

Comment Set R

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September 12, 2003

Via Facsimile (650) 240-1720 and U.S. Mail

Billie Blanchard
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 94104-2906

*Re: Jefferson-Martin 230 kV Transmission Line Project (Application No. A-02-09-043)
Comments on Draft Environmental Impact Report*

Dear Ms. Blanchard:

County staff typically provides comments on environmental documents on behalf of the County of San Mateo. Since there have been a number of County departments involved in reviewing the Draft Environmental Impact Report (DEIR) for the above-mentioned Project, our office has coordinated the review process and submits the following comments:

Criteria for Evaluating Project Alternatives

In reviewing the information in the DEIR and considering the various alternatives, the County believes that the evaluation of the Project and Alternatives should be based upon the following criteria:

1. **Limiting Potential Impacts on Public Health and Safety**

Highest priority in evaluating the proposed Project and Alternatives should be given to the potential health impacts of proximity to electric and magnetic fields (EMF) from power lines. According to the DEIR, the Project and Alternatives will expose County residents and visitors to new or increased exposures to Electric and Magnetic Fields (EMF) from power lines. Most recently, the California Department of Health Services (DHS) has classified EMF from power lines as a possible carcinogen. The DEIR does not address this issue from a CEQA perspective, but only provides information on the issue, including estimates for increases in EMF levels resulting from the original Proposed Project. There is no information on EMF levels for the Alternatives.

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R-1

Comment Set R, cont.

Billie Blanchard
September 12, 2003
Page 2

According to the DEIR, there remains a lack of consensus among scientists as to the level of health risk posed by EMF from power lines. Given this apparent uncertainty within the scientific community, neither P.G.& E. nor the California Public Utilities Commission (CPUC) can provide definite assurances to County residents that the Proposed Project and Alternatives will *not* create potential health impacts. Until such assurance can be provided, *new* exposures to EMF, caused by locating power lines in a new right-of-way (ROW), should be avoided to the greatest extent possible, especially in the more densely populated areas. If the Project must be placed in a new ROW, decision makers should choose the location that impacts the least number of residences, schools and businesses. Any decision should also avoid or reduce *increased* exposure to EMF along the existing P.G.& E. ROW as much as possible. The County believes that any alternative selected for the Project should be the one that avoids residential areas, schools and recreational areas to the greatest extent possible. Additionally, if potential impacts to occasional users in recreational areas come into conflict with potential impacts to residential areas and schools, the residential/school concerns should prevail.

R-1

The DEIR should also consider health impacts from EMF as a potentially significant impact for purposes of environmental review, rather than treating them as an informational item. Particular attention should be given to what mitigation measures (or alternative selections) would reduce those impacts, particularly in proximity to residential areas and schools. Current CPUC policy requires public utilities to consider low and no-cost mitigations (up to 4% of the project cost). The County recognizes that alternatives and mitigation measures must fit within a rule of reason and that cost factors should be balanced against the need for the Project. Yet, mitigation is necessary here even if it has a substantial cost. The decision should include sufficient specific mitigation measures with an adequate mitigation-monitoring plan that avoids or reduces exposure to EMF. The Administrative Law Judge and CPUC should have this information before making a decision that can affect San Mateo County residents for decades to come.

Finally, the DEIR should provide an analysis of potential EMF impacts for the proposed alternatives analyzed in the document. It is not clear to what degree those alternatives will create greater or new risks of EMF exposures to residential areas and schools. This information should be analyzed and made available to the public before any final decision is made.

2. Limiting Aesthetic and Biological Impacts

Next priority should be given to aesthetic and biological impacts, particularly those associated with any aboveground alternatives in the Southern segment of the Project and the segments near the County's recreational facilities at Edgewood Park, Sawyer Camp Trail and San Bruno Mountain. However, in balancing impacts, potential health risks should prevail over potential aesthetic and biological impacts. If, on balance, impacts must be made to aesthetic and biological impacts in order to protect against potential health impacts, there should be adequate mitigation measures to minimize the aesthetic and biological impacts.

R-2

Comment Set R, cont.

Billie Blanchard
September 12, 2003
Page 3

If an aboveground alternative is chosen for the southern segment, the decision should include specific mitigation to minimize visual and biological impacts. Mitigation should specifically include any required consultation with the federal and state agencies that oversee the protected habitats in County parks and recreational facilities. County representatives should be invited to participate in any informal or formal consultation with these agencies concerning Edgewood Park and San Bruno Mountain.

R-2

3. Ensuring a Balanced Consideration of Alternatives and Mitigations

The County believes that any decision should look at the environmental cost/benefit of the Project or Alternative as a whole, not just isolated segments of the proposal. In selecting an alternative, there is a risk that it may benefit one jurisdiction or group in the County to the detriment of another. While additional mitigations may be beneficial to one neighborhood, there may be effects to other neighborhoods, either directly or indirectly. The mitigation may move the physical impacts to another area, or it may drive costs up to the extent that other constituencies are denied the benefit of seeking mitigation for their concerns. Potential benefits and burdens of the Project should be spread equitably among the community as a whole to the greatest extent possible.

R-3

4. Limiting the Creation of a New Power Line Right-of-Way in Residential Areas

Finally, consideration should be given to the original location of the power lines rather than moving or creating new power line rights-of-way (ROW) through areas which have not previously had them. At the time a resident purchases property, the resident is aware and can choose to accept the existing conditions on or near the property. Although residents adjacent to the existing ROW could not have expected the type of increase now being proposed, they were aware of the ROW and its potential impact on property values at the time they purchased their property. The County would like to see all residential areas protected against an increase in EMF exposures and potential impacts to property values. However, if a choice must be made between putting the new power lines in a residential area adjacent to the existing ROW and creating a new ROW within another residential area, preference should be to keep the ROW in its current location with adequate mitigation to reduce impacts as much as possible.

R-4

Preferred Alternative

Applying these criteria using the information available to date, the County believes that the best alternative for the Southern segment described in the DEIR is the Partial Underground Alternative provided that the Alternative uses the Sneath Lane Transition station and Sneath Lane alternative. At the initiation of Supervisor Mark Church, the Cities of Burlingame, Millbrae and San Bruno have now reached a compromise position supporting the Partial Underground Alternative in their communities with the Sneath Lane Transition station/alternative. Consensus within the communities most impacted by this Project is extremely important in a Project of this nature, and it should be given great weight by the CPUC in making its decision.

R-5

Comment Set R, cont.

