

## Comments from Non-Profit Organizations and Community Groups

This section provides responses to 10 non-profit organizations and community groups that provided written comments on the Draft EIR.

- Environmental Justice Advocacy (Comment Set CC1)
- San Francisco Community Power Cooperative (Comment Set CC2)
- The San Mateo Highlands Community Association (Comment Set CC3)
- Sequoia Audubon Society (Comment Set CC4)
- People for a GGNRA (Comment Set CC5)
- Committee for Green Foothills (Comment Set CC6)
- Sierra Club, Loma Prieta Chapter (Comment Set CC7)
- For Future Generations (Comment Set CC8)
- Brisbane Chamber of Commerce (Comment Set CC9)
- South San Francisco Chamber of Commerce (Comment Set CC10)

Responses to oral comments by non-profit organizations and community groups made at the Public Participation Hearings in August are presented in the subsequent section.

## Comment Set CC1

### Jefferson-Martin Transmission Project

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**From:** Susan Lee [SLee@aspeneg.com]  
**Sent:** Tuesday, July 29, 2003 1:04 PM  
**To:** mtangard@aspeneg.com  
**Subject:** FW: San Francisco Transmission Lines jc

**From:** Francisco Da Costa [mailto:frandacosta@worldnet.att.net]  
**Sent:** Sunday, July 27, 2003 11:43 AM  
**To:** Public Advisor  
**Cc:** Gray Davis; Leland Yee; Mark Leno; Nathan Purkiss; Lisa L. Williams; Dan Bernal; Holly Welles; Edward Smeloff; Jared Blumenfeld; City Attorney  
**Subject:** San Francisco Transmission Lines jc

**Time for those in power to fix our transmission lines both outside and within San Francisco. Time to use all of the power from Hetch Hetchy.**

**Time for the Governor and the Commissioners from the California Public Utilities Commission to get their act together. Also the SF PUC, FERC, Cal ISO, and the Greedy Power Plants.**

<http://www.franciscodacosta.com/articles/transmission.html>

Francisco Da Costa  
Environmental Justice Advocacy

CC1-1

7/30/03

## Comment Set CC1, cont.

**Francisco Da Costa**  
home

### OUR TRANSMISSION LINES NEED ATTENTION

Our electrical transmission lines that bring high power electricity into San Francisco and all from the Southern part of San Francisco need urgent repair, replacement, and maintenance.

Our electrical transmission lines within San Francisco have so much leakage that we could recover this wasted energy. We could neutralize the two peaks that so much are made about when our transmission lines reach their peak. We could even shut down half of Hunters Point and some parts of Mirant.

With all the talk about Conserving Energy mostly by White folks, not once have I heard a detail evaluation of our transmission lines? We even have one main transmission line that has been dead for years. This transmission line should have been repaired a long time ago but nothing has been done. It is this type of mentality by those who pretend to help the ratepayer that have caused the Energy Crisis that we have been hearing ever since Deregulation of Energy in California.

Within California we have thousands of business that used primitive machines powered by generators producing energy that leaks. No really study has been done to recover all this ill-spent energy.

Thousands of homes have old refrigerators, fans, light bulbs, and other home appliances that are out dated. No evaluation has been done on a war footing to address this wastage of precious energy.

I spoke before the California Public Utilities Commission. Prior to that I heard these White folks discuss various topics about Energy Power Plants, Natural Gas, and other issues mostly linked to Marketing and making money factors linked to the business of Energy in all forms.

California once belonged to the First People. Most of the land was pristine.

We have large Power Plants fueled by fossil fuels. We have others fueled by Natural Gas. We have some energy created by Solar Power. And as the years go by there will be Wind Power leading the way.

We can also created Energy by using Tidal Power. This is a fairly new concept but it has been created more in Europe. There are other methods of creating energy but I have mentioned some of the major sources of energy that California can produce.

CC1-2

## Comment Set CC1, cont.

CC1-2

The land that belongs to the First People also known as the Native Americans has lots of natural resources to offer. We could use it sparingly and practice conservation and recycling.

For decades Greed ruled the roast and many would do anything in the name of the Almighty Dollar. Old Power Plants pollute the Bay and the Air in San Francisco as they do all over the world. One should have some spirituality to fully understand that it is wrong for any human being to be put innocent souls in harms way. It is wrong for the Commissioners from the California Public Utilities Commission not to say one single word about pollution. To pass over the topic of Energy Consumption having Marketing Prices in mind but not the Quality of Life issues which should be paramount. Life and death issues linked to old toxic polluting fossil power plants.

In San Francisco we have the San Francisco Local Agency Formation Commission also known as SFLAFCo. This commission from time to time has discussed Conserving Energy in the most erratic manner. Some consultants come before the Commission and give presentations, which are far-fetched and unrealistic.

Good planing demands a Blue Print that lays down the basic of Energy Flow and Consumption. Good planning should give us a history of Hetch Hetchy and how this energy is used all over San Francisco. We should have a method that serves the ratepayers and demands Accountability and Transparency from PG&E and Mirant. More so from the SF PUC and CPUC. Also FERC and the Independent System Operators.

We flooded the valley that belonged to the Miwoks, stole their land, created a number of dams, and produced electricity at Hetch Hetchy. The Raker Act mandated that the City and County of San Francisco use the Electricity produced. Twenty years after Congress passed the act some greedy power mongers decided to amend the act. They chose to sell electricity and make money for the General Fund.

In the meantime Pacific Gas and Electric (PG&E) was given the free reign to sell and increase the rate of electricity year after year.

Today, even as before the PG&E works with San Francisco Department of the Environment and San Francisco Public Utilities Commission to cheat the ratepayer. The grant money given to any of these agencies all comes from the ratepayer. The Energy companies over charge the rate payers - some of the Energy Companies get fined - then lo and behold the State gives money to PG&E and the City Agencies to do good by pushing trinkets while all the time the White Boys hire their own to manage these devious schemes.

It is this discrimination that should be adjudicated in court. It is this rampant discrimination that should send many of these CROOKS to jail. If the court system was fair - the deaths of children and others that fall prey to Power Plant toxins should be the responsibility of

## Comment Set CC1, cont.

those who permit it. Sending them to the Electric Chair should be an option.

Our transmission lines both outside and inside San Francisco should be replaced, repaired, and maintained. It is paramount that we conserve energy by replacing old equipment that generates power, much of which is wasted. We ought to do all in our power to replace out dated light fixtures that consume too much electricity. It is important that we address the Energy Conservation with a vision that is not tainted with Greed and selfishness.

The world laughs at us and so do the countries of the Middle East that sell us oil and gas. We pollute our air, water and land. This land was mostly stolen from the First People the Native Americans. Here in California 18 treaties signed by the United States and the Native Americans were not ratified. We cannot and will not do justice to anyone unless we do justice to the First People.

The Strangers are so strange that they pollute their minds and souls even as they have the land, air, and water we all call America. They forget they stole the land and that as they deprived the original inhabitants from taking care of the land - they have forced toxins and pollution on the whole world.

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CC1-2

## Responses to Comment Set CC1 – Environmental Justice Advocacy

- CC1-1 The commenter's views and concerns are acknowledged. While the Jefferson-Martin project would not create new power generation, it would increase the reliability of the electric transmission system for the San Francisco Peninsula. The purpose of this EIR is to analyze potential impacts of the project proposed by PG&E. The CPUC does not have the authority to require construction of new generating facilities or the use of power from the CCSF's Hetch Hetchy facilities.
- CC1-2 Please see Responses to Comments CC1-1, CC8-6, CC8-8 for a discussion of line maintenance, use of energy conservation measures, renewable energy and other alternative energy technologies.

Section C.6 of the Draft EIR describes the No Project Alternative, which includes a discussion of existing and proposed facilities in the project area, including Hunters Point and Potrero Power Plants. For a discussion of the existing power system facilities and capabilities, please refer to Section A.2.2 in the Draft EIR. The energy flowing through the new transmission line would be generated by a range of existing power sources throughout Northern California, including natural gas-fired power plants, wind power, and hydroelectric facilities. Gas-fired power plants can cause emissions of air contaminants, but the level of power plant operation depends on the power load to be served, which would not be changed by the Proposed Project. The load forecast for the region and the area load growth are discussed in the Purpose and Need for the Proposed Project, Section A.2 of the Draft EIR.

In Section D.5, Cultural Resources, a discussion of the methodology of the analysis includes a description of the process for contacting the Native American Heritage Commission (NAHC) for information on sacred lands and for a contact list of local tribal representatives or most likely descendants (MLD's). Please refer to Appendix 6 for the NAHC correspondence letters and a table of contacts and comments (which includes Native American comments). In addition, APM 7.2 and Mitigation Measures C-1b and C-1c include consultation with and hiring of Native American monitors in the vicinity of sacred resources as dictated in the Cultural Resources Treatment Plan (see Draft EIR Section D.5.3 for the Proposed Project and Sections D.5.4 and D.5.5 for Alternatives).

