush mallow	List 1B
Perideridia gairdneri ssp. gairdneri	Gairdner's yampah	List 4
Tauschia howellii	Howell's tauschia	List 1B

This list was compiled based on personal knowledge of these populations within the area of the proposed project and using the "Special Plants" list from the Department of Fish and Game's California Natural Diversity Database (CNDDB). All of these plants are known to occur or have the potential to occur in the transmission line route.

We are concerned about trampling caused by trucks, workmen, and staging of tools or materials that will have a detrimental affect on this critical habitat. Bringing in heavy equipment to rebuild or extend the existing towers and handle the expansion as described will have a devastating impact on this sensitive habitat and its sensitive species. Evidence of this can be seen from the existing maintenance along the powerlines.

The digging of trenches or digging out concrete footings encourage invasive weeds. Once established, they push out native plants and their impact can be seen for years.

We are in favor of more emphasis, both environmental assessment and the feasibility of the Alternative Segment 1B - Underground Route Alternative putting the power lines under current existing road beds. Alternative 1B for this project would underground the proposed new transmission lines under Canada Road and Skyline Boulevard. This seems to be more visually pleasing and has the potential for less environmental impact. It would also avoid future intrusion into

this sensitive area for maintenance and/or replacement of power line equipment. If this alternative is used it is recommended the existing towers be removed by helicopter and the concrete footings be left in place to avoid more disturbance to the surrounding sensitive areas.

Thank you for your consideration regarding this matter,

*Toni Corelli*

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