Billie Blanchard
September 12, 2003
Page 4

The County would also support a hybrid for the Southern segment, which uses (1) the 1B Alternative south for the portion of the route between the Jefferson Substation in Redwood City and the Carolands Substation in Hillsborough and then (2) the Partial Underground Alternative from the Carolands Substation to the proposed Sneath Lane Transition Station. The County requests that specific mitigation measures be included to minimize visual and biological impacts in the aboveground portions of the route.

R-5

The County is still considering the options for the Northern segment. The County understands that the CPUC has received a number of comments concerning the Preferred Alternative (Modified Existing 230kv Alternative). The County would like the opportunity to review the responses to those comments before it makes a decision.

Further technical comments from the County Parks and Recreation Department are attached.

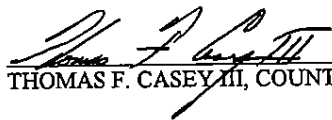
Conclusion

The County of San Mateo appreciates the opportunity to submit comments and participate in this process. We also appreciate your responsiveness to the County's scoping comments and your willingness to answer our questions and share information as the process progresses. In closing, we wish to emphasize that, in making the above comments, the County is not intending to endorse the No Project Alternative, and the comments should not be construed as endorsing that Alternative. The County recognizes the importance of a safe, adequate and reliable energy distribution system to meet the current and future needs of the citizens of the County.

R-6

If you have questions or need information, please feel free to contact my office.

Very truly yours,


THOMAS F. CASEY III, COUNTY COUNSEL

TFC/MKR:gg

cc: Members of the Board of Supervisors
John L. Maltbie, County Manager
Marcia Raines, Director of Environmental Services
Mary Burns, Director of County Parks and Recreation
Terry Burnes, Planning Administrator
Neil Cullen, Director of Public Works
Dean Peterson, Director of Environmental Health
Steve Alms, Real Property Manager

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September 12, 2003

Comment Set R, cont.

TECHNICAL COMMENTS FROM SAN MATEO COUNTY PARKS AND RECREATION DIVISION

The County Parks and Recreation Division ("County Parks") submits the following comments:

1. County Parks should be given the opportunity to review any plan associated with tower replacement or removal in Edgewood Park, particularly to the extent that it may disrupt park use or impact federal and state grant programs. **R-7**
2. The County may be constructing improvements to Sawyer Camp Trail over the next three years. The County therefore requests a condition requiring the coordination and timing of construction activities between P.G.&E.'s Project and County Parks' project to minimize conflict and prevent undue disturbance to park users and neighbors. **R-8**
3. If the Proposed Project for the Northern Segment is adopted, the County requests a mitigation measure requiring consultation with County staff regarding possible HCP amendment. The County also needs clarification whether any staging areas associated with the Project will be on Park lands adjacent to the Guadalupe Parkway. **R-9**

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Comment Set R, cont.

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MARK CHURCH
MEMBER, BOARD OF SUPERVISORS
SAN MATEO COUNTY

September 12, 2003

Via Facsimile (650) 240-1720 and U.S. Mail

Billie Blanchard
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, California 94104-2906

Re: *Jefferson-Martin 230 kV Transmission Line Project (Application No. A-02-09-043)*
Comments on Draft Environmental Impact Report

Dear Ms. Blanchard:

I am an elected Member of the San Mateo County Board of Supervisors, representing District One which extends from San Mateo to South San Francisco. My District will be the most affected by the environmental impacts of the proposed Jefferson-Martin Transmission Line Project, especially the potential health impacts from proximity to electric and magnetic fields (EMF) from power lines. I am writing this letter to emphasize the concerns and the consensus that has been reached by the communities in my District on the possible alternatives described in the Draft Environmental Impact Report (DEIR) for this Project.

I have been working with the communities in my District so that I can best represent their views on the Project's environmental impacts and alternatives. Last week, I met with Mayor Michael Coffey of Burlingame, Mayor Linda Larson of Millbrae and Mayor Larry Franzella of San Bruno to discuss the Project and preferred alternatives. As you know, each of these cities has taken a different position on preferred alternatives based upon the concerns and potential impacts to that individual city. At my request, we met to discuss the regional impacts of the Project, looking at preferred alternatives for these communities as a whole. We were able to reach a compromise position which is outlined in the attached letter. This compromise has been approved by each City Council or is consistent with the city's original position.

R-10

Comment Set R, cont.

Billie Blanchard
September 12, 2003
Page 2

I believe that the compromise alternative described in the Cities' letter is the only alternative that satisfies the concerns of all communities. It avoids placing a new Right-of-Way (ROW) in the densely populated residential and school areas along Trousdale in Burlingame. It alleviates the necessity of adding an additional ROW along the densely populated residential areas along Skyline. The compromise also keeps the route away from the densely populated commercial and residential areas along El Camino Real in Burlingame, Millbrae and San Bruno.

Furthermore, by locating the ROW along Sneath Lane, the route will avoid a more densely populated alternative on San Bruno Avenue or Trousdale Drive. Sneath Lane is much wider than Trousdale, and there are wider sidewalks and setbacks from the street, thereby creating a greater distance and better protections from potential impacts from EMF. Also, unlike Trousdale, there are no residences or schools immediately adjacent to Sneath. Sneath is half the length of Trousdale, and the entire northern side of Sneath abuts a cemetery.

I also strongly urge the California Public Utilities Commission (CPUC) to apply the criteria outlined in the comment letter from the County Counsel for San Mateo County. First, the CPUC should consider the potential health impacts from proximity to EMF in its decision. The alternative selected for this Project should be the one that has the least environmental impact from EMF to residential areas, schools and businesses. The more densely populated areas should be avoided. It should also avoid new exposures to EMF caused by locating power lines in a new right-of-way (ROW). Finally, it should avoid increasing existing impacts in those areas adjacent to the current P.G.&E. ROW as much as possible.

In addition to the EMF issue, the decision should limit aesthetic and biological impacts as much as possible. It should look at the environmental cost/benefit of the Project or Alternatives as a whole, not just the isolated segments of the proposal which may benefit one community to the detriment of another. Finally, although it would be preferable that the Project avoid all residential areas, if a choice must be made between an alternative that puts the lines in a residential area adjacent to the existing ROW or one that creates a new ROW in another residential area, preference should be to keep the line in or near the current ROW with adequate mitigation to move the line away from residences and reduce impacts as much as possible.

I also concur with the County's letter regarding the Northern segment of the Project. We need the opportunity to review the comments and additional information concerning the Environmentally Superior Alternative identified in the DEIR before any position or decision can be made on that segment.

R-10

Comment Set R, cont.

Billie Blanchard
September 12, 2003
Page 3

I appreciate the opportunity to comment on the consensus reached by the communities within my District. I ask that the CPUC take their concerns seriously. This decision is one that can impact San Mateo County for decades to come. The consensus position reached by Burlingame, Millbrae and San Bruno, the communities that will be most affected by the Project in this segment, should be given the greatest consideration by the CPUC.

