

Comment Set CC11




P.O. Box 198 / Brisbane, California 94005 / 415-468-2272

August 26, 2003

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

In response to the PGE plan for the proposed Jefferson Martin 230 kV Transmission Line Project, we at Cal-Rite Services, Inc., would like to let it be known that we are opposed to any plan that would cause our operation to be interrupted for any period of time. We are located at 3785 Bayshore Blvd. in Brisbane. Currently, we have been told that the excavation to put the line under ground through our area will be right down the middle of our operational sides of the buildings. In other words they intend to dig a pit and trench in front of our truck loading doors and truck thorough fares. We are a trucking company that currently operates approximately 20 hours daily. This could at anytime be a 24 hour operation depending on our customers needs and requests. Our operation would not be able to close for any period of time and remain in business. Currently we have about 20 trucks that come and go all day long making deliveries and bringing in freight all along the proposed route for this excavating . I would guess that a minimum of 60 to 80 times daily, our trucks have to navigate that route in and out of our facility. In addition to our own trucks, there are many trucks coming into our neighbors in the same location. I would estimate that at least 350 people are employed by our neighbor and ourselves, which also must come and go over the same route, and any loss of production could be disastrous for business that is currently just holding on in these economic times. I would like to know why the route for the transmission line must go on the operational sides of the buildings and not the rear where the railroad passes the buildings. Currently there is a paved road that, if closed for a short period of time, wouldn't interfere with our operations. In addition, I was told that even if they went that way, they still would have to shut down the only entrance into our area because they had to go out the entrance. Again, I don't understand why they couldn't bring the line up to Bayshore Blvd just North of our entrance and therefore not interfere with our operations.

I thank you for considering other alternatives, as any alternative that interferes with our ability to operate will not be acceptable and could result in many peoples lives being ruined due to loss of employment. Please keep us informed as to how this would be resolved. Our phone number is (415) 468-2272, Fax (415) 468-2477.

Sincerely,

Daryl Whiteley
Vice President
Cal-Rite Services, Inc.

CC11-1

Responses to Comment Set CC11 – CalRite Services

CC11-1 The commenter's concerns about business disruption along Bayshore Boulevard are noted. During the Draft EIR comment period, detailed maps were prepared for the Modified Underground Alternative and distributed to affected agencies. Section 4.3.4 of Appendix 1 of this Final EIR has been updated to describe six options to this alternative route that would reduce impacts in areas where traffic congestion or business uses would be more intense. The alternative was originally proposed to be bored from Sierra Point Parkway under the railroad tracks to the south end of Van Waters and Rodgers Road, and then travel north in the road. Based on business use of the buildings (CalRite and VWR), it appears that Route Option D (illustrated on Figure Ap.1-12a) would reduce short-term construction impacts. The commenter's preference to utilize this eastern option (immediately west of the railroad tracks) is noted. This route would not require use of railroad right-of-way, but would avoid impacts on shipping activities by using the access road along the east side of the warehouse buildings. In addition, Route Option F has been developed, which would require the transmission line to continue north adjacent to the railroad tracks, north of the north end of Van Waters and Rodgers Road, and then turn west into Bayshore Boulevard within 200 feet north of the intersection. Use of this option would eliminate any possibility that project construction would impact the businesses on Van Waters and Rodgers Road. Please see Responses to Comment Set J for a discussion of use of the Caltrain railroad corridor ROW and Section 4.3.11 in Appendix 1, which evaluates the Caltrain ROW Alternative, as a new alternative added in response to comments made during the comment period on the Draft EIR.

Once a project route is selected, PG&E would be required to coordinate with affected jurisdictions, including Brisbane. This coordination would include the City's review of the final design of the project that would be built within public road ROWs through each jurisdiction's permit process. If it is determined that trenched crossings of heavily traveled streets, such as portions of Bayshore Boulevard would be too disruptive to local traffic patterns, the appropriate jurisdiction may require permit stipulations such as a bored crossing, or night-time construction to avoid adverse traffic disruptions. Also, please see Responses to Comments CC9-1, H-2, and H-6 for a discussion of potential construction impacts and mitigation measures to minimize traffic impacts and business disruption.

Also, please see Section D.12.5.6 for a discussion of the mitigation measures that would reduce traffic and transportation and land use impacts to less than significant levels. These measures include: 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).

