

Comment Set B



Larry Franzella
Mayor

CITY OF SAN BRUNO
MAYOR

August 14, 2003

Billie Blanchard, CPUC
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, Ca 94104

RE: Draft Environmental Impact Report for the Proposed Jefferson-Martin 230kV Transmission Line Project (Application No. A0209043) (SCH #20030120066)

Dear Ms. Blanchard:

On behalf of the City Council of San Bruno and the Board of the San Bruno Redevelopment Agency, I am submitting the following comments regarding the draft environmental impact report (DEIR) and I thank you for the opportunity to participate in this process.

Foremost, we appreciate that the DEIR reflects that the California Public Utilities Commission (CPUC) seriously considered the City's overwhelming opposition to the project's proposed transition station at San Bruno Avenue and Glenview Drive. The DEIR includes and fully analyzes most of the alternatives that the City proposed in its scoping comments. As you know from my March 25, 2003 letter, eliminating the transition station at that site is and will continue to be the City's primary focus.

THE CITY OF SAN BRUNO & THE SAN BRUNO REDEVELOPMENT AGENCY FULLY SUPPORT THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE.

The DEIR focused on two alternatives to the southern (overhead) segment of PG&E's proposed project, five alternatives to the northern (underground) segment, and two alternative transition station sites. The DEIR concludes that the "Environmentally Superior Alternative" is Option 1B in the southern area and the Modified Existing Underground 230kV alternative in the northern area.

Option 1B is an all-underground route that would be installed in paved roads. The report indicates that this alternative is, "feasible, meets all project objectives, and has the potential to reduce or avoid significant environmental impacts to visual, recreational, and biological resources and to reduce seismic risk and EMF near residences." (ES-10)

The Modified Existing Underground 230kV alternative is also an all-underground route that uses a portion of an existing PG&E transmission line, but follows a new route in order to avoid congested utility areas. The report indicates that this alternative is feasible, meets project objectives, and also offers a reduction in impacts. (ES-18 & 55-56)

567 El Camino Real, San Bruno, CA 94066-4299
Voice: (650) 616-7060 • Fax: (650) 742-6515
<http://ci.sanbruno.ca.us>

P:\Attorney\Files\Litigation\PG&E ltr draft EIR.doc

B-1

Comment Set B, cont.

Ms. Billie Blanchard, CPUC

August 14, 2003

Page 2 of 4

RE: Draft Environmental Impact Report for the Proposed Jefferson-Martin 230kV Transmission Line Project (Application No. A0209043) (SCH #20030120066)

I am pleased to state that the City of San Bruno supports the Project as defined by the Environmentally Superior Alternative identified in the DEIR and considers it compliant with the requirements of the California Environmental Quality Act ("CEQA"). The City's position would likely change, however, if the Project were revised, so please continue to keep the City informed of any alterations to the Project. Additionally, San Bruno's support comes with the following caveat.

B-1

A significant concern exists with respect to the northern portion of the project. The DEIR contains a number of maps and written descriptions purporting to describe this phase of the project. But there are significant discrepancies between Figure ES-3, Figure ES-2B and the written description on ES-18.

B-2

For example, Figure ES-3 (the Environmentally Superior Alternative) shows the northern portion going from Trousdale and El Camino, along El Camino to Sneath Lane and then out to Shaw Road. We generally support that alignment, but need some additional information. However, Figure ES-2B, which describes the alternates for the northern portion of the Project, shows an incomplete or different route from ES-3. ES-2B apparently shows the route proceeding from El Camino Real east along San Bruno Avenue's already constricted roadway. The written description in the summary (ES-18) also describes several routes without evaluating which ones are realistic and reasonable.

In addition to questions regarding which route is being proposed, there are some technical issues that remain unresolved. For instance, San Bruno is particularly concerned about using San Bruno Avenue as a transmission line route due to its narrow construction. In addition, there may be technical difficulties associated with crossing the BART right-of-way and the proposed Caltrain grade separation project. These issues do not appear to be fully explored in the DEIR.

Thus, before embracing this aspect of the project, the route of the northern section of the Environmentally Superior Alternative must be clarified and the impacts on the area addressed. To the extent that you believe that the DEIR already addresses a specifically proposed route and associated environmental impacts, it should be clarified to indicate where that information could be found within the document.¹

SAN BRUNO SUPPORTS THE PARTIAL UNDERGROUND ALTERNATIVE PROVIDED A TRANSITION STATION IS LOCATED AT AN ACCEPTABLE SITE.

B-3

A partial underground project is described as a second alternative for the southern portion of the original project. This alternative has a combination of overhead and underground segments. The DEIR found that this alternative was less desirable because it presents numerous problems that cannot be fully resolved, including likelihood to cause permanent land use conflicts and greater permanent visual impacts. (ES-54) Therefore, San Bruno believes that Option 1B is the superior alternative. Nonetheless, San Bruno is supportive of Burlingame's preference for the partial underground alternative *provided* a transition station is located at a site acceptable to San Bruno.