R-10

Very truly yours,


HONORABLE MARK CHURCH, MEMBER
SAN MATEO COUNTY BOARD OF SUPERVISORS

MC/MKR:gg

Enclosure

cc: Charlotte TerKeurst, Administrative Law Judge (w/enc.)
Members, California Public Utilities Commission (w/enc.)
Members of the Board of Supervisors (w/enc.)
John L. Maltbie, County Manager (w/enc.)
Thomas F. Casey III, County Counsel (w/enc.)
Mayor and Members of Burlingame City Council (w/enc.)
Mayor and Members of Millbrae City Council (w/enc.)
Mayor and Members of San Bruno City Council (w/enc.)
P.G.& E. (w/enc.)

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September 11, 2003

Comment Set R, cont.



September 10, 2003

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

Re: Joint Comments of the Cities of Millbrae, San Bruno, and Burlingame on the Draft Environmental Impact Report for the Jefferson-Martin 230 kV Transmission Line Project (Application No. A-02-09-043)

Dear Ms. Blanchard:

This letter is submitted on behalf of the Cities and City Councils of Burlingame, Millbrae, and San Bruno. Burlingame, Millbrae, and San Bruno represent a population of over 100,000 residents in central San Mateo County.

During the public hearings and in comment letters submitted for the above-mentioned project, each city voiced positions on the preferred alternative for the Jefferson-Martin 230 kV Transmission Line Project.

San Bruno Mayor Larry Franzella testified at an August 14, 2003, public hearing that the City supported the all-underground (1B) alternative in the southern route and the modified existing underground in the northern route, subject to further information. This alternative avoids the City's primary objection to the plan, placement of a transition station at San Bruno Avenue and Glenview Drive. Placement of a transition station at this location is completely unacceptable to San Bruno. A transition station there would negatively impact proposed residential development and create land use conflicts with the City's General Plan and Redevelopment Plan. San Bruno's position is articulated in the City's letters to the CPUC and to PG&E. Mayor Larry Franzella also stated that in an effort to work with its neighbors, the City could support other options that exclude the proposed transition station at Glenview/San Bruno Avenues.

The City of Burlingame supported the Partial Underground Alternative and voiced serious concerns about the all-underground (1B) alternative in its comment letters on the Draft Environmental Impact Report (DEIR). With its comment letters, the City submitted a petition with over 254 signatures expressing concerns related to potential impacts from Electric Magnetic

R-11

Comment Set R, cont.

Billie Blanchard, CPUC c/o Aspen Environmental Group

Re: *Joint Comments of Millbrae, San Bruno, and Burlingame on the Draft EIR for the Jefferson-Martin 230 kV Transmission Line Project*

September 10, 2003

Page 2

Fields (EMF) for neighborhoods in the Skyline, Trousdale, and El Camino Real areas. Mayor Michael Coffey also stated in the City's comment letters that it was the City's understanding that the Partial Underground Alternative could easily be modified to address the concerns of the City of San Bruno and that once that is addressed there could be an option which has the least health risks for all property owners along the route and is less expensive for ratepayers and PG&E.

The City of Millbrae also submitted comments stating that the analysis in the DEIR failed to analyze impacts of the 1B alternative to Millbrae. This includes (1) potential impacts to and the feasibility of interacting with utility services along El Camino Real; (2) potential cumulative impacts, particularly to businesses and services, related to the construction of the new BART/CalTrain Station and CalTrans' renovation/resurfacing projects along El Camino Real; (3) potential land use impacts and conflicts with the City's General Plan and Millbrae Station Area Specific Plans; (4) potential traffic and circulation impacts along El Camino Real and throughout the City; and (5) potential impacts from exposure to EMF from power lines.

At the initiation of Supervisor Mark Church of the San Mateo County Board of Supervisors, the Mayors of Burlingame, Millbrae and San Bruno met and developed a compromise position based on the needs of the three cities as a whole. This compromise has been approved by each respective City Council or is consistent with the City's earlier position.

Under this compromise, the Cities are unanimous that the only acceptable alternative for the combined communities of Burlingame, Millbrae, and San Bruno is one that goes west of Skyline in this area and uses Sneath Lane. This alternative would be a hybrid of the Partial Underground Alternative and the Sneath Lane Transition Station Alternative discussed in the Draft Environmental Impact Report (DEIR). The specific route, starting at the southern end, would cross Interstate 280 at Tower 8/50 and remain entirely on the west side of the freeway. It would continue north-northwest along Skyline Boulevard/Highway 35 for 0.6 miles past San Bruno Avenue to the existing Sneath Lane Substation. At that point, a transition station would be installed adjacent to the existing substation, and the underground route would go east on Sneath Lane to join the Northern Segment of the Project. The exact details of the route will need to be reviewed for technical comments and potential impacts on Sneath Lane after further information requested by the City of San Bruno is available. However, it is critical for these communities that the CPUC select a route that stays west of Skyline in this area and uses Sneath Lane.

This alternative minimizes or eliminates possible health and safety effects on residential neighborhoods, schools and businesses within these three communities. It minimizes or eliminates adverse aesthetic impacts on current or future residential neighborhoods and commercial areas. It minimizes or eliminates adverse impacts on future development potential for housing. It minimizes construction impacts on heavily trafficked corridors. Finally, it will

R-11

Comment Set R, cont.

Billie Blanchard, CPUC c/o Aspen Environmental Group
Re: *Joint Comments of Millbrae, San Bruno, and Burlingame on the Draft EIR for the
Jefferson-Martin 230 kV Transmission Line Project*
September 10, 2003
Page 3

create a situation where affected residents, energy consumers, and the energy supplier reach a win-win-win solution.

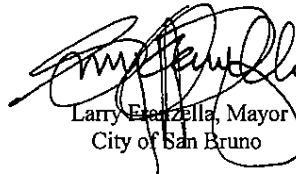
This compromise is not a change in the position taken by each city in their comments on the DEIR. If the project is viewed on a city-by-city basis, the earlier comments accurately reflect the needs and concerns of that individual city. Moreover, each city has asked for further information from the environmental consultants that is important to the city and should be provided.

However, each of these Cities recognizes that it is important to look beyond their individual boundaries to determine what is best for the communities as a whole. A compromise or consensus of this nature, particularly within the communities that are most impacted by this Project, should be given great weight and consideration by the CPUC in its decision. This compromise looks at the environmental cost/benefit of the Project as a whole, not just isolated segments of the proposal. It ensures that the potential benefits and burdens of the Project are spread equitably among the communities as a whole to the greatest extent possible.