## Comment Set CC2



WORKING WITH THE COMMUNITY TO SAVE MONEY, ENERGY AND THE ENVIRONMENT

August 15, 2003

Billie Blanchard  
California Public Utility Commission (CPUC)  
C/o Aspen Environmental Group  
235 Montgomery Street, Suite 935  
San Francisco, California 04104

**Re: Jefferson-Martin Transmission Line Upgrade**

Dear M. Blanchard:

On behalf of our more than 1,200 residential and business members, San Francisco Community Power Cooperative encourages the CPUC to adopt its recommendation to approve Pacific Gas and Electric Company's (PG&E) Jefferson-Martin transmission upgrade. SF Co-op believes that the Commission's preferred approach of partial under-grounding reflects an appropriate balance between the project's electric reliability and environmental benefits and associated costs.

In addition to supporting the transmission investment, SF Co-op encourages the Commission to insist that the California Independent System Operator (Cal-ISO) clearly state how completion of the project would impact the need for in-San Francisco generation. PG&E has provided compelling evidence that Jefferson-Martin, combined with other in-process transmission upgrades and the addition of new smaller-scale combustion turbines, would serve to eliminate the need for the old, inefficient, and highly-polluting Hunters Point and Potrero Power Plants. Jefferson-Martin's economic and environmental value would be considerably higher if this view was accepted by Cal-ISO, and reflected in their San Francisco and Peninsula reliability criteria.

Sincerely,

A handwritten signature in black ink, appearing to read "SM", is placed above the typed name of the sender.

Steven Moss  
Executive Director

CC2-1

## Responses to Comment Set CC2 – San Francisco Community Power Cooperative

CC2-1 The commenter's recommendation for project approval is noted. The proposed Potrero Power Plant Unit 7 and closure of Hunters Point Power Plant (HPPP) Unit 4 are discussed in Section C.6 on page C-51 in the Draft EIR under the No Project Alternative. Regarding the need for additional electrical reliability in San Francisco, improvements in both transmission and generation are recommended by the California ISO. The ISO is the authority that would determine when it can be closed in order that closure has no serious effects on the region's ability to provide electric service. The CPUC is required, independent of HPPP closure and energy conservation measures in place, to consider the effects of the Proposed Project. The Purpose and Need for the Proposed Project is briefly discussed in Section A.2, but it is not an issue addressed under CEQA. The need for this project is not addressed or decided within this EIR (see Response to Comment CC8-1). The CPUC Administrative Law Judge would evaluate project need during the General Proceeding at a later date based on information presented by PG&E, Cal ISO, and other parties.



## Comment Set CC3

### THE SAN MATEO HIGHLANDS COMMUNITY ASSOCIATION

1851 Lexington Avenue, San Mateo, CA 94402

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

26 August 2003

Dear Ms. Blanchard:

The following letter is a response from the Highlands Community Association (HCA) to the Draft Environmental Impact Report assessing the Jefferson-Martin 230 kV Transmission Project proposed by Pacific Gas and Electric Company, Application No. 02-09-043. Thank you for affording us this opportunity to share with you and the members of the Aspen Environmental Group the opinion of our community of 750 single family homes along Pulgas Ridge stretching roughly from the Crystal Springs Dam in the north to State Route 92 in the south. These remarks are to be read as referring exclusively to that neighborhood.

Opposition of the HCA to alternative 1A is unanimous. Among the reasons that this position is taken derive from the following negative impacts of the proposal such as the following:

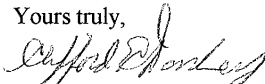
- The EMF and other threats to the health and safety of the residents of the Highlands community and
- The adverse effects on scenic views both from within the community and from the outside looking at our community.

The HCA supports alternative 1B and strongly recommends combining the present 60kV lines with the undergrounding of the proposed 230kV lines, providing that no towers be erected at or near the Crystal Springs Reservoir Dam nor below in Crystal Springs Canyon to effect a crossing of San Mateo Creek.

The HCA wishes that further analysis and attention be paid to the option of supplying some of the needed power to San Francisco through methods of local power generation in San Francisco, thus obviating the need for so great a level of electricity transmission over such great distances.

The HCA respectfully requests that pleas from PG&E to keep costs to a minimum be mitigated by the authors of the final EIR to a level of insignificance by recognizing that while the residents of this most desirable neighborhood greatly value the importance of San Francisco to their cultural lives, at the same time they should not be asked to shoulder the weight of the numerous negative impacts of the Jefferson-Martin 230 kV Transmission Project, no matter how important the construction of that Project may be to the alleged powerless citizens of the City of San Francisco.

Yours truly,



Cliff Donley, President

CC3-1

CC3-2

CC3-3

CC3-4

## Responses to Comment Set CC3 – The San Mateo Highlands Community Association

- CC3-1 The commenter's opposition to the Proposed Project is noted. Please see General Response GR-1 regarding EMF. Sections D.2.1 and D.2.3 (Land Use), D.3.1 and D.3.3 (Visual Resources), D.4.1 and D.4.3 (Biological Resources), and D.9.1 and D.9.3 (Recreation) in the Draft EIR discuss the ecological and/or scenic qualities of the environmental setting of the I-280 corridor and the SFPUC Watershed, and how the Proposed Project would affect each individual issue area (both construction and operational phases).
- CC3-2 The commenter's support for PG&E Route Option 1B and recommendation of a 60 kV collocation is noted, with no towers being erected at or near Crystal Springs Dam or in the canyon of San Mateo Creek. Please see Response to Comment N-4 and Section 2.3.2.1 in Appendix 1 for a discussion of the CEQA legal issues regarding line collocation. Section 4.2.1 of Appendix 1 in the Draft EIR discusses various options of crossing Crystal Springs Dam. See Response to Comment 4-10 for a discussion regarding an underground crossing of San Mateo Creek. Sections D.3.4.1 and D.3.4.2 (Visual Resources) discuss the visual impacts of overhead crossings of Crystal Springs Dam and San Mateo Creek.
- CC3-3 Please see Response to Comment CC1-1. Also, please see the No Project Alternative in Section C.6 for a discussion of existing and proposed local San Francisco power generation options. In addition, EIR Appendix 1 (Alternatives Screening Report) considered generation alternatives in its discussion of "Non-Wires Alternatives" in Section 4.5.1.
- CC3-4 Please see General Response GR-3 for a discussion of benefits and burdens of the Proposed Project.

## Comment Set CC4

### Jefferson-Martin Transmission Project

**From:** Leslie Flint [flint@earthlink.net]  
**Sent:** Wednesday, August 27, 2003 9:46 PM  
**To:** jeffmartin@aspeneq.com  
**Subject:** Jefferson-Martin 230kV Transmission Line Project



**PGE towrs  
lttr.doc**

August 27, 2003

To: Ms. Billie Blanchard  
California Public Utilities Commission  
c/o Aspen Environmental Group

Dear Ms. Blanchard:

I am writing on behalf of Sequoia Audubon Society, the San Mateo County chapter of the National Audubon Society for the purpose of commenting on the Draft EIR for the above referenced project, Application Number 02-09-043.

1. The comments Sequoia Audubon submitted in response to the scoping meetings held were not included in the Draft EIR. We feel that it is important to include comments from all affected groups and hope it was simply an oversight at the time. I have attached that letter addressed to you and dated February 20, 2003 so that they may be included for the record.

**CC4-1**

2. While the Draft EIR addresses the avian species potentially affected along the project route, none of the studies looked at nocturnal migrants. Since the project transects two major water areas - the Pacific Ocean and the San Francisco Bay, with the reservoirs in between, it is highly likely that large concentrations of shorebirds move from one side of the San Francisco Peninsula to the other on a daily basis seeking suitable shelter and food. In addition, during migration, passerines fly primarily at night. Since we are on the Pacific Flyway all birds that use the flyway should be considered; not just those cited in the study. We feel that the Draft EIR inadequately addresses the potential for bird strikes and electrocutions, not only for resident birds, but also for migrants.

**CC4-2**

Since there doesn't seem to be any data showing the incidence of bird strikes/electrocutions along the existing 60kV line, we feel this should be studied. Please note however that a power line census done only periodically will not give PG&E a true sense of the total number of birds that might strike the lines either day or night. A bird killed will disappear within one day of having died; thus unless the surveys are done daily, PG&E cannot have a true picture of mortality. A suggestion for mitigation was that the lines might be "marked" so that they are more visible to birds. However, this will obviously not work in the case of nocturnal migrants. We would like to know what the mitigation might be for resident and migrant birds - the Draft EIR does not address this.

