



COMMITTEE FOR  
GREEN FOOTHILLS

February 27, 2003

By FAX and US Mail

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

**Re: Notice of Preparation: Jefferson-Martin 230 kV Transmission Line Project  
Proposed by Pacific Gas and Electric Company, Application No. A-02-09-043**

Dear Ms. Blanchard,

On behalf of the 1,300 families who are members of the Committee for Green Foothills, I am writing to support the full evaluation in the EIR/EIS of Alternative 1B (Undergrounding of the southern 14.7 mile segment through the Peninsula Watershed Lands) of the above-referenced project.

**The Peninsula Watershed Lands have High Scenic and Resource Values.**

As we have stated at the Public Scoping Hearings, the Peninsula Watershed Lands are recognized locally, nationally, and internationally for their extraordinary scenic quality and natural resource values. In 1969, the City and County of San Francisco entered into what is commonly known as the "Four Party Agreement" which placed a Scenic Easement on 19,000 of the watershed's 23,000 acres, and a Scenic and Recreation Easement on the remaining 4,000 acres. The easements were the result of a negotiated settlement of the dispute as to the route of I-280 through the watershed. The easements require that the watershed lands be kept in their natural state, and allow limited public recreational use consistent with the primary purpose of protection of the public water supply and the natural resources of the watershed. Restrictions on development are administered by the Secretary of the Interior through the National Park Service (Golden Gate National Recreation Area).

The Peninsula Watershed Lands have also been included in the Golden Gate Biosphere Reserve, a designation by the United Nations that recognizes land and water areas of extraordinary natural significance throughout the world. Indeed, visitors from around the world are amazed at this marvelous and stunningly beautiful resource adjacent to the Bay Area's highly developed urban area.

The PG&E 230 kV Transmission Line Project proposes to underground the northern 12.4

mile segment through the urbanized areas from San Bruno to the Martin Substation in Brisbane.

It is surprising to us that the southern 14.7 mile segment that traverses the S.F. natural and undeveloped watershed lands, as well as Edgewood County Park, is proposed to be constructed overhead. This overhead rebuilt segment of the project would require the replacement of the 100 towers that are currently 80 to 100 feet high with new higher towers, between 100 and 150 feet high. Additionally, the existing 50 foot wide right of way would be expanded to 100 feet.

**The Project should avoid Impacts to Scenic Resources.**

Due to the increase in height of the towers and wider right of way required, there will be potentially significant adverse impacts to the celebrated visual resources of the watershed.

Complete avoidance of these adverse impacts could be accomplished by undergrounding the entire 14.7 mile southern segment of the new transmission lines under Canada Road and Skyline Boulevard. It may be possible to modify this undergrounding alternative, based on a more precise analysis of the visual impacts of each of the 100 existing towers and proposed larger towers along the route, as viewed from I-280 and other scenic roads, including Skyline Boulevard both north and south of Highway 92. This study should be used to determine whether some towers and transmission lines are not visible due to topography and/or tree cover.

In addition to evaluation of the complete undergrounding alternative for the new 230 kV lines, we request that consideration be given to undergrounding at least a portion of the existing 60kV transmission lines as mitigation for constructing a portion of the proposed new lines above ground.

**Impacts to Environmentally Sensitive Areas should be Avoided.**

Within the physical broader confines of the Crystal Springs watershed, there are areas of high environmental sensitivity and importance. Along the route of the existing 60 kV transmission lines, Edgewood County Park and Natural Preserve's serpentine grasslands provide habitat for several federal and state protected species. San Mateo County, owner of the Park and Preserve, has entered into a permanent open space easement with the Midpeninsula Regional Open Space District to protect these serpentine grasslands from development. There is also a narrow strip of land along the east side of the right of way for Highway 280, adjacent to Edgewood County Park and Preserve that is owned by the City and County of San Francisco. This strip of land is subject to the same Federal Easements as the other 23,000 acres referenced above.

Recent studies (Stuart Weiss, Stanford Center for Conservation Biology) have shown that some of the most important habitat for serpentine dependent species, particularly the Bay Checkerspot Butterfly, the Edgewood Blind Harvestman and the Edgewood Park

Microblind Harvestman, is located directly below and adjacent to the existing PG&E towers which are located within Edgewood Park and Natural Preserve. Any disturbance of these critical habitat areas could result in a take of these protected species.

While PG&E states that all construction within this sensitive area could be done by helicopter, we do not believe all impacts can be completely avoided. For example, excavating and pouring new concrete foundations would necessarily involve disturbance of the areas around the existing towers -- the very areas where the butterfly and arachnids have robust populations.

To avoid impacts, now and in the future, from construction and maintenance activities within Edgewood Park and Preserve, the existing 60 kV lines in this section should be undergrounded from the Edgewood Substation to at least the Milepost 2 area, under Canaca Road, along with the new lines in this portion of the route. The existing lattice towers should be removed by helicopter, and their foundations left in place in order to avoid disturbance to the serpentine grasslands. This restoration could potentially offset impacts to watershed resources elsewhere.

The second area of priority for avoiding disturbance to the open serpentine grasslands would be the segment generally between Mileposts 4 and 7. Undergrounding of the new 230 kV lines in this area would also reduce exposure for residents of the Highlands area to electro-magnetic fields (EMFs). We do not have enough information as to whether federally and/or state protected species are located within the existing or proposed right of way along this segment. If listed species are found, the new lines should be located under Canada Road, and Skyline Boulevard in this area, taking into account the most reasonable above/underground configuration at the crossing of San Mateo Creek. (We note that since there was not a master map showing the various substations, tap lines, and distribution lines for the 60kV lines as part of the Environmental Assessment. It is difficult to fully assess the engineering details for combinations of above/underground scenarios. We suggest that where tap lines or distribution lines exist, there could be a transition from underground to above ground in order to avoid excavating within the watershed lands to provide service to these facilities.)

The third area of priority for avoiding disturbance to open (nonserpentine) grasslands is adjacent to the residential areas of Hillsborough and Burlingame, which would benefit residents along this route as well as watershed visual qualities.

#### **Impacts to Avian Species should be avoided.**

We note that the Environmental Assessment recognizes that avian species are adversely affected by towers and transmission lines. In foggy conditions which are prevalent in the watershed, birds can have fatal collisions with towers and transmission lines. Undergrounding of both the existing and proposed lines would greatly reduce this adverse environmental impact.

**There is Greater Security from Undergrounding.**

An important benefit from undergrounding all or part of the existing and proposed transmission lines would be reducing the risk of vandalism or terrorism. This important increase in security could potentially offset the greater initial costs of undergrounding.

**The Environmental Document should comply with NEPA as well as CEQA.**

Because of the federal easements administered by the National Park Service, and the need for expanded easements for the proposed new towers and transmission lines, an Environmental Impact Statement (EIS) should be prepared in addition to the EIR.

Thank you for consideration of our comments. We request that we be provided with a copy of the Draft EIR/EIS when it is available. It can be sent to me at the address below. If you have any questions regarding our comments, please feel free to contact me.

Sincerely,



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