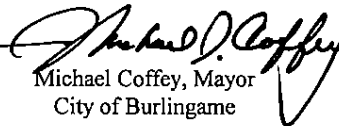
The Cities of Burlingame, Millbrae and San Bruno therefore ask the CPUC to adopt this compromise position as the best alternative for the communities in this area.



Linda T. Larson, Mayor
City of Millbrae



Larry Eterzella, Mayor
City of San Bruno



Michael Coffey, Mayor
City of Burlingame

cc: Charlotte TerKeurst, Administrative Law Judge
Loretta M. Lynch, Commissioner
Members, Burlingame City Council
Members, Millbrae City Council
Members, San Bruno City Council
Members, San Mateo County Board of Supervisors
P.G.&E.

R-11

Comment Set R, cont.



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September 18, 2003

Commissioner Loretta Lynch
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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

Dear Commissioner Lynch and Ms. Blanchard:

We write with respect to the Jefferson-Martin (JM) 230 kV Transmission Line Project and the draft Environmental Impact Report currently under review.

We represent major portions of the area through which the current Jefferson – Martin existing line now runs and through which the proposed transmission line upgrade would run.

There have been numerous comments submitted to you from various individuals, groups and constituencies regarding the various routes under consideration and the impacts those routes will have on the residents of San Mateo County.

We strongly encourage the California Public Utilities Commission to carefully review these comments and concerns regarding the health, safety and environmental impact of the transmission line project and the route to be chosen.

Our purpose in writing is urge that you consider a route which we believe will have the least amount of impact on the fewest residents and also ensures the fewest impacts on the pristine watershed lands which some proposed routes (i.e., the Partial Underground Alternative (PUA) and variants of the PUA) would now significantly degrade.

R-12

Comment Set R, cont.

R-12

As you know, the proposed route that is commonly referred to as 1B now takes the new JM line underground from the Jefferson substation along Cañada Road and Skyline Boulevard to Trousdale Boulevard in Burlingame. We respectfully request that the Commission consider another route from this point north to avoid taking the line down Trousdale. Instead, we ask that you request that PG&E develop a route that would continue to keep the line underground and, at the most appropriate location, take the line back across Highway 280 and onto watershed lands where the line could go north under existing trails, service roads or bike routes until it rejoined Skyline Blvd on the west side of Highway 280. At that point the line could continue underground along Skyline to Sneath Lane, turn right and travel down Sneath and connect to routes under consideration that would take the project eventually to the Martin substation.

This route has numerous advantages. First, it keeps the new line underground so there are no visual impacts. Second, it avoids the line traveling near the numerous homes, businesses and the school which currently exist along Trousdale in Burlingame. Third, it avoids tearing up El Camino Real through Millbrae and San Bruno which has only recently been repaved. Fourth, it eliminates the need to build new towers and access roads in pristine watershed lands that have been proposed in other scenarios, specifically the PUA and variants of the PUA, and thus avoids harming precious habitats in that environment. Approvals for routes which significantly damage pristine watershed lands may take years to obtain due to regulatory requirements and opposition. Fifth, you have already received support for an underground route along Skyline Boulevard and Sneath Lane in San Bruno from leaders in San Bruno.

We believe this project is very much needed for northern San Mateo County to ensure an uninterrupted supply of power in the future. We believe our proposed route will minimize the concerns of local officials and residents which can greatly assist in ensuring the project is built in a timely fashion.

Thank you for your consideration of our suggestion.

Sincerely,


Supervisor Jerry Hill


Supervisor Mike Nevin

cc: Mr. Aaron Johnson, Advisor to Commissioner Lynch (via fax)
Mr. Paul Clanon, Head of Energy Division (via fax)
Mr. Rob Feraru, Acting Head of Energy Division (via fax)

Responses to Comment Set R – County of San Mateo

- R-1 Please see General Response GR-1 regarding EMF, which presents additional data for two alternatives. This information has also been incorporated into Section D.8.7.4, in which magnetic field levels for the PG&E Route Option 1B Alternative and the Partial Underground Alternative were not presented in the Draft EIR.
- R-2 The EIR presents detailed and comprehensive analysis of impacts to visual resources, biological resources, and recreation, devoting approximately 300 pages to discussion of these topics alone. Section D.3, Visual Resources, Section D.4, Biological Resources, and Section D.9, Recreation, identify impacts for the Proposed Project and all alternatives, and recommend a total of 40 separate mitigation measures. Specifically, Mitigation Measure B-8b requires consultation with State and Federal resource agencies to ensure appropriate protection of biological resources. This measure has been modified to require that County representatives be included in consultation concerning Edgewood Park and San Bruno Mountain.
- R-3 The EIR's approach to comparison of alternatives, defined in Section E.1, acknowledges the importance of balancing impacts among affected routes and alternatives in order to determine the environmentally superior alternative. While the EIR considers only environmental issues, as defined under CEQA, the CPUC's general proceeding may consider other balancing issues such as community values and project need.
- The analysis of alternatives presented in Appendix 1 (Alternatives Screening Report) focuses on avoidance of Proposed Project impacts to residential areas and other sensitive land uses (e.g., schools, valuable habitat, and recreation areas). It is agreed that minimizing impacts to residences is a high priority, as residences are considered to be sensitive land uses. In addition, the EIR attempts to follow established utility corridors where they exist. However, alternatives outside of these existing corridors are also presented where there appears to be the potential for overall environmental benefit, and where impacts to sensitive receptors are not significant. Please see General Response GR-2 regarding consideration of project effects on property values.
- R-5 The County's preference for the Partial Underground Alternative with the Sneath Lane Alternative Transition Station and Sneath Lane Underground Route is acknowledged. In addition, the County's support for a hybrid alternative (Route Option 1B in the south and the Partial Underground Alternative north of Hayne Road) is acknowledged. The CPUC appreciates the County's efforts to develop a consensus among cities affected by the southern segment of the project.
- R-6 The County's support for a safe and reliable energy distribution system (and not the No Project Alternative) is acknowledged.
- R-7 This EIR is intended to allow for review of the Proposed Project by the public and affected agencies. Section B (Description of Proposed Project), along with Figure B-3a provide a sufficient level of detail for plans associated with tower removal and replacement in Edgewood Park for County Parks to review the potential project impacts on park activities and grant programs. Additionally, per APM 5.4 in Section D.9 (Recreation), all construction activities affecting Edgewood parklands would be coordinated with County Parks 30 days prior to the beginning of construction in these areas.