3. Sequoia Audubon prefers the "no project" alternative. The need for additional power has lessened greatly since this project was proposed, and other technology may be available by the time it is really needed. However, if the project must be completed, Alternative 1B would be environmentally superior.

**CC4-3**

Thank you for considering our comments.

Sincerely,

Leslie Flint  
Sequoia Audubon Society Conservation Committee

## Comment Set CC4, cont.

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

Feb. 20, 2003

Dear Ms Blanchard,

Sequoia Audubon Society wishes to raise questions to be studied in the environmental impact report for the proposed Jefferson-Martin 230 kv Transmission Line Project by P. G. and E. Co., application No. A-02-09-043.

Although there are numerous important and valid questions that have been raised during the public scoping sessions which deserve serious study our comments are related primarily to concerns about wildlife and habitat.

First, we urge the careful study of the potential impact of larger and taller towers and more power lines on birds. The greatest impact may be on raptors, both migrating and resident, hunting, roosting, or flying through the area. However, the effect on other resident and migratory birds should also be critically considered. What would be the effects of undergrounding the lines as compared to erecting towers, particularly if routed outside sensitive areas of Edgewood Park?

**CC4-4**

Secondly, the ecological and scenic qualities of the 280 corridor which is part of a Scenic and Recreational Easement adjoining an area designated as an international heritage site should be an important backdrop for the environmental impact study. The San Francisco Watershed is known to be the most ecologically diverse area in the Bay Area. How does the construction phase and long term presence of the proposed towers affect these qualities? By comparison, how would undergrounding the lines affect them?

**CC4-5**

Thank you for considering our comments; we look forward to reviewing the EIR when completed.

Sincerely,

Robert R. Wilkinson  
Sequoia Audubon Society Conservation Committee

## Responses to Comment Set CC4 – Sequoia Audubon Society

CC4-1 The Audubon Society letter dated February 20, 2003 was received and noted during the scoping process. A summary of these written comments is located on Draft EIR page B.2-1 of Appendix B, and the letter in full is located in Appendix C-2 of the Public Scoping Report, published in April 2003. Please see Response to Comments CC4-4 and CC4-5 below for a description of the locations within the Draft EIR that these comments were addressed.

CC4-2 The majority of migrant and resident shorebirds utilizing San Francisco Bay typically feed on exposed mudflats during low tides, and roost in upland areas, salt ponds, and levees at high tide. The shorebird community along the Pacific Ocean side of the San Francisco Peninsula is characterized by species associated with beaches and rocky intertidal habitats. It is unlikely that large concentrations of these groups regularly migrate on a daily basis across the peninsula to forage in potentially unsuitable habitat. Radio-tracking studies of western sandpipers (*Calidris mauri*), one of the most abundant wintering shorebirds in the Bay, show that it is very limited in its movements within San Francisco Bay. Birds marked in South San Francisco Bay were not found outside the South Bay despite extensive search efforts in surrounding areas; birds typically moved between Bay mudflats at low tide to salt pond roost areas at high tide regardless of time of day.<sup>1</sup>

Radar studies have found that nocturnal migrants fly at different altitudes at different times during the night. Birds generally take off shortly after sundown and rapidly gain maximum altitude. This peak is maintained until around midnight, then the migrants gradually descend until daylight. There is considerable variation, but for most small birds the favored altitude appears to be between 500 and 1,000 feet.<sup>2</sup> Results of a bird-strike study at Mare Island suggest that gulls, terns, passerines, and raptors were infrequent victims in comparison to their likely populations and were thus probably not adversely affected by power lines.<sup>3</sup>

Bird electrocution is unlikely because the high-voltage 230-kV transmission lines would have clearances between conductors or between conductors and ground that are sufficient to protect even the largest birds (see Draft EIR, p. D.4-44). However, the Draft EIR agrees that the potential for collision mortality of waterfowl and other birds is a potentially significant impact. Mitigation Measure B-7a addresses both bird electrocution and collision impacts, reducing potential impacts to less than significant levels. It is likely that the incidence of bird collisions, particularly those involving waterfowl and water birds, would be similar to that associated with the existing transmission lines. Line marking would likely reduce diurnal collisions. Nocturnal migrants would likely be at an altitude that avoids the transmission lines.

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<sup>1</sup> Goals Project 2000. Baylands Ecosystem Species and Community Profiles: Life histories and environmental requirements of key plants, fish, and wildlife. Prepared by the San Francisco Bay Area Wetlands Ecosystem Goals Project. P.R. Olofson, editor. SFBWQCB, Oakland, Calif.

<sup>2</sup> U.S. Geological Survey. 2003. Northern Prairie Wildlife Research Center. Migration of Birds: Migratory Flight Altitude. Internet <http://www.npwrc.usgs.gov>

<sup>3</sup> Pacific Gas and Electric Company. 1992. Bird Mortality in Relation to the Mare Island 115-kV Transmission Line: Final Report 1988-1991. Prepared for the Department of the Navy. PG&E Report Number 443-91.3.

CC4-3 Please see Response to Comments 40-7 and CC2-1 for a discussion of project need and load forecasts. The commenter's preference for the No Project Alternative followed by PG&E Route Option 1B Alternative is noted. As discussed in Sections 4.3 and 4.4 of the Executive Summary of the Draft EIR, PG&E Route Option 1B Alternative was found to be the environmentally superior alternative in the Southern Segment of the project area compared to both the Proposed Project and the No Project Alternative, respectively.

CC4-4 Impact B-7 (Bird Electrocution and Tower/Line Collisions), beginning on page D.4-44 in Section D.4, Biological Resources, of the Draft EIR discusses the impact of larger and taller towers and more power lines on birds flying through the area. APM Bio-8, presented by PG&E in the PEA, in conjunction with Mitigation Measure B-7a, are presented in the Draft EIR to reduce potential impacts of bird electrocution and collision to less than significant levels. In addition, impact to specific species, such as raptors, are also addressed under Impact B-8 (Habitat Removal or Disturbance of Special Status Wildlife Species), and impacts would be reduced to less than significant with the implementation of Mitigation Measure B-8a (Protection for Special Status Wildlife Species). Also, please see Response to Comment CC4-2.

As stated in the summary of PG&E Route Option 1B Alternative on page D.4-56 in the Draft EIR, with undergrounding the lines "no overhead towers would be constructed or removed, no new conductors and fiber optic wires would present collision potential for birds..." In Section D.4.4.2 beginning on page D.4-56 in the Draft EIR, the Partial Underground Alternative discusses the effects of the removal of towers in Edgewood Park stating, "this alternative would eliminate the Proposed Project's installation of new towers within Edgewood Park, would allow removal of existing towers, eliminating the need for future maintenance activities in that highly sensitive area..." Both removal of the towers, as well as undergrounding the transmission lines, would reduce the potential for significant impacts to birds and/or would improve the baseline conditions.

Also, please see Response to Comment PG-164 regarding the impact of bird electrocution and collision.

CC4-5 Sections D.2.1 and D.2.3 (Land Use), D.3.1 and D.3.3 (Visual Resources), D.4.1 and D.4.3 (Biological Resources), and D.9.1 and D.9.3 (Recreation) in the Draft EIR, discuss the ecological and/or scenic qualities of the environmental setting of the I-280 corridor and the SFPUC Watershed, and how the Proposed Project would affect each individual issue area (both construction and operational phases). Responses to Comments N-11 through N-14 and Section D.2.2.1, Federal and State Regulations, in the Draft EIR specifically discuss consistency with the Scenic and Recreation Easements (copies of the easements in full are printed in Appendix 4B). PG&E Route Option 1B and the Partial Underground Alternative both include undergrounding the transmission lines for some or all of the Southern Segment of the project area. In "Environmental Impacts and Mitigation Measures for Southern Area Alternatives," the fourth section of each issue area section in Section D, the ecological and scenic impacts are discussed and compared with respect to southern area alternatives.

## Comment Set CC5

Public Comments



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August 27, 2003

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

via fax: 650-240-1720  
hard copy to follow

**Re: Comments on Draft Environmental Impact Report: Pacific Gas and Electric Company's Proposed Jefferson-Martin 230 kV Transmission Line Project -- CPCN Application No. 02-09-043, SCH No. 2003012066**

Dear Ms. Blanchard:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the above-referenced project.

**Support for Watershed Protection Alternative:** As stated in our comments in response to the Notice of Preparation, **People for a Golden Gate National Recreation Area strongly supports the adoption of Alternative 1B**, which would underground the new 230 kV lines under Canada Road and Skyline Boulevard. As part of the project, the existing 60 kV transmission lines that traverse the San Francisco Watershed lands should be eliminated (where they become unnecessary), or undergrounded, and the 100 existing towers should be removed as part of the project.