From San Bruno's standpoint, the greatest concern is that the partial underground alternative retains the single most offensive aspect of PG&E's Proposed Project -- a transition station at San Bruno Avenue and Glenview Drive. (D.3-160) That would bring us back to square one! For San Bruno, the partial underground alternative with San Bruno Avenue and Skyline Drive transition station at best is a

¹ San Bruno's Public Works Department will provide additional comments and questions in separately submitted comments that are intended to supplement this response.

Comment Set B, cont.

Ms. Billie Blanchard, CPUC

August 14, 2003

Page 3 of 4

RE: Draft Environmental Impact Report for the Proposed Jefferson-Martin 230kV Transmission Line Project (Application No. A0209043) (SCH #20030120066)

Pyrrhic victory, *i.e.*, a success that is not a success because the damage - a transition station at the wrong location- outweighs the good achieved by the project.

As you know, a transition station at San Bruno Avenue and Glenview Drive is completely unacceptable to the City of San Bruno and the San Bruno Redevelopment Agency because of the significant impacts associated with PG&E's proposed transition station. Significantly, the DEIR finds that those impacts *cannot* be mitigated to a less than significant level. (D.3-162)

As accurately described in the DEIR, the City's concerns regarding the Proposed Transition Station include its location in "Area B" of the City's Redevelopment Plan Area, its incompatibility with adjacent residential developments currently being planned, and the resulting elimination of an open parking structure on the same site that is planned, in part, to serve the public trail on the west side of Skyline Boulevard.

The purpose of redevelopment is the elimination of blight—a purpose that justifies a redevelopment agency's powers to restrict the use of property in a redevelopment area and to impose strict design controls, among others. (See *Redevelopment Agency v. Hayes* (1954) 122 Cal.App.2d 777.) By eliminating blight, a redevelopment agency is effectuating the state's policy favoring revitalization of the area. (See *Redevelopment Agency v. City of Berkeley* (1978) 80 Cal.App.3d 158, 168.) State law defines blight as including physical and economic conditions that cause under-use of the redevelopment area, resulting in serious physical and economic burdens on the community. (See California Public Health and Safety Code §§ 33030 *et seq.*)

As noted in the DEIR, the San Bruno Redevelopment Agency has been successful in its efforts in other parts of San Bruno, and its efforts in Area B are beginning to achieve the level of business commitment to the area that is necessary for a successful redevelopment project. The introduction of the Proposed Transition Station would not only be an incompatible land use with the planned adjacent residential development, it could, based on the City's experience, discourage the developers of those projects from completing them. The result would be to delay indefinitely progress in eliminating blight in Area B, in conflict with the policy of the state.

For those reasons, as well as others cited in the DEIR, the City agrees with the DEIR's conclusion that the Proposed Transition Station would constitute a significant land use impact and would result in significant visual and geological impacts that cannot be mitigated to a less than significant level. Route Option 1B avoids those significant impacts without necessarily introducing new impacts. The partial underground alternative does not mitigate the impacts to San Bruno if there is a transition station.² (ES-54)

IF THE PARTIAL UNDERGROUND ALTERNATIVE IS ADOPTED, THE TRANSITION STATION SHOULD BE LOCATED WEST OF SKYLINE AND PREFERABLY AT THE EXISTING SNEATH LANE SUBSTATION.

Although the City of San Bruno and the San Bruno Redevelopment Agency completely oppose a transition station, we know that we must consider our options in the event that Option1B is not adopted. In the event that a transition station remains or becomes part of the project, it should be located west of

² San Bruno's Community Development Department will supplement this letter with separately submitted additional comments regarding mitigation measures relating to a transition station.

B-3

B-4

Comment Set B, cont.

Ms. Billie Blanchard, CPUC August 14, 2003 Page 4 of 4
RE: Draft Environmental Impact Report for the Proposed Jefferson-Martin 230kV Transmission Line
Project (Application No. A0209043) (SCH #20030120066)

Skyline in order to minimize impacts to the extent possible, as discussed in the City's scoping comments.

Preferably, a transition station would be co-located with the existing PG&E station at Sneath Lane. As found by the DEIR, a Sneath Lane Transition Station is preferable to the original or alternate locations because a station at Sneath is compatible with adjacent land uses. (ES-55) The site is already industrial. Among possible transition station locations, Sneath Lane also presents the least visual impact and does not affect recreational facilities. (ES-55)

CONCLUSION

The City again thanks you for the opportunity to comment on the DEIR and appreciates the extent to which its scoping comments and suggested alternatives were incorporated into and analyzed in the DEIR. The City supports the 1B Option and looks forward to receiving clarification regarding the northern portion of the underground project. If however, the Project changes in the future, the City will have to reconsider its support as well as its conclusion that the DEIR complies with CEQA's requirements. Please continue to keep the City informed if the Project is changed in the future to deviate from the Environmentally Superior Alternative.