R-8 Recreation Impact R-2 (Construction Disturbance at Recreation Facilities) in Section D.9.3.4, Disruption of Recreational Activities, has been modified to reflect that County Parks intends to construct improvements to Sawyer Camp Trail over the next three years. Construction impacts to Sawyer Camp Trail would be mitigated to less than significant levels with the implementation of the following existing EIR Mitigation Measures: R-2a (Avoid Peak Use Periods and Notify On-Site), V-1a (Reduce Visibility of Construction Activities and Equipment), L-4a (Provide Construction Notification), L-4b (Provide Public Liaison Person and Toll Free Information Hotline), and L-7a (Provide Continuous Access to Properties). No additional mitigation is necessary. However, any significant impacts resulting from County Parks construction improvement or maintenance activities must be mitigated by County Parks. As long as County Parks & Recreation Division activities result in less than significant impacts, then no significant recreation impacts would occur between the combined projects.

Conflicts between Proposed Project construction and County Parks construction would be akin to those described for Land Use Impact L-5: Interference with SFPUC Maintenance Activities. Under this impact, Proposed Project construction interference with SFPUC maintenance activities was determined to be minor and would not exceed the significance criteria. Similarly, due to the short duration and temporary nature of Proposed Project construction adjacent to the Sawyer Camp Trail, interference with County Parks & Recreation Division construction activities also would be minor. While schedule conflicts between the construction activities could result in adverse impacts, it is not anticipated that they would exceed any significance criteria. Impacts would be less than significant (Class III).

R-9 As described in Section B (Description of Proposed Project) and Section D.2.2.1 (San Bruno Mountain State and County Park Master Plan), all project activities, including staging, would occur within the Guadalupe Canyon Parkway ROW. With project activities confined to the ROW, minimizing encroachment in sensitive habitat areas, and the implementation of Mitigation Measure R-2b (Construction Plan for San Bruno Mountain State and County Park), which would require coordination with County Parks to ensure consistency of the project with the HCP, an amendment to the HCP would not be necessary.

R-10 Please see Responses to Comments R-1 through R-6.

R-11 Please see responses to Comment Sets B (City of San Bruno), D (City of Burlingame), and K (City of Millbrae). It is noted that the EIR considers a new transition station location suggested by the City of San Bruno (see Comment B-6). This station is described in Appendix 1, Alternatives Screening Report, in Section 4.3.1.3.

R-12 The Hill/Nevin West of I-280, East of Reservoirs Alternative, an underground route north of Trousdale Drive, has been added in response to comments and is evaluated in Section 4.2.9 in Appendix 1.

Comment Set S



State of California - The Resources Agency

DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>

POST OFFICE BOX 47
YOUNTVILLE, CALIFORNIA 94599
(707) 944-5500

GRAY DAVIS, Governor



September 8, 2003

Ms. Billie Blanchard
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Dear Ms. Blanchard:

Draft Environmental Impact Report (DEIR)
Jefferson-San Martin 230 kV Transmission Line Project
San Mateo County SCH# 2003012066

Department of Fish and Game (DFG) personnel have received and reviewed the above referenced document. The DEIR was prepared to evaluate the potential impacts of a proposal by Pacific Gas and Electric Company (PG&E) to rebuild a section of existing power lines and associated substations. The section in question is approximately twenty-seven (27) miles in length, beginning at the Jefferson substation near Woodside. From there, the overhead portion of the project roughly parallels Highway 280 to the north, a distance of 14.7 miles, terminating at a new transition station in the City of San Bruno. The remainder of the line will be underground and follow a number of streets and the BART right-of-way, ending at the Martin substation in Brisbane. The primary purpose of this project is to replace an existing 60kV line with a new 230kV line. Although the proposed activities tend to stay within existing line corridors, the route passes through a number of very sensitive areas and planned actions, such as widening the right-of-way or replacing existing towers, could result in significant impacts.

In general, a very thorough job seems to have been done evaluating the potential for the presence of special status species and habitats in the project area. Identification of possible impacts and development of mitigation measures for those impacts are not as well developed, and it is on those subjects our comments will focus. Our primary concern for most of these comments is that, in most cases, meaningful analysis has been deferred to the construction phase, or to 60 days before construction. Taking this approach not only weakens the analysis under CEQA, but creates a potentially difficult scenario in the preconstruction phase, where very little time is available to develop meaningful mitigations. We recommend the CPUC consider

S-1

Conserving California's Wildlife Since 1870



Comment Set S, cont.

Ms. Billie Blanchard
September 8, 2003
Page 2

rewriting the Biological Resources section, identifying specific impacts and developing appropriate mitigation measures at this stage. Our specific comments are as follows:

S-1

Page D.4-13: The text under Monterey Cypress Forest states that stands of this species are considered a sensitive resource by DFG and the California Native Plant Society (CNPS). This is correct, but only for native stands, which are restricted to the Monterey Peninsula. Stands located anywhere in the project area are planted and should be considered under Non-Native Plant Communities and Habitats.

S-2

Page D.4-27 California Fish and Game Code: The portion of this section relating to Fully Protected Species should be modified. Part of this section states that "The Department cannot issue permits or licenses that authorize the "take" of any fully protected species, except under certain circumstances such as scientific research and live capture and relocation of such species pursuant to a permit for the protection of livestock." The provision relating to livestock applies only to Section 3511 and not to Sections 4700, 5050 or 5515.

S-3

Section D.4.3.2 Applicant Proposed Measures: The status of these measures is somewhat unclear--are they intended to be formally incorporated as mitigation measures in the DEIR?

S-4

APM Bio-2: This measure states that sensitive areas will be identified in the field. This should be viewed as a first step and measures should be developed and stated to prevent encroachment into those areas. Some of this has been done in the following specific sections (such as B1-f), but even in those instances, detail is lacking. All sensitive areas should be fenced, or if impacts are very unlikely, flagging might be acceptable. Under no circumstances should mapping be the only methodology used to prevent inadvertent impacts during construction. Establishment of appropriate buffers and worker education should also be components of this type of mitigation.

S-5

APM Bio-7 and B-1a: These mitigation measures commit to performing a wetlands delineation survey, submitting the results to the Corps of Engineers and preparing a Mitigation Plan for approval by various agencies. In another location, the DEIR identifies the loss of approximately 0.2-acre of

S-6

Comment Set S, cont.

Ms. Billie Blanchard
September 8, 2003
Page 3

wetlands and 0.1-acre of other waters (page D.4-33). Was a formal delineation survey completed? If so, the specific impacts should have been identified and mitigation measures consistent with current standards proposed in the DEIR. If not, what is the source of the numbers on page D.4-33? DFG recommends that specific impacts to wetlands be identified and appropriate mitigation measures (including type, size and general location of sites) be developed and included in the environmental document. General parameters for planting and monitoring should be included. All sections of the DEIR relating to this subject should be internally consistent and contain the same information.

