



CITY OF DALY CITY

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March 17, 2003

Ms. Billie Blanchard
CPUC Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

SENT BY ELECTRONIC MAIL
bcb@cpuc.ca.gov

- Re: Jefferson-Martin 230 kV Transmission Line Project (A-02-09-043)
- Notice of Preparation of Environmental Impact Report
 - Application for Certificate of Public Convenience and Necessity

Dear Ms. Blanchard:

Thank you for granting Daly City's ("City") request for a brief extension of time to comment on PG&E's Jefferson-Martin 230 kV Transmission Line Project ("Project"). The City's comments include a request that the DEIR include additional mitigations along Segment 4 (Hoffman-Orange St.) of the Project and evaluate an alternative along Segment 5 (Guadalupe Canyon-Bayshore).

Hoffman-Orange St. [4A] of Segment 4

Initially it should be noted that within the Project's Proposed Environmental Assessment at page 3-19, §3.3.2.2, *Conclusion North Area Component Alternatives*, the document states that PG&E prefers that the North Area Component be comprised of Route Options 2B, 3A, **4B** (East Market) and 5. This seems to be inconsistent with other sections of the Final PEA which identifies Route Option 4A [Hoffman-Orange] as the selected route. The City believes this is simple error within the PEA; and the City supports the 4A option.

However both Hoffman St. and Orange St. are established urban residential streets, narrow in width and serving as primary access to the Hillside Neighborhood and the Franciscan Mobilehome Park. The proposed construction period of 6 to 7 months (Table 2-9, page 2-68) needs to be reduced to several weeks. The City requests significant advance notice and coordination; neighborhood informational meetings hosted by PG&E as necessary; an onsite representative available to address local concerns during construction; and commute traffic control as necessary.

Guadalupe Canyon Parkway - Segment 5

The final segment of this Project proceeds from East Market Street in Daly City northeast within the Guadalupe Canyon Parkway right-of-way for 3.7 miles, turns north on Bayshore Boulevard for 0.7 miles to enter the southern side of the Martin Substation south of Geneva Avenue. The underground transmission line would consist of cables in a buried concrete-encased duct bank system. Modifications within the Martin Substation are also proposed to accommodate these new transmission circuits.

PG&E overhead transmission lines already cross over Guadalupe Canyon Pkwy at its intersection with Carter Street---and again 2500 feet east of Carter Street, with these overhead lines parallel and adjacent to Guadalupe Canyon Pkwy between the two cross-over points. At the eastern cross-over point, the combined aerial lines go directly to the Martin Substation above public streets and residences. Guadalupe Canyon Pkwy in this area is at the southern boundary of the Bayshore Redevelopment Project Area; the transmission lines going from the parkway to the Martin Substation follow a PG&E easement through a residential street within this Project Area.

The existence of overhead power lines is often a defining condition of redevelopment *blight*; eliminating overhead lines from a project area is a redevelopment priority.

The same overhead lines and support towers also lie within the endangered species environs governed by the San Bruno Mountain Habitat Conservation Plan ("HCP"). Routine and emergency inspection, repairs and maintenance of the towers and lines are necessary, but require human and mechanical entry into conserved habitat. The towers themselves apparently create a minor barrier to endangered butterfly movement.

PG&E currently owns in fee and has an adjacent easement directly from Guadalupe Canyon Pkwy down to the Martin Substation (see attachment). The City believes this was initially considered as the route for the Project, but rejected this alternative because of the permitting constraints of the HCP. The City would like this direct alternative reconsidered both environmentally and as

part of the PCN process, however with the existing overhead lines described above included as part of the undergrounding.

Currently there is an unrelated amendment to the HCP under consideration by the Plan Operators. The City proposes this combined undergrounding alternative become part of the current HCP amendment with the habitat benefits to include tower/barrier removal, reduction of maintenance and repair disturbance, and aesthetics.

The combined undergrounding alternative would also provide a meaningful accomplishment towards the redevelopment objectives of the Project Area neighborhoods of Linda Vista, Bayshore and Midway Village. Assuming redevelopment and habitat objectives (as well as existing transmission line improvements) are to be accomplished with the existing overhead lines at some point, the opportunity to underground the existing lines with the least disruption, cost and permitting restraints is with the Jefferson-Martin Project.

Finally, there would be an offsetting reduction of approximately 1.5 miles of additional undergrounding along the remainder of Guadalupe Canyon Pkwy and Old Bayshore Highway. The City understands that Old Bayshore may be nearing its capacity to accept further infrastructure without relocating existing facilities.

The City respectfully requests consideration of this alternative within the environmental impact report, and maintains that this alternative is consistent with public convenience and necessity under Public Utilities Code §§1001-1002.

Respectfully submitted,



Stan Gustavson
City Attorney

cc: City Manager
Director of ECD
Director of Public Works