Very truly yours,



LARRY FRANZELLA
Mayor

cc: Charlotte TerKeurst, Administrative Law Judge
Loretta M. Lynch, Commissioner
Harriet Burt, CPUC
Travis Kiyota, PG&E
San Bruno City Council
San Bruno Redevelopment Agency Board
Frank Hedley, City Manager
Scott Munns, Public Works Director
George Foscardo, Community Development Director

B-4

Comment Set B, cont.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF SERVICE

I am a citizen of the United States and employed in the County of San Mateo; my business address is 567 El Camino Real, San Bruno, California. I am over the age of 18 years and not a party to the foregoing action.

On August 15, 2003, I caused to be served the following document(s):

MAYOR FRANZELLA'S AUGUST 14, 2003, LETTER REGARDING DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PROPOSED JEFFERSON-MARTIN 230kV TRANSMISSION LINE PROJECT (APPLICATION NO. A0209043) (SCH #20030120066)

On the parties in this action, by placing a true copy thereof in a sealed envelope(s), each envelope addressed as follows:

SEE ATTACHED SERVICE LIST

- (By First Class Mail)** I caused each such envelope, with postage thereon fully prepaid, to be placed in the United States mail to be mailed by First Class mail at San Bruno, California.
- (By Hand)** I caused each such envelope to be hand delivered to the addressee above.
- (By California Overnight)** I caused each such envelope to be sent by California Overnight to the offices of each addressee above.
- (By facsimile transmission)** I caused each such document(s) to be sent via facsimile in accordance with Code of Civil Procedure § 1013(e) § 1005, to the above party(ies) at the facsimile number(s) indicated.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on August 15, 2003, at San Bruno, California.



VIOLA WEBER

PROOF OF SERVICE

Comment Set B, cont.

1 SCOTT LOGAN
2 CALIF PUBLIC UTILITIES COMMISSION
3 ELECTRICITY RESOURCES AND PRICING BRANCH
4 ROOM 4209
5 505 VAN NESS AVENUE
6 SAN FRANCISCO, CA 94102-3214

7 SCOTT TANAMUGSUKBOVON
8 CALIF PUBLIC UTILITIES COMMISSION
9 ADMINISTRATIVE BRANCH
10 AREA
11 505 VAN NESS AVENUE
12 SAN FRANCISCO, CA 94102-3214

13 SUSAN LEE
14 ASPEN ENVIRONMENTAL GROUP
15 235 MONTGOMERY STREET, SUITE 800
16 SAN FRANCISCO, CA 94104

17
18
19
20
21
22
23
24
25
26
27
28

MARTHA DEBRY
TOWN OF HILLSBOROUGH
1600 FLORIBUNDA AVENUE
HILLSBOROUGH, CA 94010

MARY K. RAFTERY
ATTORNEY AT LAW
COUNTY OF SAN MATEO
OFFICE OF THE COUNTY COUNSEL
400 COUNTY CENTER
REDWOOD CITY, CA 94063

JAMES E. SCARFF
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5121
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSEPH P. COMO
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
CITY HALL, ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO, CA 94102-4682

RICHARD W. RAUSHENBUSH
ATTORNEY AT LAW
LATHAM & WATKINS
505 MONTGOMERY STREET, SUITE 1900
SAN FRANCISCO, CA 94111

Comment Set B, cont.

- 1 EDWARD W. O'NEILL
ATTORNEY AT LAW
- 2 DAVIS WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, SUITE 600
- 3 SAN FRANCISCO, CA 94111-3834

- 4 DAVID KRASKA
ATTORNEY AT LAW
- 5 PACIFIC GAS & ELECTRIC COMPANY
PO BOX 7442
- 6 SAN FRANCISCO, CA 94120

- 7 JOSEPH M. KARP
ATTORNEY AT LAW
- 8 WHITE & CASE LLP
THREE EMBARCADERO CENTER, SUITE 2210
- 9 SAN FRANCISCO, CA 94941

- 10 JEANNE M. SOLE
REGULATORY COUNSEL
- 11 CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
- 12 FOLSOM, CA 95630

- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Comment Set B, cont.



George D. Foscardo, AICP
Community Development Director

CITY OF SAN BRUNO
COMMUNITY DEVELOPMENT DEPARTMENT

August 28, 2003

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

**RE: COMMENTS ON DRAFT EIR FOR THE PROPOSED JEFFERSON-MARTIN
230 Kv TRANSMISSION LINE PROJECT – SCH #20030120066**

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Jefferson Martin 230 kV transmission line project. A portion of the project runs through the City of San Bruno, with a significant transition station being considered for location at one of the key gateways to our city. The following comments relate to the project components which have the potential to impact San Bruno residents, our public facilities, and the future development of key areas of our city. These comments augment previous comments submitted by the City of San Bruno, including those contained in the August 14, 2003 letter from Mayor Franzella. Additional comments will also be submitted from the San Bruno Director of Public Works, Scott Munns.