Undergrounding of the existing lines is not a separate issue from this proposal, since PG&E proposes to modify various facilities at the substations along the way so that the "existing double-circuit 60 kV line can be replaced by a single circuit 50 kV power line" in the future. This acknowledged and planned future action must be taken into consideration under CEQA rather than segmented from the proposed project, as the DEIR erroneously concludes.

If it is not practicable to underground the entire 13 mile length, due to physical constraints with road rights of way and/or electromagnetic field impacts to adjacent residents, priority for undergrounding should be given to the segment from the Jefferson Substation north to the Carolands Substation, with adoption of the Partial Undergrounding Alternative from the Carolands Substation north to the San Bruno Substation.

CC5-1

CC5-2

## Comment Set CC5, cont.

People For A GGNRA  
Jefferson-Martin Project  
Page 2

**Importance of the San Francisco Watershed Lands:** The lands of the Peninsula watershed are recognized for their extraordinary scenic and recreational values and are nationally and internationally recognized for their natural resources and scenic beauty. These lands are part of the Golden Gate National Recreation Area, a national park, and are also within the million-acre Golden Gate Biosphere Reserve, a United Nations designation for land and water areas of extraordinary natural significance.

CC5-3

The Watershed Protection Alternative would be the least environmentally damaging alternative, and would most fully comply with county, state, and national policies for protecting the watershed lands, while meeting the objectives of the project.

**Operational Reliability, Safety, and Security Benefits:** The Watershed Protection Alternative would have the additional important benefits of increasing operational reliability, reducing potential power outages, and eliminating vulnerability of the aboveground towers to sabotage and terrorism. Security and reliability are especially important in these troubled times. The incremental cost of undergrounding, estimated by PG&E at \$40 million above the \$140 million project cost, is offset by the significant benefits of risk reduction and improved reliability.

CC5-4

**Need for compliance with the National Environmental Policy Act (NEPA):** If the project involves increasing the height of towers and the width or location of the right of way within the San Francisco Watershed lands, it will trigger the need to comply with NEPA as well as CEQA, due to the Scenic Easement and Scenic and Recreation Easement that are administered by the Golden Gate National Recreation Area.

CC5-5

Thank you again for the opportunity to comment. We urge the PUC to act with the broadest consideration of the public interest regarding this project, and to adopt the Watershed Protection Alternative.

Sincerely,



Amy Meyer  
Co-Chairman



## Responses to Comment Set CC5 – People for a Golden Gate National Recreation Area

- CC5-1 The commenter's support for PG&E Route Option 1B with the removal of the 60 kV towers is noted. The Watershed Restoration Alternative is addressed in EIR Appendix 1, Section 4.2.8, but it is not found to be the environmentally superior alternative. Please refer to Responses to Comment Set N by the National Park Service, and more specifically, Response to Comment N-4 and Sections 2.3.2.1 and 4.2.2 in Appendix 1 for a discussion of the CEQA legal issues regarding line collocation
- CC5-2 The comment is acknowledged. Under the Partial Underground Alternative, from Jefferson to Ralston Substation, the new lines would be overhead and would then be installed underground from Ralston Substation to Carolands Substation (see Section 4.2.3 in Appendix 1). Due to the highly sensitive serpentine habitat in Edgewood County Park and Preserve, underground construction in the existing ROW is not feasible. Therefore, in order to remove the existing towers from the park, the new line must be built overhead, in an alignment that would roughly parallel Cañada Road through an area known as "The Triangle". For a discussion of this area and its biological resources, please refer to Section D.4.4.2 (Biological Resources) and Response to Comment CC6-5.
- CC5-3 Sections D.2.1 and D.2.3 (Land Use), D.3.1 and D.3.3 (Visual Resources), D.4.1 and D.4.3 (Biological Resources), and D.9.1 and D.9.3 (Recreation) in the Draft EIR discuss the ecological and/or scenic qualities of the environmental setting of the I-280 corridor and the SFPUC Watershed, and how the Proposed Project would affect each individual issue area (both construction and operational phases).
- The Watershed Restoration Alternative is addressed in Appendix 1, Section 4.2.8, of this Final EIR, but it is not found to be the environmentally superior alternative. Please see Responses to Comment Set 40 for a discussion of the Watershed Restoration Alternative.
- CC5-4 One of the objectives of the Proposed Project is to further increase reliability by providing a second independent major transmission pathway into the area (see Section A.2). Both overhead and underground lines would achieve this objective.
- This Draft EIR does not address cost in the evaluation of alternatives. Cost of the project and alternatives is addressed by the CPUC Administrative Law Judge in the General Proceeding on the project. In addition, security is not an issue within the scope of this environmental analysis, but it could be considered by the CPUC in its decisionmaking process.
- CC5-5 Please see Response to Comment N-7 for a discussion of NEPA compliance. In addition, please see Responses to Comment Set N for a discussion of the applicability of the scenic and recreation easements to the Proposed Project and alternatives.

## Comment Set CC6



COMMITTEE FOR  
GREEN FOOTHILLS

August 28, 2003

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

By Fax: (415) 955-4776  
and U.S. Mail

**Re: Comments on Draft Environmental Impact Report: Pacific Gas and Electric Company's Proposed Jefferson-Martin 230 kV Transmission Line Project  
CPCN Application No. 02-09-043, SCH No. 2003012066**

Dear Ms. Blanchard,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the above-referenced project. I am writing on behalf of Committee for Green Foothills, an environmental organization with over 1300 family members throughout San Mateo and Santa Clara County. We have reviewed the very voluminous DEIR and wish to submit the following comments, which focus primarily on the southern 13-mile segment of the project.

We urge that the Decision of the California Public Utilities Commission on this project be guided by the following important environmental and operational principles:

1. Protect, and where feasible, restore the scenic, recreational, habitat, and environmental values of the San Francisco Watershed lands.
2. Comply with county, state, and federal adopted plans and policies, in particular the SFPUC Watershed Management Plan and the federally-held Scenic and Recreation Easements that cover the 23,000 acres of the Watershed.
3. Ensure maximum reliability for the transmission lines through the Watershed.
4. Provide maximum security from sabotage, vandalism, and terrorism.
5. Protect adjacent communities from exposure to electro-magnetic fields (EMFs).

**Support for Watershed Protection Alternative, (modified Alternative 1B with above-ground northern segment):** We believe that the alternative that most fully complies with the above stated criteria is Alternative 1B, with modifications as follows:

1. From the Jefferson Substation to the Carolands Substation the existing 60 kV lines should be undergrounded under Canada Road and Skyline Boulevard as part of Alternative 1B. We are informed that in some sections of this segment the north-south 60 kV line may not be necessary (the 230 kV can be stepped down, eliminating the need to bury a separate 60 kV line); where the 60 kV line is still

CC6-1

CC6-2

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## Comment Set CC6, cont.

necessary, it could be transitioned to aboveground and extended to connect with the existing taps or substations. At San Mateo Creek, the most feasible route for crossing the canyon would be to transition to overhead lines for a half mile, as described in the DEIR.

CC6-2

2. From the Carolands Substation to San Bruno, the same undergrounding of both new and existing transmission lines under existing streets is preferable. However, due to the constrictions of the right of way for streets in this area, and the difficulty of avoiding EMF impacts to residents, the Partial Underground Alternative as described in the DEIR (which proposes aboveground right of way through the constricted area) would be acceptable. The DEIR states that the SFPUC Watershed Management Plan prohibits the creation of new utility corridors, and requires that new power lines be buried, where feasible. The potential conflict that is created by an aboveground expanded or new right of way in this segment would be mitigated by the undergrounding of both existing and new transmission facilities throughout the southern segment between Jefferson and Carolands Substations.

**Undergrounding of the existing 60 kV lines is appropriate mitigation:** PG&E asserts and the DEIR apparently agrees that the applicant cannot be required to underground the existing 60 kV lines as part of the proposed project as there is no connection (nexus) between the existing 60 kV and proposed 230 kV transmission line projects. However, contrary to this assertion, PG&E proposes to reconfigure the existing substations along the way in order to allow the replacement of the existing double-circuit 60 kV line with a single circuit 60 kV line. Thus, there is a future anticipated additional project that is not just contemplated by PG&E, but is being accommodated and prepared for as part of the proposed project. We believe that not only is it required under CEQA to consider the totality of the transmission line project, but if this is done as required, the undergrounding of the existing 60 kV lines is a reasonable mitigation measure that will offset any potential visual impacts from the aboveground section of this project north of Carolands Substation.

CC6-3

The Watershed Protection Alternative would not simply avoid potential significant impacts to the celebrated environmental values of the Watershed and its adjacent residential communities, but it would also restore to a more natural state the areas most impacted by the existing 100 towers and associated transmission lines, while meeting the project's stated objectives.