Comment Set CC12



August 27th, 2003

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

Re: VWR Issues with Jefferson-Martin 230 kv line

Dear Billie,

VWR International will require more information on the exact planned location and project management of the proposed line alternative known as "Modified Underground Existing 230 kv Collocation Alternative and New South San Francisco Segment" across the "private Van Waters & Rogers Road" as mentioned in the "draft environmental impact report" (page ES-18). A person representing P,G & E stopped by our business and spoke to the possibility that this line may be run alongside the West side of our building (along our inbound and outbound docks) and that this would probably prevent us from using this side of the building for access for up to two weeks. All our dock doors are on this West side!

If this is true, we are unable to accept this possible business interruption because it would cause incredible damage to our company and our customers. We are a JIT Distributor of scientific products, chemicals and cleanroom supplies to the largest Biotech, Pharmaceutical and Electronic companies in the world with many commitments that would be jeopardized with any interruption to our flow of products. This facility is unique due to its hazardous chemical storage capability and the investment of approx. \$20,000,000 in inventory committed to our customers on a same day or next day basis. We ship \$1M a day to keep our customers fabs, plants and research activities running.

While we do not know presently the odds of the line being located alongside our 300,000 sqft building, or of any risks associated with the concept of running this underground line outside our building, the concept of a possible conflict to our business should be investigated further and so I plan to attend the Brisbane City Council meeting on 9/2/2003 and hope that you will be able to speak specifically to our concerns at that time. When I addressed my concerns to William Prince, Community Development Director for Brisbane he communicated your planned attendance at this council meeting.

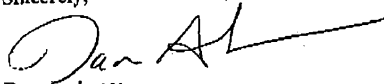
Finally, a key strategic partner to VWR may also be impacted – this is Calrite Services, the delivery company located just south of us. Any interruption to their business could be as harmful to ours and so I have asked Daryl Whiteley (V.P.) to join me in attending this 9/2/03 Brisbane meeting and I believe he has also addressed you with a letter.

Please feel free to call me if you have any questions regarding our business or concerns.

CC12-1

Comment Set CC12, cont.

Sincerely,



Dan Ambrose
Regional Distribution Manager
VWR International
3745 Bayshore Blvd.
Brisbane, CA 94005

415-330-4110

cc

William Prince - City of Brisbane
Dave Petersen - VWR
Steve Kunst - VWR
Jerry Davis - VWR
Rich Pierce - VWR
Joe Zerillo - VWR

Comment Set CC12, cont.

Jefferson-Martin Transmission Project

From: Dan_Ambrose@VWR.COM
Sent: Thursday, September 04, 2003 9:21 AM
To: jeffmartin@aspeneg.com
Cc: bologoff@ci.brisbane.ca.us; panza@ci.brisbane.ca.us; barnes@ci.brisbane.ca.us; johnson@ci.brisbane.ca.us; richardson@ci.brisbane.ca.us; wprince@ci.brisbane.ca.us; holstine@ci.brisbane.ca.us; cholstine@ci.brisbane.ca.us; darylwhiteley@yahoo.com; calrite@hotmail.com; Dave_Petersen@vwr.com; Jerry_Davis@VWR.COM; Stephen_Kunst@vwr.com; Joe_Zerillo@vwr.com; Rich_Peirce@VWR.COM; Don_Letcher@VWR.COM
Subject: VWR issues with Jefferson-Martin 230kv project



230vIssues
risbane9-3-0

To: Billie Blanchard, CPUC
C/O Aspen Environmental Group

cc: Brisbane City Council, Mayor, Manager, Director Community Development,
VWR associates and Calrite

Billie,

After attending the Brisbane City Council meeting on 9/2/03 and discussion regarding the proposed Jefferson-Martin 230 kv line routes and initial conflicts I have prepared the following addendum of comments to my first letter to you dated 8/27/03. Please include this in your submission to CPUC and consideration to the recommended route options you are to present.

Brisbane City Council and Staff,

Thank you for the opportunity to participate in this week's Council meeting and for your recognition of the issues and severe consequences possible due to this project. Representing VWR, we would very much appreciate your strong support to our concerns within the formal response from Brisbane to the CPUC. Billie made it clear to me after the Council meeting that your support to our concerns and the input to the CPUC is critical to the outcome of the route determination.

thanks to all,

(See attached file: 230vIssuesVWRBrisbane9-3-03.doc)

dan

Dan Ambrose
Regional Distribution Manager
VWR International
Ph 415-330-4110
Fx 415-330-4184
cell 415-987-2870

Comment Set CC12, cont.