S-6

APM Bio-9 and B-8a (Edgewood blind and Edgewood Park microblind harvestmen): These mitigations address impacts to harvestmen and microblind harvestmen, rare arachnids found in serpentine areas. It is not clear if these measures will provide adequate protection to these animals. We recommend expanding this section to address the following issues:

S-7

What practical effect will avoiding specific areas when harvestmen are active have toward reducing impacts. Where are harvestmen located when they are in less active states and will these areas be impacted by construction activities? Unless harvestmen and microblind harvestmen are very mobile, there may be little difference in the level of impact relative to active or less active periods.

Is the stockpiling and re-use of topsoil intended primarily to replace serpentine habitat? Will this action in and of itself cause impacts to harvestmen?

Were surveys completed in any other locations than Edgewood Park, such as other suitable habitats along the project reach?

APM Bio-10 and B-8a (Bay checkerspot butterfly): It isn't entirely clear what avoidance procedures will be followed for this species. Under APM Bio-10, there are two conditions for work restrictions, but it is not possible to tell how they differ. If any work will take place in potential habitat areas, how will take of larval or pupated butterflies be avoided?

S-8

Comment Set S, cont.

Ms. Billie Blanchard
September 8, 2003
Page 4

APMBio-13 and B-8a (California red-legged frog; CRLF): The mitigation measures in this section appear to be entirely predicated on the assumption that any CRLF found will be dispersing or errant individuals, rather than from a permanent nearby population. We recommend this section be expanded to include the possibility that frogs from the latter category may be encountered. For example, frogs associated with a permanent pond should not be relocated to another area. In such cases, temporary exclusion fences (that must be monitored regularly) might be considered.

S-9

APM Bio-15 and B-8a (San Francisco garter snake; SFGS): As noted elsewhere, SFGS are a fully protected species, for which no take can be authorized. As such, all mitigation measures must be aimed at avoiding take, rather than compensating for it. DFG and PG&E have entered into formal agreements in the past, pursuant to Section 1802 of the Fish and Game Code, to conduct operations in such a way that no take occurs. Of necessity, these documents are very detailed and project specific. While it would be difficult to include all the conditions in an 1802 Agreement in a DEIR, particularly since some project details remain to be worked out, the mitigation measures provided in the DEIR should be more detailed. For example, development of mitigation measures is in some part deferred to the future, after surveys are done along San Andreas Lake and San Mateo Creek. We recommend that this section be reworked to provide significantly more detail on where SFGS are expected (why are they not expected in the Crystal Springs area, page D.4.47) and what measures will be implemented to avoid take of snakes. As another example, the seasonal restriction on activity should be carefully reviewed; the condition in APM Bio-15 states that tower construction between towers 12/79 and 14/95 will take place between August 1 and November 1. These towers appear to be in upland habitat and, depending on weather, snakes might be moving to burrows in that area near the end of the time period specified. If this happens, the choice of time period may actually increase the chance of a take, not decrease it. In this area, a work period in the early summer may be superior.

S-10

APM Bio-16 and B-8b (Raptors): These sections include a final statement that if the mitigation measures cannot be feasibly implemented, PG&E will discuss other measures with the resource agencies. We recommend that this language be

S-11

Comment Set S, cont.

Ms. Billie Blanchard
September 8, 2003
Page 5

amended to state: "If these measures are infeasible, PG&E will discuss alternatives with DFG and USFWS. If alternative measures are approved, the project will proceed as modified."

S-11

APM-Bio-18 and B-8b (bats): We recommend a full restructuring of this section, based on the following observations:

S-12

The number of bat species varies throughout the document, finally settling on several which seem to be selected as being tree nesting species. How were these species (pallid, long-eared myotis, and long-legged myotis) selected as being the only ones potentially impacted? If tree nesting is the concern, all three Myotis species should have been included.

The mitigation measures appear to be aimed only at day roosting bats found in trees. Will any buildings, bridges or rock outcroppings be disturbed in any locations? If so, mitigation measures for other roosting bats should also be developed.

Mitigation measures need to be included for circumstances when maternity roosts or winter roosts might be discovered. These types of roosts might be found in older trees with cavities and should not be dealt with utilizing the mitigation measures described. Use of these measures would result in destruction of a permanent roost site.

B-1b: This mitigation measure does a thorough job of describing on-site mitigation criteria, but nothing similar is provided for off-site measures. This section should be modified to provide similar guidelines for off-site mitigation.

S-13

B-1g: The proposed weed management techniques should be discussed in this section, particularly since they have the potential to cause impacts themselves.

S-14

B-5a: A proposed mitigation measure under this section is that litter or other debris that may attract animals is to be removed from the project site. With what frequency is this proposed? Unless removed daily, any piles can be

S-15

Comment Set S, cont.

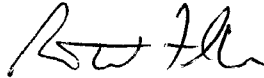
Ms. Billie Blanchard
September 8, 2003
Page 6

attractants. In areas where SFGS might be present, this is a particularly important issue, since snakes can be injured or killed when materials are moved.

Finally, in reviewing the very thorough alternatives analysis, it appears that southern Route Option 1B (the environmentally superior alternative) would have significantly fewer impacts to special status species and habitats; we therefore recommend the CPUC give consideration to adopting this alternative.

Questions regarding this letter and further coordination on these issues should be directed to Dave Johnston, Environmental Scientist, at (831) 475-9065; or Scott Wilson, Habitat Conservation Supervisor, at (707) 944-5584.

Sincerely,



Robert W. Floerke
Regional Manager
Central Coast Region

cc: Office of Planning and Research
State Clearinghouse
Post Office Box 3044
Sacramento, CA 95812-3044