**Additional operational and security benefits from Watershed Protection Alternative:** With today's increased vulnerability to vandalism, terrorism, and international sabotage, it is imperative to secure our essential public utilities. At the present time, the existing towers and aboveground transmission lines in the San Francisco Watershed are virtual sitting ducks. The incremental cost of undergrounding is greatly outweighed when considering the benefits of increased security. Additionally, underground systems reduce operational costs, an important life-cycle consideration.

CC6-4

## Comment Set CC6, cont.

We further note that PG&E proposes to underground the 12-mile segment between San Bruno and the Martin Substation. The southern segment through the watershed has greater environmental values, and is even more deserving of undergrounding than the northern segment through the San Bruno, South San Francisco, Daly City, and Brisbane.

CC6-4

**Opposition to proposed aboveground segment of “Partial Underground” Alternative between MP 0.0 and 1.9:** The DEIR describes under the Partial Underground Alternative an aboveground segment that would be constructed as shown in Figure Ap. 1-53. This Alternative is unacceptable due to its location on a new right of way through the “Triangle” area of highly sensitive serpentine grasslands within the San Francisco Watershed just west of Edgewood Natural Preserve and Park. Towers associated with construction in this area could potentially affect several species of rare serpentine-endemic plants and animals.

CC6-5

**Need for compliance with National Environmental Policy Act (NEPA):** We note that if the selected project involves construction of new higher towers or construction within a new or expanded right of way through the San Francisco Watershed lands, such action will trigger the requirement for approval by the Golden Gate National Recreation Area that holds the federal easements (a Scenic Easement over 19,000 acres, and a Scenic and Recreation Easement over 4,000 acres) of the watershed lands. This federal action will require analysis under NEPA.

CC6-6

Thank you again for the opportunity to comment on the DEIR. Committee for Green Foothills urges the adoption of the amended Watershed Protection Alternative (1B) as described in these comments.

Please continue to keep us informed as to the decision-making process, and thank you for your attention to these concerns.

Sincerely,



Lennie Roberts, Legislative Advocate  
Committee for Green Foothills

## Responses to Comment Set CC6 – Committee for Green Foothills

- CC6-1 The locations in which responses to each of the environmental and operational principles stated by the commenter can be found, are listed below.
1. Sections D.2.1 and D.2.3 (Land Use), D.3.1 and D.3.3 (Visual Resources), D.4.1 and D.4.3 (Biological Resources), and D.9.1 and D.9.3 (Recreation) in the Draft EIR, discuss the ecological and/or scenic qualities of the environmental setting of the I-280 corridor and the SFPUC Watershed, and how the Proposed Project would affect each individual issue area (both construction and operational phases).
  2. Please see Section D.2 (Land Use) and Responses to Comments N-7 through N-18 regarding consistency with NPS easements.
  3. Please see Response to Comment CC5-4 for a discussion of reliability.
  4. Please see Response to Comment CC5-4 regarding security.
  5. Please see General Response GR-1, which discusses public health and safety regarding EMF.
- CC6-2 The Watershed Restoration Alternative is addressed in Appendix 1, Section 4.2.8, of this Final EIR but it is not found to be the environmentally superior alternative. Please see Responses to Comment Set 40 for a discussion of the Watershed Restoration Alternative. Please see Response to Comment N-4 and Sections 2.3.2.1 and 4.2.2 in Appendix 1 for a discussion of the CEQA legal issues regarding line collocation. The commenter's preference for underground construction of the Proposed Project, and acceptance of the Partial Underground Alternative north of Carolands Substation are noted.
- CC6-3 Please see Comment Set N by the NPS, and more specifically, Response to Comment N-4 and Sections 2.3.2.1 and 4.2.2 in Appendix 1, for a discussion of the CEQA legal issues regarding line collocation. Also please see Responses to Comment Set 40.
- CC6-4 Please see Response to Comment CC5-4 for a discussion regarding cost and security.
- CC6-5 As illustrated in Draft EIR Figure D.4-4, the proposed overhead transmission route would require the construction of seven transmission towers within sensitive habitat areas in or adjacent to Edgewood Park and Pulgas Ridge Preserve (Towers 0/1-1/11). In comparison, the Partial Underground Alternative (Figure Ap.1-3a) would require one tower in the sensitive habitat area near the Jefferson Substation, while allowing removal of all existing towers in Edgewood Park and the Pulgas Ridge Preserve. Mitigation Measure B-1c addresses impacts associated with tower removal. Two other alternative route towers within "The Triangle", which is roughly bounded by Edgewood Road, Cañada Road, and Interstate 280, would be sited to avoid sensitive habitat (see new Mitigation Measure B-1e in Section D.4.4.2 in this Final EIR). No other sensitive habitat is present between the Jefferson Substation and Tower 1/12 of the alternative overhead route of the Partial Underground Alternative. Also, please see Response to Comment CC5-2.

Other mitigation measures for biological resources would ensure that impacts in the area of “The Triangle” would be less than significant: B-1b (Restoration and Compensation for Vegetation Losses), B-1c (Protect Serpentine Grasslands and Edgewood Park), B-1d (Perform Pre-Construction Surveys), B-1f (Protect Sensitive Habitats During Construction), and B-1g (Implement Weed Control).

CC6-6 Please refer specifically to Response to Comment N-7 for a discussion of NEPA compliance, and in general to Responses to Comment Set N for responses to GGNRA relative to the applicability of the scenic and recreational easements to the Proposed Project and alternatives.

## Comment Set CC7



**LOMA PRIETA CHAPTER**  
San Mateo • Santa Clara • San Benito Counties

August 28, 2003

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

**Re: Comments on Draft Environmental Impact Report: Pacific Gas and Electric Company's Proposed Jefferson-Martin 230 kV Transmission Line Project  
CPCN Application No. 02-09-043, SCH No. 2003012066**

Dear Ms. Blanchard,

On behalf of the more than 23,000 members of the Loma Prieta Chapter of the Sierra Club, thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report. The Sierra Club has the following comments on the DEIR and the Project mainly focused on energy policy, environmental justice, and the protection of wildlife and natural areas.

### Sierra Club Energy Policies

The Sierra Club's energy facilities policy guidelines state "generating plants should be located as close as possible to load centers to avoid unnecessary long, wide transmission corridors to encourage conservation and pollution abatement by linking environmental burdens of power generation with its benefits; and to maximize efficient use of energy...the development of new electric transmission line corridors should be kept to an absolute minimum. New transmission lines should utilize corridors already established for highways..."

A potential environmental benefit to the new proposed transmission lines are transmission losses of these higher voltage lines (230 KV compared to the existing 60 KV lines) are much less and thus less pollution will be created to generate the same amount of power (at least from the polluting fossil fuel power plants that are supplying the grid).

CC7-1

## Comment Set CC7, cont.

Energy efficiency is another key Sierra Club energy policy objective. And to that end it is environmentally preferable to reduce demand via energy efficient appliances which will minimize the need to build future transmission lines and power plants!

CC7-1

### **Closing Highly Polluting Power Plants**

The Sierra Club's environmental justice policy states: "We support the right to a clean and healthful environment for all people". The Loma Prieta Chapter of the Sierra Club requests that the older, highly polluting power plants at Potrero Hill and Hunter's Point be closed as a condition to building more power lines for the customers currently served by these plants.

CC7-2

### **Solar Technology**

PV solar reduces peak demand as stated in the DEIR. However, the rationale for elimination of the solar alternative in the Solar Technology section of the DEIR (page C-43) states "There are reliability concerns with the technical ability to use solar power because of the need for a consistent solar source". There is no supporting information for this comment, the facts are not presented, it is conclusionary and in fact this is simply erroneous!! As solar photovoltaics (PV) is very consistent and reliable (during the day). Modern PV solar panels create electricity during cloudy conditions, and they generate energy every single day of the year (although the energy output does vary based on natural insolation levels, this is the sun's intensity on the earth's surface). Most of the bay area gets on average 5.5 peak sun hours per day, for instance from this wonderful, underutilized and free renewable energy resource. There is lots of untapped solar electric potential on lots of the sunny bay area roofs. Furthermore PV solar directly matches supply with demand virtually eliminating transmission losses! The owner of PV systems get a conservative return on their investment instead of PG&E getting the money from the built in profit margins that PUC enables for building more transmissions lines.

CC7-3

### **Global Warming and the Electricity Infrastructure**

The human species is currently at a cross roads with global warming: either we implement energy efficiency and renewable energy technologies and reap the benefit in future generations or we continue doing business as usual and become even more dependent on centralized fossil fuel power plants and build more high voltage power lines thus encouraging more pollution from these sources.