September 3, 2003

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

Re: VWR Issues with Jefferson-Martin 230 kv line – Follow-up to our 9/2/03 discussion after and outside the Brisbane City Council Meeting

Dear Billie,

Thank you for your time yesterday to explain and show the “Modified Underground Existing 230 kv Collocation Alternative (forthwith referred to as “MUECA) and New South San Francisco Segment” across the “private Van Waters & Rogers Road” as mentioned in the “draft environmental impact report” (page ES-18). The map you provided showing the original proposed route, the Modified Existing Collocation (MUECA) route and a newly sketched “optional alternative route segment” (a route running on the east side of our building instead of the west side and forthwith referred to as OARS) was very helpful.

VWR will definitely face substantial financial loss if the original “MUECA” route were chosen as it would disable our irreplaceable trucking operations on the west side of our building (during construction) therefore impacting our inbound and outbound operations. We ship over \$900,000 a day in critical supplies to our customers. It is reasonable to assume collateral negative consequences for many of our customers depending on “Just In Time” daily replenishment of critical products (these include the largest Biotech, Pharmaceutical and Electronic manufacturers in the world and operating facilities in California). We are the only VWR Regional Distribution Center west of Denver and operate in a very tight space on the west side of our property with barely enough room to safely operate the numerous large tractor trailer rigs that service our docks daily. There is absolutely no room for construction equipment or a trench across this very active docking area and no reasonable alternative to support our commitments if one were attempted.

The construction of a “MUECA” trench would also cut us off from our primary California delivery agent (Calrite – located at 3785 Bayshore) in the building just south of us who would also be severely impacted by the “MUECA” route. Daryl Whiteley, Vice President of Calrite has also written you to describe the catastrophic consequences of the MUECA route.

It is encouraging to see consideration to alternatives, such as the “OARS” route sketched on the map you provided. However – on close examination a critical flaw must be alleviated to avoid the same conflicts as identified above (with the MUECA route). You show that the 230 Kv line following the OARS route would cross our leased property at the north point (where our 150+ office associates access most of their parking) and then proceed up the

CC12-2

Comment Set CC12, cont.

exclusive ramp to Bayshore (where all vehicles must access and exit this industrial complex). This ramp does not have the width to allow construction of the trench without totally cutting off all truck traffic and probably all car traffic to all three businesses in this complex which shuts down all business. If the OARS route were chosen, it should be modified to continue further up alongside the railroad tracks and then over to Bayshore at a point that will not shut down businesses.

CC12-2

After the council meeting discussion you had indicated that a representative of the "railroad companies" operating on our east side had suggested that there is room for additional utility lines and that it could be possible to run this line (underground) along the railroad tracks (on the east side) as far north as one imagined until necessary to cut westward to meet at the Martin Station (therefore avoiding significant disruption to Bayshore Blvd). This seems to be the most logical route to avoid the most traffic disruption on Bayshore or with businesses that would surely occur if the MUECA and/or OARS route were chosen. During the Council meeting, it was pointed out by our honorable Brisbane Mayor that a similar line ALREADY EXISTS ON BAYSHORE so why not put them together – and I expressed concern with my brief comments at the end of discussion that neither of these two alternatives seem to have been explored adequately.

CC12-3

Please represent our interests and concerns to the CPUC and work to find an alternative that does not significantly impact our business. It's a tough economy for us, costs to do business in California seem to be increasing at an alarming rate and the last thing we can afford is for this project to damage our business.

CC12-4

Thank you for your advice to work through our Brisbane City Council and to ask for their support via consideration within their comments/approval back to CPUC and the decision makers for this project. I have copied the Brisbane City Council, City Manager Clay Holstine and William Prince, Community Development Director in the hope that they will put our concerns foremost in the response they will return to the CPUC. I was very pleased with their interest and concerns during the council meeting for all impacts associated with this project and know they will work with the city staff to return a comprehensive perspective representing Brisbane.

Please feel free to call me if you have any questions regarding our business or concerns.

Sincerely,

Dan Ambrose
Regional Distribution Manager
VWR International
3745 Bayshore Blvd.
Brisbane, CA 94005

415-330-4110

cc
Brisbane City Council
Mayor – Cy Bologoff

Comment Set CC12, cont.