U. S. Fish and Wildlife Service
2800 Cottage Way, W-2605
Sacramento, California 95825
Attn: Valary Bloom

S-15

S-16

Responses to Comment Set S – California Department of Fish and Game

- S-1 Responses to the specific comments on the Biological Resources section are provided below.
- S-2 Text has been changed in Section D.4.1.3, Plant Communities and Sensitive Habitats within the Project Area (Monterey Cypress Forest) to clarify that only native stands of Monterey Forest are considered a sensitive resource.
- S-3 Text has been changed in D.4.2.2, State Laws and Regulations (California Fish and game Code) to clarify that the provision relating to livestock applies only to Section 3511 and not Sections 4700, 5050, or 5515.
- S-4 As stated in the first paragraph of Section D.4.3.2, the CPUC monitors implementation of the Applicant Proposed Measures exactly as they do mitigation measures proposed in CPUC environmental documents.
- S-5 Mitigation Measure B-1f (Protect Sensitive Habitats During Construction) specifically states that “PG&E shall map and flag or fence” sensitive areas in the field.
- S-6 A wetland delineation was not conducted. The text on page D.4-33 was changed to indicate that an unknown area of wetlands and waters may be impacted by the project. Mitigation Measure B-1a requires that wetlands delineation be performed before the start of construction.
- S-7 According to the Stanford University Natural Resources Inventory (<http://ccb.stanford.edu/sunri/h1-1>), little general information is available on harvestmen, and still less is available on individual species. Harvestmen species associated with serpentine grassland are most active during the wet season, and typically occur at other times of the year under medium to large serpentine rocks undisturbed in the soil. Since these species are small (0.8 to 1.2 mm total body length), it is believed that although some may be lost during the construction process, others will continue to survive in cracks and crevices within the rock and soil stockpiles. This restoration process is intended to primarily replace serpentine habitat for harvestmen species and other serpentine-associated species. No project-related surveys were conducted other than at Edgewood Park. The Partial Underground Alternative (with implementation of Mitigation Measure B-1c leaving tower footings in place) would avoid impacts to known populations of both species.
- S-8 Text has been added to Mitigation Measure B-8a (Bay Checkerspot Butterfly) to include larval surveys of tower footing footprints that contain the butterfly’s food plant. If the food plant is not present, or larvae are not present in footprint areas that contain the food plant, then impacts to larvae, pupae, and/or larvae in diapause would be less than significant. If larvae are observed, consultation with the USFWS (Mitigation Measure B-8a) would result in the development of specific mitigation measures that would reduce impacts to the bay checkerspot during all life stages.
- S-9 Please see Response to Comment PG-165 below.

- S-10 Mitigation Measure B-8a (San Francisco garter snake) states that consultation with USFWS and CDFG shall be initiated by PG&E to define specific mitigation for potential impacts to the San Francisco garter snake.
- S-11 Text has been changed in Mitigation Measure B-8b (Raptors) to indicate that if the raptor mitigation measures are infeasible, PG&E shall discuss alternatives with CDFG and USFWS. Assuming that alternative measures are approved, the project would proceed as modified.
- S-12 Text was changed in Section D.4.3.3, under Impact B-8 to indicate that Mitigation Measure B-8b (Special Status Bats) takes precedence over APM Bio-18. Also, the heading was changed to "Tree-roosting Bats".
- S-13 Text modified to indicate that Mitigation Measure B-1b applies to any restoration or compensation, whether on-site or off-site.
- S-14 Weed control measures are discussed in Mitigation Measure B-1g, (Implement Weed Control). The implementation of these measures themselves, combined with Mitigation Measure B-1b, would result in less than significant impacts.
- S-15 Text has been changed in Mitigation Measure B-5a (Protect Wildlife During Construction) to indicate that litter or other debris would be removed daily.
- S-16 The CDFG's preference for Route Option 1B is acknowledged.

Comment Set T



IN REPLY REFER TO:
1-1-03-TA-3002

United States Department of the Interior

Fish and Wildlife Service
Sacramento Fish and Wildlife Office
2800 Cottage Way, Room W-2605
Sacramento, California 95825

SEP 15 2003

Ms. Billie C. Blanchard
California Public Utilities Commission
c/o Aspen Environmental
235 Montgomery Street, Suite 935
San Francisco, California 94104

Subject: Comments on the Draft Environmental Impact Report for Pacific Gas and Electric's Jefferson- Martin 230 kV Transmission Project, San Mateo County, California

Dear Ms. Blanchard:

This letter represents the U.S. Fish and Wildlife Service's (Service) comments on the Draft Environmental Impact Report (DEIR) for Pacific Gas and Electric's (PG&E) Jefferson- Martin 230 kV Transmission Project (Project). The DEIR was prepared to evaluate the potential impacts of a proposal by PG&E to rebuild a section of existing power lines and associated substations. The section in question is approximately 27 miles long, beginning at the Jefferson substation near Woodside. The primary purpose of this project is to replace an existing 60 kV line with a new 230 kV line. The project is split into two segments for analysis, the northern and southern segments.

Southern Segment

The DEIR correctly determined that Route 1B is an environmentally superior alternative to the Partial Underground Alternative (PUA) in the southern segment. Nonetheless, the analysis of the PUA in the DEIR was inadequate. The DEIR characterizes the effects of the PUA as substantially similar to the effects of the Route 1B Alternative. The data compiled in the DEIR do not support that conclusion and, in fact, suggest the opposite. Route 1B, because it involves a totally underground alignment along existing paved roads, raises fewer environmental impacts than the PUA, which involves underground construction in and adjacent to serpentine grasslands and an overhead transmission line along a new utility corridor partially in undeveloped San Francisco Public Utilities Commission (SFPUC) watershed lands.

T-1

Comment Set T, cont.

Mr. Billie C. Blanchard

2

Partial Underground Alternative:

Overhead. The DEIR does not present any detailed analysis of biological resources along the new overhead routes under the PUA. Near the southern end of its route, the overhead portions of the PUA will cross currently undeveloped parts of the SFPUC watershed. These areas include documented endangered and special-status plant and endangered Bay checkerspot butterfly (*Euphydryas editha bayensis*) populations in the vicinity of the new towers along Canada Road south of Edgewood Road, which are not discussed in the DEIR. The PUA crosses the area bounded by Edgewood Park, Canada Road, and Highway 280, “the Triangle” which supports high quality serpentine habitat, several endangered plants including the only known population of the endangered white-rayed pentachaeta (*Pentachaeta bellidiflora*), and is part of designated critical habitat for the bay checkerspot butterfly.

T-2

In addition to impacts from the new overhead portion of the PUA, the DEIR omits discussion of certain impacts associated with the underground alignment called for in the PUA. Running the underground line from tower 6/35 to the planned transition structure at tower 6/37 would require extensive tree removal for a distance of approximately 750 feet. This tree removal and that likely to be necessary at the crossing of San Mateo Creek is not discussed in the DEIR.

T-3

Underground. For about 3.5 miles between the Ralston and Carolands Substations, the lines would be installed underground where it would be adjacent to residences. Although the DEIR predicates its analysis of the PUA on the assumption that the existing 60 kV access road and right-of-way is permanently disturbed and therefore devoid of vegetation, the Service believes this is a flawed assumption. The PUA’s underground duct bank will not always be able to follow the existing road, since it must maintain a certain distance from nearby gas lines and it cannot follow the access road where it deviates to avoid unpassable features. Also, the Service has observed evidence that in some places along the access roads, adjacent vegetation has moved into the road bed, with the result of potential wetlands or serpentine grassland in the road alignment. In fact, the access roads support a greater proportion of the endangered bay checkerspot butterfly’s food plants than the surrounding grasslands in many instances, and a population of the rare Marin dwarf flax (*Hesperolinon congestum*) was found next to the access road, and would be impacted by this alternative.