CC7-4

**No Evaluation of Impacts under NEPA:** Broadening our field of comment, the Sierra Club is also concerned about the impact of the construction of the transmission lines upon wildlife and natural areas. We note that the Department of the Interior through the Golden Gate National Recreation Area, the Committee for Green Foothills, and People for a Golden Gate National Recreation Area all requested during the Scoping process that the EIR also address issues that fall under the National Environmental Policy Act (NEPA) in order to comply with the Federal easements (Scenic Easement and Scenic and Recreation Easement) held by the Secretary of the Interior over the 23,000 acres of the

CC7-5



## Comment Set CC7, cont.

San Francisco Watershed lands. The proposed project would involve increasing the width of the current 50 foot wide right of way to 100 feet, and increasing the height of the towers from the current 80 to 100 feet to 100 to 150 feet in height, thereby requiring approval by the GGNRA; this action would also require compliance with NEPA because the GGNRA approval involves a federal action. We therefore believe that the environmental evaluation must be a combined EIR/EIS, and the current document is deficient in this respect.

CC7-5

**Support for Watershed Protection Alternative:** The Sierra Club believes the Public Utilities Commission should apply the following principles in order to arrive at the best project from an environmental, operational, safety, and policy standpoint:

CC7-6

1. Provide maximum protection to the environmental, habitat, scenic, and recreational values of the San Francisco Watershed lands
2. Comply to the fullest extent with the SFPUC Watershed Management Plan, the watershed's Scenic and Recreation Easements, and other planning policies
3. Provide maximum reliability for the existing and proposed transmission systems
4. Provide maximum security from vandalism and terrorism
5. Reduce to the greatest extent possible exposure of adjacent residents in the San Mateo Highlands, Hillsborough, Burlingame, and Millbrae to electro-magnetic fields (EMFs)

In our comments in response to the Notice of Preparation, we asked that highest priority be given to undergrounding both the new 230 kV line and the existing 60 kV line between the Jefferson Substation to at least Milepost 2.0. The second priority should be undergrounding of both lines between Milepost 4 and Milepost 7. Existing towers that support the existing 60 kV line should be removed. These first two priorities are exceptionally important because of the need to avoid impacts to sensitive serpentine grasslands and other habitats at Edgewood Park and the area adjacent to the San Mateo Highlands, and to preserve the scenic, recreational and habitat values of all parks, open space preserves, and watershed lands to the maximum extent possible. The third priority we identified should be to underground both existing and proposed lines adjacent to the residential areas of Hillsborough to avoid impacts to those residents, including increased exposure to EMFs. We would expand this geographic area of concern to include the affected communities of Burlingame and Millbrae.

**Support for Modified Underground Alternative 1B south of Carolands Substation:** The project alternative that would best meet the above-stated criteria is a variation of Alternative 1B. This modified alternative would underground the proposed 230 kV lines from the Jefferson Station in Redwood City to the Carolands Substation under Canada Road and Skyline Boulevard. By installing the new 230 kV line underground, the existing north-south 60 kV line would become unnecessary, and could be eliminated through this section, with taps located at each of the existing taps that serve as connections to the existing 60 kV distribution lines within and beyond the watershed. In some cases, a short section of 60 kV line would need to be extended to connect with the new underground 230 kV line with some modification to the related taps. As we

CC7-7

## Comment Set CC7, cont.

understand it, these taps would potentially include: Watershed Tap at MP 2.7, Crystal Springs Tap at MP 7.1, and the Hillsdale Junction Switchyard at MP 6.4 (other taps or substations are already serviced by these, as stated in the project proposal). At San Mateo Creek, the least environmentally damaging and most feasible route to cross the canyon would be to transition to overhead for approximately .5 miles.

CC7-7

This Alternative 1B (with undergrounding under existing roads as described above) would avoid any significant impacts to the San Francisco Watershed lands. The existing towers along this route would be removed: in sensitive areas such as Edgewood Natural Preserve and Park, and Pulgas Ridge Open Space Preserve, the issue of removal of foundations of the towers should be determined in consultation with qualified biologists and the agencies who have responsibility for their management. This alternative would also avoid any EMF impacts to the San Mateo Highlands community.

Although PG&E argues in its September, 2002 Proponents Environmental Assessment, and the DEIR apparently accepts the assertion that there is no connection between the 230 kV transmission line and the existing 60 kV line, we note that the project, as proposed, would reconfigure the substations along the way so that “the existing double-circuit 60 kV line can be replaced by a single circuit 60 kV power line”. Thus there is a reasonably high expectation that PG&E will be proposing within the foreseeable future to retrofit the existing 60 kV line through the watershed, and under CEQA this anticipated future action should be taken into account while considering the proposed project. There would be great public benefit in removing at least half of the 100 towers that traverse the watershed lands. The undergrounding of existing lines would be an appropriate mitigation measure to address adverse impacts to scenic resources, recreational values, and wildlife impacts, particularly avian species, from the segment of the project north of Carolands that would be located above ground, with taller towers.

**Additional Operational and Security Benefits from Undergrounding Alternative:**

There would additionally be major important benefits to operational reliability over the life of the project, as well as greatly increased security from vandalism and terrorism. Both of these concerns are particularly highlighted by events of the past two years. Currently, the 100 towers within the watershed lands are highly vulnerable to any person who wishes to disrupt electrical service in this region. The incremental costs of undergrounding are minimal when life-cycle costs are considered, as well as the benefits of increased security.

CC7-8

**Opposition to Partial Underground Alternative from MP 0.0 to 1.9:** The DEIR proposes under the Partial Underground Alternatives section that the southern-most segment of the project would be constructed above-ground on a new alignment as shown in Figure Ap 103; this alternative would require disturbing the highly sensitive serpentine grasslands within the San Francisco Watershed, bounded by I-280, Canada Road, and Edgewood Road, known as “The Triangle” in order to install new towers. This area contains as many, if not more, protected serpentine endemic species as Edgewood Natural Preserve and Park; construction of new towers and associated access roads, etc

CC7-9

## Comment Set CC7, cont.

would have potential adverse impacts on those species and their habitats; therefore this alternative should be rejected.

CC7-9

**Support for Partial Underground Alternative from Carolands Substation north to San Bruno:** The DEIR describes on page AP. 1-53, the above-ground segment of the project north of Tower 8.50 near the Carolands Substation, which would cross to the west of I-280 and remain on the west side until it would rejoin the proposed route. This alternative has the advantages of avoiding major visual impacts due to the wooded terrain, and also avoids disturbance to identified sensitive habitats. The DEIR points out that the SFPUC Watershed Management Plan prohibits the creation of new utility corridors, and requires that new power lines be buried, where feasible. The above-ground segment in this area would conflict with this policy for this short segment, but we believe that the mitigation of removing the existing towers south of Carolands would be a net environmental benefit, particularly to biological and visual resources.

CC7-10


In conclusion, Sierra Club supports:

1. Alternative 1B with undergrounding of existing 60 kV transmission lines under existing roads between the Jefferson Substation and Carolands Substation. At San Mateo Creek, there would be a short above-ground section.
2. The Partial Underground Alternative between Carolands Substation and the San Bruno Proposed Transition Station.

CC7-11

Thank you again for the opportunity to comment on the DEIR. We note that it has been a daunting task to review the DEIR due to its unusual size (over 1,000 pages). For the sake of brevity we have not chosen to critique its adequacy except for the need to comply with NEPA due to the federal easements over the San Francisco Watershed lands.