Mayor Pro Tem – Lee J. Panza
Councilperson – Michael G. Barnes
Councilperson – Clara Johnson
Councilperson – A. Sepi Richardson
William Prince – Community Development Director City of Brisbane
Clay – Holstein – Brisbane City Manager
Dave Petersen - Fulfillment V.P. VWR
Steve Kunst – Sr. V.P. Legal VWR
Jerry Davis – Sr. V.P. & GM VWR
Rich Pierce – Logistics VWR
Joe Zerillo – V.P. Distribution Services VWR
Don Letcher – Facility Manager VWR
Darryl Whiteney – V.P. Calrite
Harold Freeman – Representing Property Owner – Spear Street Associates

Responses to Comment Set CC12 – VWR International

- CC12-1 The commenter's concerns about construction of the transmission line located on the west side of the buildings on Van Waters and Rodgers Road are noted. Please see Responses to Comment Set CC11.
- CC12-2 Please see Responses to Comments CC9-1, H-2, and H-6 for a discussion of potential impacts and mitigation measures. The commenter's support for Route Option D, which would avoid construction in the loading dock area (as illustrated on Figure Ap.1-12a) is noted. In addition, Route Option F has been developed, which would avoid the entrance ramp and would require the transmission line to continue north adjacent to the railroad tracks, north of the north end of Van Waters and Rodgers Road, and then turn west into Bayshore Boulevard within 200 feet north of the intersection. Use of these options would eliminate any possibility that project construction would impact the businesses on Van Waters and Rodgers Road. With implementation of these route options and Mitigation Measure L-7a (Provide Continuous Access to Properties), and L-7b (Coordinate with Businesses), construction should not affect the businesses on Van Waters and Rodgers Road.
- CC12-3 Please see Responses to Comment Set J for a discussion of use of the Caltrain railroad corridor ROW and Section 4.3.11 in Appendix 1, which evaluates the Caltrain ROW Alternative, as a new alternative added in response to comments made during the comment period on the Draft EIR.
- CC12-4 Section 4.3.4 of Appendix 1 of the Draft EIR explains that while collocation of the proposed 230 kV line adjacent to the existing PG&E 230 kV oil-filled pipeline does not present electrical engineering constraints, there would be space and construction constraints along portions of the route. These potential space constraint feasibility issues identified during the alternatives screening process led to the development of this Modified Underground Existing 230 kV Collocation Alternative and new South San Francisco Segment, which runs along van Waters and Rodgers Road to avoid sections of Bayshore Boulevard.

Comment Set CC13



*Mills-Peninsula
Health Services*

A Sutter Health Affiliate

August 28, 2003

1788 El Camino Real
Burlingame, CA 94010
850.696.5400

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

Dear Ms. Blanchard,

We are in receipt of the notice of availability of the Draft Environmental Impact Report for the Proposed Jefferson-Martin 230 kv Transmission Line Project, dated July 16, 2003. We are aware that the underground routing of the transmission lines down Trousdale Drive is being seriously considered.


We wish to voice our strong concerns that this routing is environmentally risky. As a community hospital, our primary concern is the health of our community. We believe that the underlying science is still developing that is necessary to finalize any opinions on the environmental impact of long term exposure to EMF as a result of proximity to high voltage power transmission lines. As such, it is appropriate to keep this type of human exposure to a minimum. Therefore, we do not support routing these lines going through the residential neighborhood surrounding Trousdale Drive.

In addition, we are concerned about the interrelation of these proposed underground transmission lines with the sixty inch underground water mains serving San Francisco. We believe that the juxtaposition of these two major utilities creates an unsafe condition for any maintenance crew associated with either utility. Furthermore, these utilities would cross underground in an area proposed for the construction of a new emergency vehicle entrance to our site, and near the new main entrance to our site, during the exact time frame that our new main entrance is proposed for construction.

We hope these serious environmental issues are appropriately evaluated and given appropriate consideration.

Thank you.

Sincerely,


Robert Merwin
Chief Executive Officer
RWM/kg

CC13-1

CC13-2

Responses to Comment Set CC13 – Mills Peninsula Health Services

- CC13-1 Please see General Response GR-1 regarding EMF and Response to Comment D-6 for a discussion specific to PG&E Route Option 1B and the City of Burlingame.
- CC13-2 Section D.14.3.5 (230 kV Underground Transmission Line) in the Public Services and Utilities Section of the Draft EIR acknowledges impacts (Impact U-1, Utility System Disruption) to underground utilities throughout the underground portion (including the City of San Francisco) of the Proposed Project, and provides Mitigation Measure U-1b (Protection of Underground Utilities) to reduce impacts to less than significant (Class III) levels. The commenter is referred to Section D.14 (Public Services and Utilities) for a detailed discussion of potential service disruptions and associated mitigation measures. Also, as discussed in Section D.14.2 (Applicable Regulations, Plans, and Standards) of the Draft EIR, the responsibilities of utility operators and other excavators working in the vicinity of utilities are detailed in Section 1, Chapter 3.1 "Protection of Underground Infrastructure," Article 2 of California Code 4216, which requires that an excavator must contact a regional notification center at least two days prior to excavation of any subsurface installations.