T-4

In addition, the DEIR states that it would be possible to mitigate impacts to serpentine grasslands, chiefly through revegetation. However, there is insufficient seed bank available to revegetate the approximately 220,000 square feet of disturbance which would result from the PUA.

T-5

For a 1.1 mile stretch between the Carolands Substation and Trousdale Boulevard, the PUA would deviate from the I-280 corridor and travel through high quality upland San

T-6

Comment Set T, cont.

Mr. Billie C. Blanchard

3

Francisco garter snake (*Thamnophis sirtalis tetrataenia*) habitat. The Service strongly discourages this alignment in favor of, again, Route 1B.

T-6

Route 1B:

Although the completely underground Route 1B primarily avoids sensitive species issues, this alternative, along with all other alternatives, would encounter effects to California red-legged frogs (*Rana aurora draytonii*) (red-legged frogs) at the crossing of San Mateo Creek. The Service believes that the “top of the dam” option for crossing San Mateo Creek at Crystal Springs Dam offers a more environmentally sound solution than attaching the cable to the face of the dam, submerging the cable into the lakebed, or crossing the creek with overhead power lines. Although red-legged frogs are present under the road crossing of the dam, implementation of construction work windows and other protective measures could result in avoidance of the species and only temporary impacts to habitat. The project in this area should be constructed during December and January when red-legged frogs vacate the top of the dam in favor of upland habitat. Consultation with the Service on this portion of the project would be required under the Endangered Species Act.

T-7

Northern Segment

The Service believes that Route 1B, which meets with the proposed project at the east end of San Bruno Avenue, in combination with the proposed project from that point north, comprises the most environmentally superior design. However, if Route 1B is not selected for the southern segment, the transition station at San Bruno Avenue and Glenview Drive, as described in the proposed project, is environmentally superior to the Sneath Lane Substation alternative. The DEIR failed to assess effects on sensitive species from installation of a transition station in the Sneath Lane Substation area. Due to the sensitivity of these resources, detail will not be provided here, however, Dr. Samuel McGinnis submitted a letter to PG&E, dated August 4, 2003, detailing sensitive resources in the immediate area. The Service strongly believes that the proposed project, which places a transition station in a vacant lot to the southeast, is environmentally preferable to the Sneath Lane Substation alternative.

T-8

The DEIR states that the Collocation Alternative to the proposed project in the northern segment would have “no recognized resource impacts” except for the crossing of a tributary to Colma Creek, which will be bored. However, this alternative raises environmental concerns associated with high groundwater near San Francisco Bay, the potential for “frac-outs” in the soft Bay mud, and general water quality impacts from construction in close proximity to the Bay. In addition, the crossing of Cupid Row Canal would bring this alternative close to an area known to support red-legged frog habitat. Also, the potential to encounter liquefiable materials, subsurface construction debris, and other difficult soil conditions is vastly higher than along the proposed project alignment.

T-9

Comment Set T, cont.

Mr. Billie C. Blanchard

4

Although the DEIR implies impacts by saying that the proposed project would pass through San Bruno Mountain, it should be noted that the proposed route passes over San Bruno Mountain by way of Guadalupe Canyon Parkway, an existing disturbed road right-of-way, which could only result in minor indirect impacts to the resources.

T-10

Text-specific comments

Page D.4-29 (Bio-2). This measure states that sensitive areas will be identified in the field. It should be added that all sensitive areas will be fenced, or if impacts are very unlikely, flagging may be acceptable.

T-11

Page D. 4-30 (Bio-7). It is stated in this section that a wetland delineation will be conducted. However, on page D. 4-33, it is stated that 0.2 acre of wetland and 0.1 acre of other waters will be lost due to the proposed project. This creates confusion as to whether a wetland delineation was conducted or not. If a delineation was conducted, specific impacts to wetlands should be identified and appropriate mitigation measures proposed in the DEIR. General parameters for re-vegetation and monitoring should be stated.

T-12

Page D. 4-30 (Bio-10). It is not possible to tell to which period of the year construction in bay checkerspot butterfly habitat would be restricted. Although it states that work areas would be flagged, it also needs to state how far away disturbance will remain from bay checkerspot butterfly larval host plants and nectar sources.

T-13

Page D. 4-36 (B-1b). If part of the project, off-site mitigation criteria should be discussed as well as on-site mitigation. Also, the Service should receive the Habitat Restoration Plan at least 60 days prior to the start of any construction for our review and approval.

T-14

Page D. 4-38 (B-1g). The techniques used to conduct weed control should be described in detail, as these methods themselves may have potential to cause impacts to sensitive species or their habitat.

T-15

In summary, the Service strongly believes that the proposed project in the northern section and the Route 1B alternative in the southern section will result in the fewest effects to listed species and their habitats.

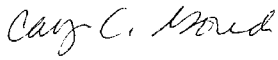

Comment Set T, cont.

Mr. Billie C. Blanchard

5

Please contact Valary Bloom or Dan Buford of this office at (916) 414-6625, if you have any questions regarding these comments on PG&E's Jefferson- Martin 230 kV Transmission Project.

Sincerely,


 Roberta Gerson
Acting Deputy Assistant Field Supervisor

cc:
CDFG, Yountville, CA (Attn: Carl Wilcox)
CDFG, Monterey, CA (Attn: Dave Johnston)

Responses to Comment Set T – U.S. Fish and Wildlife Service

- T-1 Please see Response to Comment PG-25 (below).
- T-2 Please see Response to Comment PG-145 (below).
- T-3 Please see Response to Comment PG-147 (below).
- T-4 Please see Response to Comment PG-144 (below).
- T-5 Please see Response to Comment PG-144 (below).
- T-6 Please see Response to Comment PG-146 (below).
- T-7 Please see Responses to Comments PG-5 and PG-148 (below).
- T-8 Please see Response to Comment PG-34 (below).
- T-9 Please see Response to Comment PG-40 (below).
- T-10 Please see Response to Comment PG-42 (below).
- T-11 Please see Response to Comment S-5.
- T-12 Please see Response to Comment S-6.
- T-13 Please see Response to Comment S-8.
- T-14 Please see Response to Comment S-13. Also, text was added to Section D.4.3.3, Mitigation Measure B-1b (Provide Restoration/Compensation for Vegetation Losses) to indicate that the USFWS would also receive the Habitat Restoration Plan for review and approval.
- T-15 Please see Response to Comment S-14.