Sincerely,

Melissa Hippard   
Conservation Representative  
Sierra Club, Loma Prieta Chapter

Kurt Newick,  
Global Warming & Energy Committee Chair,  
Sierra Club, Loma Prieta Chapter

## Responses to Comment Set CC7 – The Sierra Club, Loma Prieta Chapter

- CC7-1 EIR Section C.5, Alternatives Eliminated from Full EIR Evaluation, and Section C.6, No Project Alternative, address energy conservation/demand side management alternatives, and existing and proposed power plants. In the course of the alternatives screening process, the length of the route was considered, as well as the use of an existing corridor as aspects of each alternative's comparison to the Proposed Project. In addition, under policy WA-6 of the SFPUC Peninsula Watershed Management Plan, the establishment of new utility corridors on the Peninsula Watershed is restricted.
- CC7-2 The commenter's policy and concerns regarding impacts of older plants are acknowledged. However, closure of power plants is beyond scope of this EIR. Please see Response to Comment CC8-6.
- CC7-3 The use of renewable resource alternatives and clean energy, such as solar power, are considered in Section 4.5.2.2 in Appendix 1 of the Draft EIR, but do not meet project objectives and cannot provide the 300+ MW of electricity as needed under the Proposed Project (see also Response to Comment CC8-8).
- CC7-4 The commenter's concerns about global warming are acknowledged. Transmission lines are also used to transmit energy from renewable resource technologies. Please see Responses to Comments CC8-6 and CC8-8.
- CC7-5 Please see Response to Comment N-7 for a discussion of NEPA compliance. CPUC is the lead agency under CEQA only, and the National Park Service under the Department of the Interior (DOI) may take the role to prepare an EIS as the lead agency under NEPA. In a letter addressed to Barbara Goodyear, Counsel, Department of the Interior, from Pamela Nataloni, CPUC Staff Attorney, dated January 27, 2003, the CPUC states that "the environmental staff has concluded that it is not feasible to undertake the additional responsibility for the preparation of a NEPA compliant environmental document. As we discussed, due to a number of factors, any federal NEPA document should be prepared by the DOI as the stated lead federal agency for the Proposed Project. Among these factors include: (1) Whether the DOI has any federal jurisdiction related to the Proposed Project remains a subject of dispute between the Office of the City Attorney, PG&E, and DOI. (2) The DOI has not yet determined the scope or form of federal NEPA document that would be required for the Proposed Project. (3) Expanding the scope of the CEQA document to additionally comply with NEPA requirements (particularly re: the alternatives analysis), would result in substantial delay which would preclude the Commission from meeting the stringent schedule advocated by the parties and adopted by the ALJ as necessary for a final Commission decision."
- CC7-6 Please see Comment Set 40 and CC6-5 and their Responses for a discussion of the Watershed Protection Alternative and the area around Edgewood County Park and Preserve. Also, please see Response to Comment CC6-1 for a discussion regarding the five listed principles.

- CC7-7 Please see Response to Comment N-4 and Section 2.3.2.1 in Appendix 1 for a discussion of the CEQA legal issues regarding line collocation. Please see Comment Set 40 and Response to Comment 40-18 for a discussion of the Watershed Restoration Alternative.
- CC7-8 Security is not an issue within the scope of this environmental analysis, but it could be considered by the CPUC in its decisionmaking process.
- CC7-9 Please see Responses to Comments CC5-2 and CC6-5 regarding the area referred to as “The Triangle”.
- CC7-10 The commenter’s support for the Partial Underground Alternative north of Carolands Substation is noted.
- CC7-11 The commenter’s preferences are acknowledged. Also, please see previous Responses to Comments CC7-6 and CC7-10.

## Comment Set CC8

August 28, 2003

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

Re: Comments on Draft Environmental Impact Report: Pacific Gas and Electric  
Company's Proposed Jefferson-Martin 230 kV Transmission Line Project  
CPCN Application No. 02-09-043, SCH No. 2003012066

Dear Ms. Blanchard,

Questions and comments regarding this EIR:

What is the need for this new 230kV Transmission Line project?

Is it actually necessary?

What is the need for this huge increase in capacity?

What is the source of power for this increase in capacity?

What are the venues of this/these sources of power?

What type of energy is or will be used to generate this power, eg fossil fuel, coal, solar? And what percentages of each?

What will be the amounts and kind of air quality impacts from these new transmission lines and from the energy generated that will be run through these new transmission lines?

What is its comparison to the existing sources and amounts of energy transmitted along this route?

What will be the effect on wildlife and on the watershed from this massive project?

We think that energy conservation methods can be put in place that will eliminate a need for increasing capacity. It is possible that energy conservation methods alone could save around 1/3 of the amount of electricity consumed now.

What energy conservation methods are, or are any, linked to this EIR? If not, why not?

We think that available methods of energy conservation should be put in place prior to any plan to increase capacity, such as this plan.

If after those methodologies are put in place, it is determined that there is a need for increased energy capacities, any increase in capacities or new transmission lines should be linked to parallel removal in the same time period of the BayView Hunter's Point backup generators and no new backup generators be installed in that community.

The huge amounts of money required for this project could be better spent for currently available conservation methods such as insulation and solar energy.

CC8-1

CC8-2

CC8-3

CC8-4

CC8-5

CC8-6

## Comment Set CC8, cont.

How much money is the State of California putting in to subsidize this project by a private energy company, PG & E?

CC8-7

That money should and could be put instead into the State of California subsidizing solar energy including for private homes, apartment buildings (and renters), and small businesses especially; and subsidizing low income housing with insulation, especially roof, and other energy conserving methods. Where possible, passive solar retrofits should be used. In new construction, wherever beneficial solar orientation is possible, it should be required. New construction should be required to use passive solar as much as possible with orientation. Photovoltaics should be required and subsidized where necessary.

As much as possible, energy should be generated by clean, renewable methods.

CC8-8

Public buy out of private utility companies should be on the table. Public generation of electricity saves energy users money and increases accountability and transparency of the systems and builds into it the value of clean energy.

CC8-9

This project needs to comply with NEPA. An EIS needs to be put out for public comment.

CC8-10

Thank you,

Joyce M Eden, For Future Generations  
PO Box 2594  
Cupertino, CA 95015

## Responses to Comment Set CC8 – For Future Generations

- CC8-1 Please see Response to Comment CC2-1 regarding need for the Proposed Project.
- CC8-2 As discussed in Response to Comment CC8-3, the energy flowing through the new transmission line would be generated by a range of existing power sources throughout Northern California, including natural gas-fired power plants (e.g., Moss Landing and power plants in Contra Costa County), wind power (e.g., Altamont), and hydroelectric facilities. The venues, types of energy, and percentages of each do not affect the potential environmental impacts related to the Proposed Project, and, therefore, are beyond the scope of this EIR analysis.
- CC8-3 The Draft EIR discusses the air quality impacts that would occur during construction of the transmission line in Section D.10.3 on page D.10-7. The discussion of air quality impacts related to the transmission line during its operational life begins under Impact A-4 (Operational Air Quality Impacts Associated with Maintenance and Inspections) on page D.10-10. These discussions explain that the transmission line would not create any new stationary sources of emissions.

The energy flowing through the new transmission line would be generated by a range of existing power sources throughout Northern California, including natural gas-fired power plants, wind power, and hydroelectric facilities. Power plants can generate emissions of air contaminants, but power plant operation depends on the power load to be served, which would not be changed by the Proposed Project. The load forecast for the region and the area load growth are discussed in the Purpose and Need for the Proposed Project in Section A of the Draft EIR.

Deregulation of the electricity markets has made it difficult to predict which power sources would supply the load served by the transmission line. Because the CPUC or PG&E cannot predict or control how the energy would be generated, and because the source of the energy may vary day-by-day, the Draft EIR does not quantify emissions associated with the power sources. It is worth noting that California power plants are subject to various air pollution control requirements established by local air districts, CARB, U.S. EPA, and the California Energy Commission.

- CC8-4 Emissions from existing and future sources of power depend on the power load to be served, which would not be changed by the Proposed Project. Also, please see the Response to Comment CC8-3.
- CC8-5 Section D.4.3, Biological Resources, Environmental Impacts and Mitigation Measures for the Proposed Project, in the Draft EIR discusses the impacts of the Proposed Project on wildlife and the watershed and recommends mitigation measures. Section D.7.3, Hydrology and Water Quality, Environmental Impacts and Mitigation Measures for the Proposed Project, discusses the environmental impacts and mitigation measures with respect to impacts on ground and surface water in the watershed. In addition, each issue area discusses potential impacts and mitigation measures along the Southern Segment of the Proposed Project, which is located within the SFPUC Peninsula Watershed.



CC8-6 Demand side management or energy conservation is discussed in Draft EIR Section C.5.5.3, System Enhancement Alternatives, and in more detail in Section 4.5.3 of Appendix 1. It is also discussed as a component of Integrated Resource Alternative in Section C.5.5.4, Integrated Resource Alternatives, and Section 4.5.4 in Appendix 1. The CPUC supervises various demand side management programs administered by the regulated utilities, and many municipal electric utilities have their own demand-side management programs. PG&E already has a program of voluntary reduction in electricity known as Customer Energy Efficiency (CEE) in place. However, the projected CEE benefits (no more than 2 to 7 MW in the Project Area) would not defer the required capacity addition (approximately 400 MW) and it would not meet the project objective to further increase reliability by providing a second independent major transmission pathway into the area.

The closure of Hunters Point Power Plant (HPPP) Unit 4 is discussed in Section C.6.1 of the Draft EIR under the No Project Alternative. The ISO is the authority that would determine when HPPP can be closed in order that closure has no serious effects on the region's electric service. The CPUC is required, independent of HPPP closure and energy conservation measures in place, to consider the effects of the Proposed Project. Purpose and Need for the Proposed Project is briefly discussed in Section A.2, but it is not an issue required by CEQA. The need for this project is not addressed or decided within this EIR (see Response to Comment CC8-1). The CPUC Administrative Law Judge evaluates need during the General Proceeding with information presented by PG&E, Cal ISO, and other parties.