Comment Set CC14



September 9, 2003

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

RE: Comments on Draft EIR
Proposed Jefferson Martin 230 KV Transmission Line Project

Dear Ms. Blanchard:

We received a copy of your August 26th letter to Mr. Wesley Skow of Latham & Watkins which included responses to his questions along with detailed maps illustrating the proposed "alternative route". The maps were very helpful.

If I interpret your responses to Mr. Skow's questions correctly, you are now suggesting a modification of the alternative route which would "completely avoid the Park 'N Fly lot and the Produce Terminal" (contained at the end of your response to his Question 1). If we are interpreting this correctly, we obviously support this modification enthusiastically and it makes our comments to the original proposed alternative route moot. However, in case we are misinterpreting or misunderstanding your response, we still offer the following comments to the original proposed alternative route.

The Route

1. From the maps, it is impossible to ascertain whether the route is parallel to our property in the State's ROW of State Hwy 101 or on our property itself. Is there anything that precludes it from being in the ROW and not on our property?
2. Assuming that the line must be on our property, in the interests of protecting the long-term value of the property, our preference would be that it be at the extreme eastern edge of the property, along the current fence-line as illustrated on your maps. This route would, however, create the following issue that must be dealt with:

(A) Loss of Parking Spaces – During the construction period, we would lose all of our parking spaces along the eastern edge of our property, if not more. We would expect compensation for the loss of daily revenue on those spaces at our posted daily rate for the length of time they are off-line.

CC14-1

CC14-2

CC14-3

Comment Set CC14, cont.

Ms. Blanchard
September 9, 2003
Page - 2 -

If any parking spaces are lost permanently, we would expect compensation for those spaces at the projected revenue generated over the life of our lease at the facility.

CC14-3

Naturally, we assume all construction/reconstruction (paving, striping, etc.) will be costs of the project.

(B) Gas Tank Relocation – The proposed route passes through the current location of our UST and gas pump, as well as the shelter for the pump. If the tank and shelter must be relocated, we would also expect those costs to be borne by the project. Further, if such relocation created a permanent loss of parking spaces elsewhere, we would expect compensation as calculated above.

CC14-4

(C) Entrance/Exit Plaza Modifications – should the routine of the line cause us to modify or reconfigure our entrance/exit plaza, those costs, too, should be borne by the project.

CC14-5

(D) Disruption to Business – It is likely that in addition to the revenue generating spaces we might lose during the construction period, we are likely to lose other business, either through difficulty of ingress and egress, or customers simply wishing to avoid construction debris and dust. Park 'N Fly should be compensated for any quantifiable loss during this period.

CC14-6

(E) Permitting/Construction – It is imperative that any construction/reconstruction or improvements required by Park 'N Fly, but necessitated by this project, be permitted by any and all state and local government and agencies under the same codes, ordinances and regulations as when Park 'N Fly was built and not necessarily to current code and ordinances. For example, if we need to rebuild our gas shelter or exit canopy, we can not have it trigger changes to our current landscape coverage, or installation of sidewalks, etc. Park 'N Fly should suffer no loss of parking spaces through any applicable permitting process, nor bear additional expense to “meet current code”.

CC14-7

(F) Easement Payment – We need to know that the property owners are being equitably compensated for the grant of the easement.

CC14-8

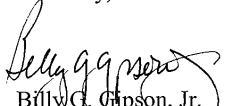
Comment Set CC14, cont.

Ms. Blanchard
September 9, 2003
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Ms. Blanchard, Park 'N Fly appreciates all of the help and cooperation you've provided to date. As I mentioned earlier, we are hopeful that the modified proposed "alternative route" will be adopted and our points will have no basis. If not, we are prepared to cooperate as best we can, provided our concerns are adequately addressed.

Thank you again.