**As stated in the August 14, 2003 letter from San Bruno Mayor, Larry Franzella:
The City of San Bruno and the San Bruno Redevelopment Agency Fully Support
the Environmentally Superior Alternative.**

First and foremost, the City of San Bruno's position concerning the location of a PG&E transition station on the CalTrans property located at the northwest corner of San Bruno Avenue and Glenview Drive remains unchanged. San Bruno and its residents strongly and vigorously oppose the construction of any transition station at one of the major gateways to our City, specifically at San Bruno Avenue and Glenview Drive. The City Council and neighbors are united and unwavering on this position.

Second, the City has offered several constructive suggestions and alternatives to the locating of the transition station at this location, including placing the transition station, if required, adjacent to the existing PG&E substation on the west side of Skyline Boulevard, just north of San Bruno Avenue.

B-5

567 El Camino Real, San Bruno, CA 94066-4299
Voice: (650) 616-7074 • Fax: (650) 873-6749
<http://ci.sanbruno.ca.us>

Comment Set B, cont.

Billie Blanchard, CPUC
Comments on Draft EIR for the Proposed Jefferson-Martin 230 kV Transmission Line Project
August 28, 2003
Page 2 of 4

Third, in the unanticipated and unchallenged event that the PUC judge decides upon a position other than that stated above by the City of San Bruno and its residents, the following guidance is provided for locating transition facilities in San Bruno, including CEQA considerations:

Transition Station versus Transition Pole (Tower)

1. The City of San Bruno would prefer a transition monopole, or transition tower, as shown on the attached photograph provided by PG&E, rather than the transition station, as shown on the attached photograph also provided by PG&E.
2. The City of San Bruno suggests that such a transition monopole could be located at other locations along the proposed route, including north near Sneath Lane, or south across from the City's water tank, but north of the John Muir School.

The location across from the water tank could accommodate the placement of a transition pole on the west side of Skyline Boulevard and may also be located at that point east of the San Andreas Fault, allowing an underground transition to Glenview Drive (at the water tank) and then north to San Bruno Avenue via Glenview. The City acknowledges that it could also require two transition monopoles and requests consideration that any such monopole located between Glenview Drive and Skyline Boulevard be located in such a manner as to allow for the potential widening of Skyline Boulevard to four lanes (two lanes in each direction). These suggestions are based on Figure 10-1 of the "Proponent's Environmental Assessment" dated September 2002, Volume 1 of 2, prepared by CH2MHILL for PG&E, and also Plate 1 of the "Geologic Hazard Evaluations for Gas Transmission Lines 109 and 132 in San Bruno, dated November 1, 1992 and prepared by Geosciences Department for PG&E.

Site Requirements of Transition Station (if required at San Bruno Ave. and Glenview Drive)

3. As a gateway entrance to City, and with new residential development currently proposed for the northeast corner of San Bruno Avenue and Glenview Drive, as well as for the southeast corner of San Bruno Avenue and Glenview Drive, the City remains avidly against locating a transition station at the northwest corner of this intersection. The proposed location of the transition station is located in our Redevelopment Area "B", with these new developments finally taking shape. A transition station at Glenview Drive and San Bruno Avenue would impede the planned and orderly development of the area, reduce property values, and add more blight to the redevelopment area instead of reducing it. The subject CalTrans site also contains earthquake faults and numerous trace faults, as mapped previously by PG&E, raising concerns of safety for the adjacent neighborhood.

However, in the event that a transition station could conceivably be located at the northwest corner of San Bruno Avenue and Glenview Drive, over the objections of the City of San Bruno, the following siting requirements are offered by the City:

B-6

B-7

Comment Set B, cont.

Billie Blanchard, CPUC
Comments on Draft EIR for the Proposed Jefferson-Martin 230 kV Transmission Line Project
August 28, 2003
Page 3 of 4