The use of renewable resource alternatives and clean energy, such as solar power, is considered in Appendix 1, Section 4.5.2 of the Draft EIR, but found not to meet project objectives. Also, please see Response to Comment CC8-8 below.

CC8-7 The Proposed Project would not be funded by any public money, but all California electricity consumers would pay for the project as part of their electricity rates. Please see Responses to Comments CC8-6 and CC8-7.

CC8-8 The commenter's preference for clean, renewable energy is noted. Conscious efforts are being made to increase the renewable resource component of California's generation supply. In response to SB 1078, which established the California Renewables Portfolio Standard Program (RPS) and the objective that 20% of electricity sold to California customers will be procured from eligible renewable energy resources by 2017, PG&E is working on a renewable resource transmission plan (SB 1038).

As discussed in Section C.5.5, Non-wire Alternatives, and Appendix 1 (Section 4.5), these technologies, such as wind, solar, and tidal energy, also have environmental consequences, feasibility problems, and may not meet the objective of the Proposed Project. Even if a renewable energy source were developed, new transmission would still be required to transmit the energy from an out-of-area source, creating similar impacts as those of the Proposed Project.

CC8-9 The purpose of this EIR is to analyze potential impacts of the project proposed by PG&E. Consideration of public generation of electricity is beyond the scope of this EIR.

CC8-10 Please see Response to Comment N-7 for a discussion of NEPA compliance.

## Comment Set CC9



PROSPERITY · PROGRESS · PROTECTION

# Brisbane Chamber of Commerce

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September 15, 2003

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

Subject: Proposed Jefferson-Martin 230 KV Transmission Line Project

Dear Ms. Blanchard:

The Brisbane Chamber of Commerce shares the concerns expressed by VWR International and the Brisbane City Council with the Modified Underground 230 KV Alternative and won't repeat them here. We think you should know that the area of Old Bayshore Boulevard seems to be constantly getting ripped up for the installation of a needed public utility improvement. Most recently it was torn up for more than a year for the relocation of the water supply line into San Francisco. Long term disruptions are, at best, inconvenient to both businesses and residents and this area has already had "its fair share."

CC9-1

While there is no question that there is a need for this transmission line project, since 9-11 two years ago it is not unreasonable to question the advisability of co-locating all major utilities. Currently the railroad tracks, the US 101 freeway, the fuel line to the airport, the Hetch-Hetchy water line to SF, and Old Bayshore Boulevard are literally within a couple of hundred feet of one another. Is it really a good idea and environmentally sound to co-locate another major utility in the same area?

CC9-2

Very truly yours,

Richard B. Kerwin  
President

cc: Brisbane City Council  
Dave Ambrose, VWR  
Daryl Whitney, Calrite Services

## Responses to Comment Set CC9 – Brisbane Chamber of Commerce

CC9-1 The commenter's concerns regarding the Modified Underground 230 kV Alternative are noted. Based on comments on the Draft EIR and additional analysis conducted for the Final EIR, the EIR now considers that the impacts of the Proposed Project's underground segment and those of the Modified Underground Alternative are comparable, and both routes are identified as environmentally superior to other northern segment routes.

With respect to impacts of the Modified Underground Alternative, please refer to Responses to Comment Set CC12 (VWR International), Responses to Comment Sets H (City of South San Francisco), and Response to Comment Set Q (City of Brisbane). Several mitigation measures are identified in the Draft EIR to minimize disruption impacts to residents and businesses. Refer to Draft EIR transportation and traffic Mitigation Measures T-1a (Prepare Transportation Management Plans), T-1b (Restrict Lane Closures), and T-3a (Repair to Damaged Road ROWs); traffic Applicant Proposed Measures (APMs) 13.6 (restricted access plan) and 13.8 (detours for pedestrian and bicycle access); land use Mitigation Measures L-4a (Provide Construction Notification), L-4b (Provide Public Liaison Person and Toll-Free Information Hotline), L-4c (Provide Compensation to Displaced Residents), L-7a (Provide Continuous Access to Properties), and L-7b (Coordinate with Businesses); noise APM 15.1 (noise suppression techniques); and utilities Mitigation Measure U-1b (Protection of Underground Utilities).

CC9-2 Increasing system diversity and reliability are discussed under the project objectives in Section A.2.1 and A.2.2 of the Draft EIR. Security is not an issue within the scope of this environmental analysis, but it could be considered by the CPUC in its decisionmaking process. Section D.14.5.6 (Public Services and Utilities) discusses space constraints with existing utilities within the Modified Underground Existing 230 kV Collocation Alternative ROW. Also, please see Response to Comment H-4.

## Comment Set CC10



### South San Francisco Chamber of Commerce

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*Sara Watson, Treasurer*  
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Prudential California Realty

*Lisa DeMattei*  
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*Mike Valencia*  
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*Linda Dellanini*  
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*Arturo Gonzalez*  
Sports & Graphics

*Valerie Summer*  
City Of South San Francisco

*Joel Spray*  
Genentech, Inc.

*Tony Clifford*  
First National Bank of  
Northern California

*Greg Cochran*  
Executive Director

September 18, 2003

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

Re: **DEIR for the Jefferson-Martin 230 kV Transmission Line Project**

Dear Ms. Blanchard:

The South San Francisco Chamber of Commerce would like to offer support for the City of South San Francisco's position on this issue. Specifically, we are supportive of the route delineated in the project description (along the BART line, McLellan Drive, and Lawndale Boulevard) and are strongly opposed to the "Environmentally Superior Alternative" (along Shaw Road, Produce Avenue, and Gateway Boulevard) because of multiple negative environmental and economic impacts of this route.

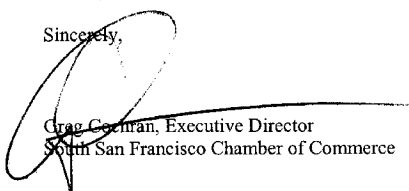
It is our understanding that the City of South San Francisco met with PG&E representatives early in the process on this project, to develop the route defined in the project description. This route is acceptable to the City and raises no significant safety or construction issues. However, the "Environmentally Superior Alternative" would create major nuisances in the City's hotel and office areas, disturb capped toxic sites, generate potential exposure of day care center children to toxics, and generally be far more problematic than the project delineated in the project description.

As the voice of business in South San Francisco, we are especially concerned about traffic impacts along Produce Avenue, and in the industrial area East of 101. Construction of a route along Gateway Boulevard at Oyster Point Boulevard would interfere with traffic from the nearly completed flyover off-ramp from southbound Freeway 101 to eastbound Oyster Point Boulevard. This intersection will likely carry over 20,000 vehicles per day when the flyover is completed.

In summary, the project as originally defined will be far less disruptive to businesses and residents attempting to access the East of 101 area, and will not generate the many problems associated with the "Environmentally Superior Alternative."

Thank you for the opportunity to comment.

Sincerely,

  
Greg Cochran, Executive Director  
South San Francisco Chamber of Commerce

CC10-1

CC10-2

## Responses to Comment Set CC10 – South San Francisco Chamber of Commerce

CC10-1 The commenter's support for the Proposed Project along the BART ROW and Lawndale Boulevard, as well as opposition to the Modified Underground Existing 230 kV Collocation Alternative, are noted. Based on comments on the Draft EIR and additional analysis conducted for the Final EIR, the EIR now considers that the impacts of the Proposed Project's underground segment and those of the Modified Underground Alternative are comparable, and both routes are identified as environmentally superior to other northern segment routes.

Also, please see Responses to Comment Set H (City of South San Francisco) and Response to Comment CC9-1 for a discussion of impacts and mitigation measures presented for the Modified Underground Existing 230 kV Collocation Alternative route. For both the Proposed Project's underground segment and the Modified Underground Alternative, mitigation measures are presented to reduce all potential impacts to less than significant levels.

A very important part of the CEQA EIR process is the analysis of a "reasonable range of alternatives." Through this screening evaluation, documented in EIR Appendix 1, alternatives were developed that met all CEQA requirements. In the evaluation of the Environmentally Superior route, all jurisdictions and potential impacts were considered together. Also, please see Response to Comment H-2.

CC10-2 The commenter's concerns about the Modified Underground Existing 230 kV Collocation Alternative are noted. As illustrated in EIR Table E-7 (Section E, Comparison of Alternatives), the alternative would have fewer impacts in seven issue areas and greater impacts in three issue areas. However, all impacts on both routes would be less than significant. As noted above, this alternative is considered to have comparable impacts (though in different environmental disciplines) to those of the Proposed Projects' underground segment, so both routes are considered to be environmentally superior