Sincerely,



Billy C. Gipson, Jr.
Senior Vice President

BGG/jrm

cc: Martin Bloom

Responses to Comment Set CC14 – Park 'N Fly

- CC14-1 Please see Response to Comment H-6, which discusses the optional segments for the Modified Underground Existing 230 kV Collocation Alternative, including Route Option A, which would avoid the Park 'N Fly lot and Golden Gate Produce Terminal. The commenter's support for this alternative segment is noted.
- CC14-2 Final engineering of the transmission line would occur after a route is approved, at which point the exact location of the underground transmission line within each roadway will be defined.
- CC14-3 The commenter's preference for the line to be located on the eastern edge of the property, along the current fence line is noted. Please see General Response GR-2 for a discussion of property values and Response to Comment CC9-1 regarding mitigation measures that would reduce construction disruption impacts on businesses. Section D.2.5.6 (Land Use) includes Mitigation Measure L-8a (Compensate Parking Lot Owner), which specifically provides for compensation based on both temporary and permanent impacts to revenue.
- CC14-4 Final engineering of the route would incorporate design to avoid the existing UST and gas pump. However, in the event that the pump would have to be relocated, compensation would be provided as detailed in Mitigation Measure L-8a (Compensate Parking Lot Owner) in Section D.2.5.6 of the Draft EIR. Also, please see Response to Comment CC14-3.
- CC14-5 Please see Response to Comment 14-3 regarding costs and compensation.
- CC14-6 Please see Response to Comment 14-3 regarding costs and compensation.
- CC14-7 All permitting required by local, State, and federal agencies would be completed prior to the start of project construction. Section A.3 of the Draft EIR, Agency Use of this Document, discusses the permitting process and Table A-3 lists the permits required for the Proposed Project. Section D.2 (Land Use) discusses compliance with local regulations.
- CC14-8 Compensation would be handled through negotiations with PG&E, or failing that, through eminent domain proceedings. Also, please see Response to Comment CC14-3.

Comment Set CC15

Oyster Point Owners Association
651 Gateway Boulevard, Suite 1140
South San Francisco, CA 94080

September 12, 2003

VIA FACSIMILE (415-703-2200)

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

Re: Jefferson-Martin 230kV Transmission Project
Draft Environmental Impact Report (EIR)

Dear Ms. Blanchard:

On behalf of the Oyster Point Owners Association (OPOA), thank you for extending the comment period to September 13, 2003 for the above referenced Draft EIR. The OPOA, a common interest development consisting of several commercial property owners in the East of 101 Area of South San Francisco including Marriott, Slough Estates and Hines, has some serious concerns regarding the "Modified Underground 230 kV Collocation Alternative and South San Francisco Segment", which is a component of the CPUC's project alternative for the Northern Segment. Regarding this particular segment, we believe that the Draft EIR inadequately addresses specific issues in the areas of land use, public health, and geology as outlined in further detail below:

Land Use

1. The Draft EIR identifies South San Francisco's industrial use as a reason for favoring the Northern Segment Alternative. While the area east of highway 101 in South San Francisco has traditionally supported industrial uses, that has drastically changed over the last ten years. Gateway Boulevard, which is part of the route of the Northern Segment Alternative, has been redeveloped with Class A office, R&D, retail, hotel and childcare buildings and facilities. Among the many industries represented along Gateway Boulevard, are pharmaceutical, biotechnology, information technology, and software companies that would be impacted by major construction and potential power loss along the main access route to their offices. The Draft EIR fails to recognize that in the east of highway 101 and along Gateway Boulevard in South San Francisco, the use has changed from industrial to commercial thus understating the land use impact.

CC15-1

Comment Set CC15, cont.

Ms. Billie Blanchard, CPUC
September 13, 2003
Page 2 of 3

2. The Northern Segment Alternative would also significantly and negatively impact two hotels located at the end of Veterans Boulevard in South San Francisco. The portion of the alternative from the intersection of Gateway Boulevard and Oyster Point Boulevard to the railroad right-of-way in South San Francisco is the only point of ingress and egress for these two hotels. Construction of the alternative would occur right in the front yards of these two hotels and would significantly inconvenience guests. Furthermore, the construction could also result in significant loss of business for an extended period of time which is something that the hotels cannot afford to have happen. These hotels have hundreds of patrons everyday and provide vital support to the businesses that have travelers coming to South San Francisco on a routine basis. The Draft EIR makes no mention of the impact to these hotels and the guests that occupy the 350+ rooms.

CC15-2

Public Health

3. The portion of the segment from the intersection of Gateway Boulevard and Oyster Point Boulevard to the railroad right-of-way in South San Francisco possesses significant amounts of hazardous material as it was originally occupied by a former steel mill and fabrication plant. Under the direction of the Regional Water Quality Control Board, this area has been substantially and satisfactorily remediated and capped. Much of the contaminants were sealed in lead cells that are located underground. Previous and current landowners have taken painstaking measures to ensure compliance with the environmental covenants in place. The Draft EIR fails to address how the Northern Segment Alternative would address the significant risks of exposing the underground hazards which include potentially releasing existing hazardous material into the groundwater and/or the San Francisco Bay. Additionally, the Draft EIR did not clearly articulate how the CPUC's preemptive jurisdiction would address the Regional Water Quality Control Board's oversight of this area.