- a. Allow for the future widening of Skyline Boulevard (between Sneath Lane and San Bruno Avenue and then beyond to I-280) to accommodate four (4) lanes of traffic, including left-turn lanes at San Bruno Avenue. This can only be accommodated on the east side of Skyline Boulevard due to the protected environmental reserve area on the west side. With highway shoulders, bike lanes, and landscaping, there should be a minimum setback from the existing Skyline Boulevard of fifty (50) feet to accommodate these plans. Figure 2-14 in the "Proponent's Environmental Assessment, dated September 2002, and prepared by CH2MHILL, appears to adequately address this setback.
- b. Allow for the 112-car parking lot currently proposed by the Church of the Highlands under an existing lease on the subject site with CalTrans. This parking lot would also be used by San Mateo County Parks as a lot for the trailhead on the west side of Skyline Boulevard. The proposed parking lot, as currently designed, measures approximately 150 feet (north-to-south) by 275 feet (east-to-west). The proposed transition station conflicts with the current layout of the 112-car parking lot. Either the parking lot would have to be re-designed or the transition station re-located to the north – or a combination thereof.
- c. Any development of the site must accommodate a public sidewalk, with handicapped access, along the San Bruno Avenue and Glenview Drive frontages. Safe and well-defined pedestrian/bicycle access from the corner of San Bruno Avenue at Skyline Drive across Skyline to the County trail system is critical.
- d. Any development of the site should accommodate a location for a "gateway" sign as the entrance to the City of San Bruno. Such a gateway sign should be located near the southwest corner of the site, near San Bruno Avenue at Skyline Boulevard, allowing for future setbacks stated above.
- e. If a transition station were to be located on the site, all landscaping must be wind tolerant to accommodate the local climate conditions.
- f. Any transition station should be screened by landscaping, walls, or a combination thereof, to mitigate adverse visual impacts.
- g. Any transition station should provide anti-graffiti coating, security provisions, and safety lighting. Barbed wire or razor wire must be prohibited.
- h. Development of the remainder of the CalTrans property is critical. The current proposal under consideration by the City's General Plan Update Committee is to designate the site as "Open Space" due to the proliferation of earthquake faults and splinter faults. This area should be graded and planted to accommodate the designation of the entire site for Open Space purposes.

B-7

Undergrounding Issues in San Bruno

- 4. One of the critical issues concerning the undergrounding of the utility lines through San Bruno involves the potential route through the general intersection of San Bruno Avenue and Huntington Avenue at the CalTrain tracks, as well as the BART underground tracks. This intersection is the subject of a proposal for a grade separation project for CalTrain, with the CalTrain station in San Bruno to be located over San Bruno Avenue. This major project will entail the lowering of the streets and the elevation of the CalTrain tracks. BART is also located underground, including under a major portion of Huntington Avenue. With other utilities located under Huntington Avenue, the City suggests that

B-8

Comment Set B, cont.

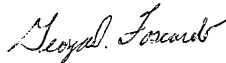
Billie Blanchard, CPUC
Comments on Draft EIR for the Proposed Jefferson-Martin 230 kV Transmission Line Project
August 28, 2003
Page 4 of 4

any undergrounding continue north to Sneath Lane, then turn east to Huntington Avenue, to avoid this major public works improvement. If this alternate route is not feasible, San Bruno will cooperate to find acceptable alternative routes to avoid the impacts and difficulties at the San Bruno Avenue/San Mateo Avenue/Huntington intersection with BART and CalTrain.

B-8

Once again, thank you for the opportunity to address these critical issues. The City appreciates your cooperation and looks forward to a solution which accommodates the needs and concerns of all parties involved in this process.

Yours truly,



George D. Foscardo, AICP
Community Development Director
City of San Bruno

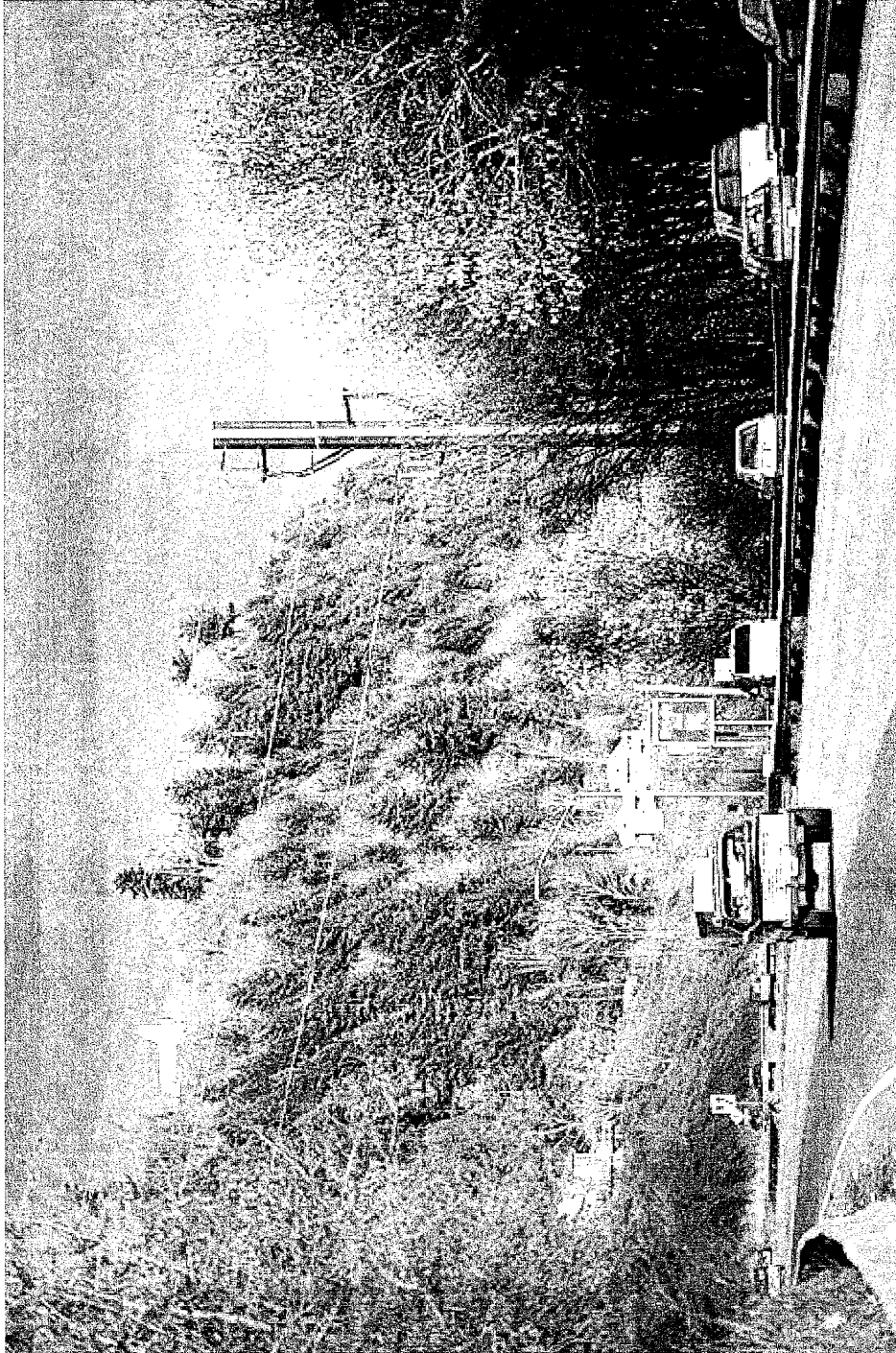
Distribution List:

Honorable Mayor and City Council, City of San Bruno
Honorable Chair and Members, San Bruno Redevelopment Agency
Frank Hedley, City Manager (Retiring)
Connie Jackson, City Manager (Beginning September 15, 2003)
Steve Rogers, Assistant City Manager
Pamela Thompson, City Attorney
Scott Munns, Public Works Director
Honorable Mayor Michael Coffey, City of Burlingame

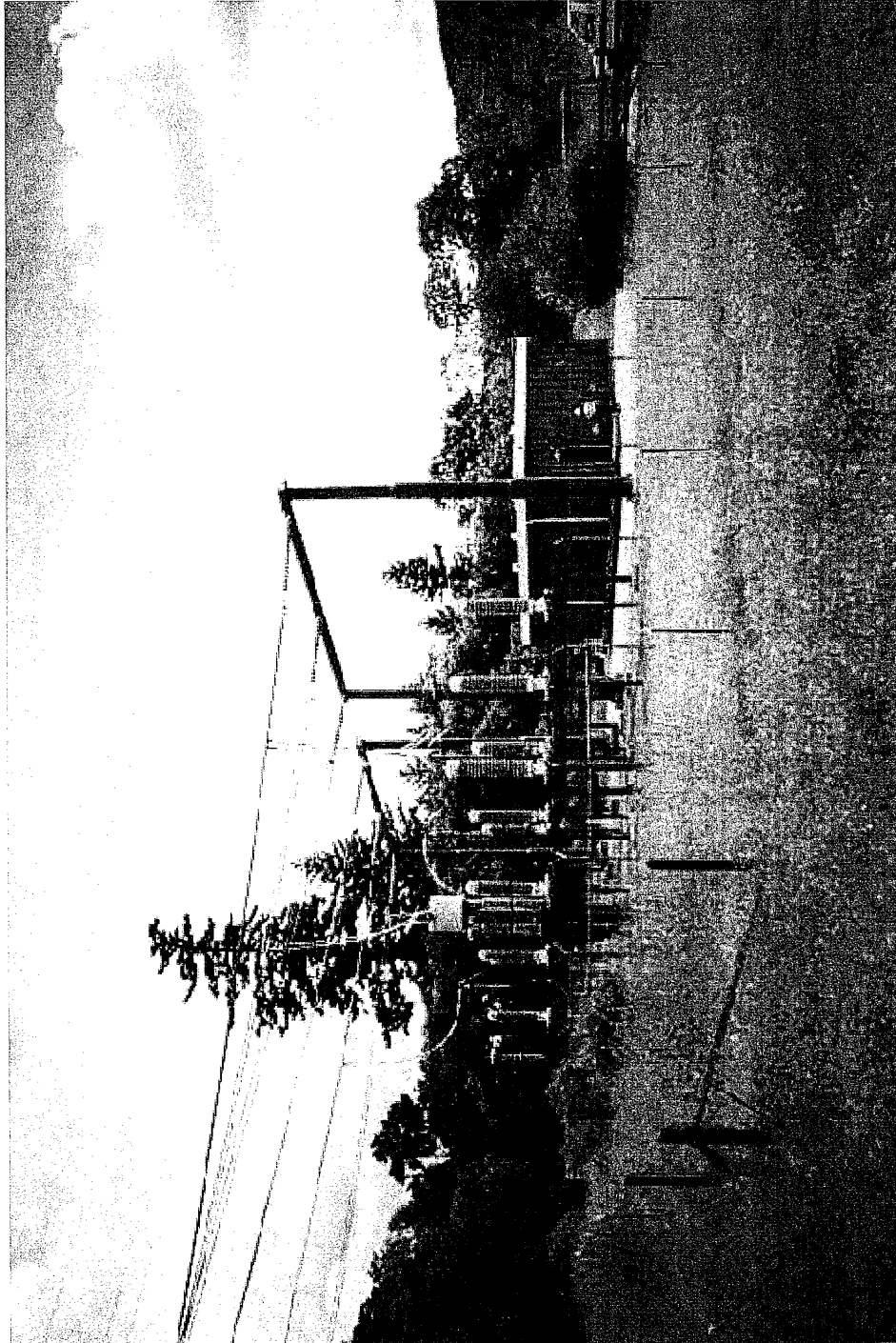
Attachments:

1. Picture of a Transition Monopole, supplied by PG&E
2. Picture of a Transition Station, supplied by PG&E
3. Copy of Figure 10-1 of the "Proponent's Environmental Assessment" dated September 2002, Volume 1 of 2, prepared by CH2MHILL for PG&E.
4. Copy of Plate 1 of the "Geologic Hazard Evaluations for Gas Transmission Lines 109 and 132 in San Bruno, dated November 1, 1992 and prepared by Geosciences Department for PG&E.

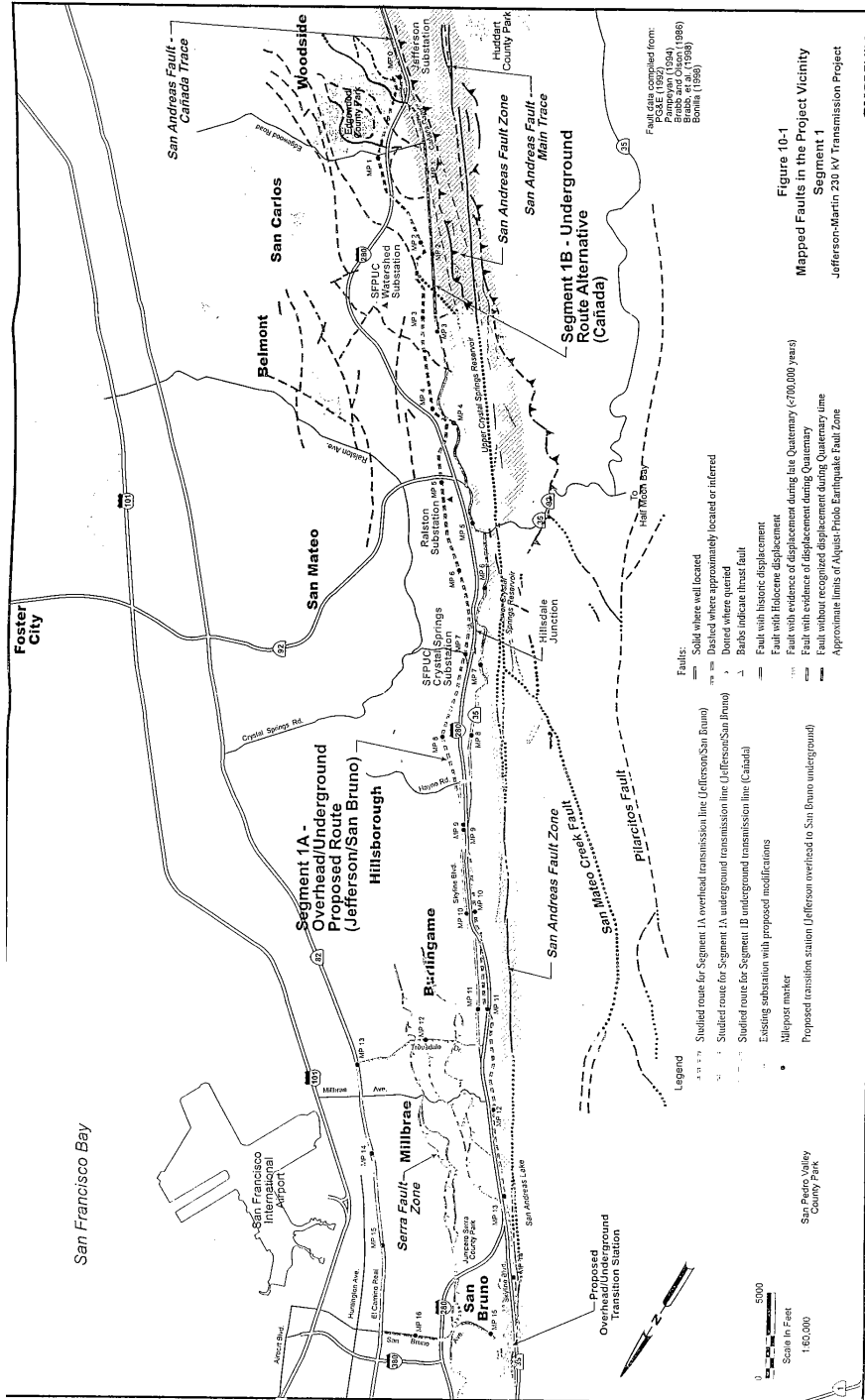
Comment Set B, cont.