CC15-3

Geology

4. The portion of the segment from the intersection of Gateway Boulevard and Oyster Point Boulevard to the railroad right-of-way in South San Francisco is likely to be challenged by significant unknown underground conditions. For example, in one area, portions of a large industrial GSA facility were demolished and buried in place many years ago. Contractors who have completed underground work in the vicinity can attest to the underground risk in this area. This increased construction risk may result in extraordinary cost and schedule overruns which are costs that are ultimately borne by rate-payers. The Draft EIR does not adequately address the potential subsurface conditions of the geology as it relates to former structures that have been demolished and buried in place.

CC15-4

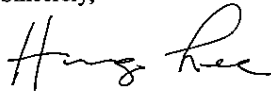
Comment Set CC15, cont.

Ms. Billie Blanchard, CPUC
September 13, 2003
Page 3 of 3

In summary, the OPOA believes that the Draft EIR has not adequately addressed some significant impacts that would result by constructing the Modified Underground 230 kV Collocation Alternative and South San Francisco Segment as a component of the Northern Segment Alternative. Further, we believe that this alternative if constructed would present significant problems to existing and future businesses and to the general public because of underground hazardous material and conditions. Finally, we urge the CPUC to reconsider the originally proposed PG&E route which was analyzed and researched in much greater detail than any of the alternatives. As a minimum we feel that keeping the route on the west side of highway 101, as the Underground Route Option 1B contemplates, would avoid the risks and impacts discussed in this letter. We look forward to the CPUC's response to these comments.

CC14-5

Sincerely,



Hanns Lee, Director and Secretary
Oyster Point Owners Association

cc: Councilman Joe Fernekes, City of South San Francisco
Greg Cochran, South San Francisco Chamber of Commerce
Kevin Mullin, Mullin Communications
Jon Bergschneider, Slough Estates
Kemper Dudley, Marriott
Melody Lanthorn, Marriott
Lisa Lewis, Hines

Responses to Comment Set CC15 – Oyster Point Owners Association

CC15-1 The commenter's concerns about the Modified Underground Existing 230 kV Alternative are noted. Based on comments on the Draft EIR and additional analysis completed for this Final EIR, both this alternative and the Proposed Project's underground segment are found to be environmentally superior to other northern segment alternatives.

Table D.2-16 in the Land Use section (Section D.5.2.6) has been modified to show that land uses along this alternative also include commercial land uses. The impacts and mitigation measures identified for this alternative in the land use section remain the same. In general, commercial and industrial land uses are preferred for locating a facility such as a transmission line, as compared to residential areas with many sensitive receptors. Also, please see Response to Comment PG-36.

CC15-2 Construction in this area should not cause a loss of business to the hotels, although it is acknowledged that coordination would be required to ensure that access is maintained throughout the construction process. Mitigation Measure L-7c has been added (Section D.2.5.6 of this Final EIR) to define specific coordination required with the hotels in this area to ensure that access is maintained.

CC15-3 The former U.S. Steel Shearwater Project (see Draft EIR, Table D.8-12, Site 33) was acquired by Chiltern Development Corporation. This facility, located north of Oyster Point Boulevard, was under the oversight of the Regional Water Quality Control Board in 1982 for site investigation and cleanup strategy of heavy metals, asbestos containing materials, and organic liquids with metals. Part of this brownfield area has been redeveloped with new commercial uses and new road construction (e.g., along the north and east side of Veterans Road), and is compatible with construction of underground utilities. Route Option E would avoid the contaminated area and allow safe construction in a manner similar to other underground utilities that exist in this roadway. See further discussion of this area in Section D.8.5.6 (Public Health and Safety, Modified Existing 230 kV Underground ROW).

CC15-4 Cost of the project is not addressed in the scope of this EIR but would be addressed by the CPUC Administrative Law Judge during the CPUC General Proceedings.

Impacts associated with encountering former structures that have been demolished and buried in place in the area north of the Gateway Boulevard and Oyster Point Boulevard intersection during construction of the Modified Existing 230 kV Underground ROW Alternative would not be considered in the Geology, Soils, and Paleontology EIR Section because this is not a natural condition.