Comment Set B, cont.



Comment Set B, cont.



Comment Set B, cont.



Scott Munns
Public Works Director

CITY OF SAN BRUNO
PUBLIC WORKS - ADMINISTRATION

PWD-2003-036

August 28, 2003

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

RE: Draft Environmental Impact Report for the Proposed Jefferson-Martin 230kV
Transmission Line Project (Application No. A0209043) (SCH #20030120066)

Dear Ms. Blanchard:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Jefferson Martin 230 kV transmission line project. A portion of the project runs through the City of San Bruno. The following comments relate to the project components which have the potential to impact San Bruno residents and/or our public facilities. These comments augment previous comments submitted by the City of San Bruno, including those contained in the August 14, 2003 letter from Mayor Franzella, and an August 28, 2003 letter submitted by San Bruno Director of Community Development George Foscardo.

The DEIR focused on two alternatives to the southern (overhead) segment of PG&E's proposed project, five alternatives to the northern (underground) segment, and two alternative transition station sites. The DEIR concludes that the "Environmentally Superior Alternative" is Option 1B in the southern area and the Modified Underground Existing 230kV Co-Location Alternative in the northern area. As stated in the August 14, 2003 letter from San Bruno Mayor Larry Franzella, the City of San Bruno and the San Bruno Redevelopment Agency fully support the Environmentally Superior Alternative.

I would like to take this opportunity to note some concerns with respect to the northern portion of the project. The DEIR contains a number of maps and written descriptions purporting to describe this phase of the project. There are significant discrepancies between Figure ES-3, Figure ES-2B and the written description on ES-18.

For example, Figure ES-3 (the Environmentally Superior Alternative) shows the northern portion going from Trousdale and El Camino, along El Camino to Sneath Lane and then out to Shaw Road. The City of San Bruno could likely support that alignment, but it was not studied in the DEIR. This actually appears to be a mapping error. Figure ES-3 should be corrected to match the written description of the Modified Underground Existing 230kV Co-

B-9

567 El Camino Real, San Bruno, CA 94066-4299
Voice: (650) 616-7065 • Fax: (650) 794-1443
<http://ci.sanbruno.ca.us>

Comment Set B, cont.

Billie Blanchard, CPUC
Re Draft EIR for the Proposed Jefferson-Martin 230kV Transmission Line Project
(Application No. A0209043) (SCH #20030120066)
August 28, 2003
Page 2 of 2

Location Alternative, and turn east onto San Bruno Avenue at the El Camino Real/San Bruno Avenue intersection.

B-9

The DEIR also mentions the proposed Caltrain Grade Separation at San Bruno Avenue in the discussions of the alternatives. The report tends to indicate that getting past the proposed Grade Separation is something that can be resolved during final design. While I generally agree with that statement, it should be noted that the proposed Grade Separation will reduce the cover over the BART subway box within the San Bruno Avenue alignment to the minimum vertical clearance that the BART structure will withstand, leaving very little vertical clearance for the PG&E 230 kV line. Additionally, the soil mix platform that will be constructed to support the embankment will also make the Caltrain corridor very difficult to cross outside of the roadway alignment.

B-10

It is also extremely early in the process to discuss specific construction impacts on the community prior to the final route selection. However, on behalf of the City, I would like to go on record with the expectation that PG&E consider options for minimizing disruption to the community. Since this project is substantially larger the normal utility projects, project control measures should be incorporated as necessary to minimize impact on the City's residents and businesses. Examples of project control measures include detailed plan review, permitting for work in each segment of roadway, review and acceptance of traffic control and pedestrian access plans, inspection of construction in City streets and rights of way, repair of damages to existing utilities, consideration of working hours including night work and at critical locations, and reimbursements of all City direct costs associated with the construction of the project.

B-11

Thank you again for the opportunity to identify and comment on these issues and concerns.

Very truly yours,



Scott T. Munns, P.E.
Public Works Director

cc: Charlotte TerKeurst, Administrative Law Judge
Honorable Mayor and City Council, City of San Bruno
Honorable Chair and Members, San Bruno Redevelopment Agency
Frank Hedley, City Manager
George Foscardo, Community Development Director