See Public Health and Safety Section D.8.5.6 for environmental setting, impact, and mitigation measures related to subsurface hazards in this area. Route Option E (use of Veterans Boulevard) would avoid the areas of potential hazard, and result in line installation within the roadway where other utilities are located.

CC15-5 The commenter's opposition to the Modified Underground Existing 230 kV Collocation Alternative, and support for the Proposed Project or a route west of Highway 101, are noted. Based on comments on the Draft EIR, additional impact discussion, mitigation

measures, and route options to avoid identified problem areas have been added to this Final EIR. As a result of this additional information, the conclusion of the Final EIR states that the Proposed Project and the Modified Underground Existing Alternative are both found to be environmentally superior.

The Modified Existing 230 kV Underground ROW discussions in Section D of this Final EIR have been modified to include six route options (A-F). Route Option A has been identified to avoid Produce Avenue, the intersection of South Airport Boulevard and Produce Avenue, and the confined right-of-way under the Highway 101 overpass. There are three route options through the Sierra Point area: a) the originally proposed route that would be within the landscaped area immediately east of the railroad ROW; or b) with Route Option B, the line would be installed within the parking lot just east of the railroad ROW; or c) with Route Option C, the line would be further east, following Shoreline Court north to Sierra Point Parkway. Route Option D would require the line to be installed on the east side of facilities that front Van Waters and Rodgers Road, avoiding the active loading docks and paralleling the railroad ROW. Route Option E would avoid the vacant parcel north of Oyster Point Boulevard by turning east on Oyster Point Boulevard to Veterans Boulevard, where the line would turn north proceeding within the Veterans Boulevard ROW to the edge of the UPRR, re-joining the originally described alternative. Route Option F is a modification of Route Option D and would avoid the entrance ramp to Van Waters and Rodgers Road by entering Bayshore Boulevard just to the north.

Please see Responses to Comment Set H (City of South San Francisco), and specifically Responses to Comments H-1 and H-14 for a discussion of hazardous materials and conditions. Also, please see Response to Comment CC9-1 regarding mitigation measures that would reduce disruption to businesses.

Comment Set CC16

LAW OFFICES OF

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SAUL N. ROSS (1917-1997)
GORDON W. HACKETT (1925-1996)

September 18, 2003

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

Re: Draft Environmental Impact Report (DEIR) for the Proposed Jefferson-Martin 230kV
Transmission Line Project- Impact on Golden Gate Produce Terminal

Dear Ms. Blanchard:

It was a pleasure speaking with you this week and I appreciate your forwarding to me material concerning the Jefferson-Martin 230kV Transmission Line Project.

As I advised you, my offices represent the Golden Gate Produce Terminal, located at 131 Terminal Court, South San Francisco, California. The Golden Gate Produce Terminal encompasses in excess of 18 acres of space in South San Francisco and constitutes the largest and most active wholesale produce distribution site in the San Francisco Bay Area. As I related to you in our conversation, I was very surprised that Golden Gate Produce Terminal, Ltd., the Limited Partnership that owns fee title to the land upon which the terminal is located, has never received any notification from either PG&E or the California Public Utilities Commission concerning the proposed Jefferson-Martin 230kV Transmission Line Project. It is only through my involvement with the South San Francisco Chamber of Commerce did I learn of the proposed Jefferson-Martin 230kV Transmission Line Project. My client, the Golden Gate Produce Terminal along with many other businesses who are members of the Chamber of Commerce of South San Francisco are extremely concerned about the potential impact of the "Environmentally Superior Alternative" route being proposed in the Jefferson-Martin DEIR .

CC16-1

Comment Set CC16, cont.

Billie Blanchard, CPUC
September 18, 2003
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The Golden Gate Produce Terminal receives in excess of 100 delivery trucks per day at its facility. These trucks usually arrive between 10:00 pm and 7:00 am for the day's business, an important factor in the event construction occurs in the evening. Additionally, a normal day includes ingress and egress by approximately 300 employees of the terminal together with an additional 300 buyers who purchase from the various produce houses. These trucks come from all points throughout California. Upon reaching Produce Avenue there is but one access to the Terminal, that being through Terminal Court which juts off the Produce Avenue on ramp leading to Bayshore Freeway/101. Any excavation along Produce Avenue which would disrupt the free-flow of traffic would severely impact the ingress and egress of vehicles into the Golden Gate Produce Terminal. The delivery vehicles that we service are large 18-wheelers often in excess of 50 foot long and sometimes double trailered. These are not vehicles which can easily be rerouted through alternative city detours. To disrupt traffic into the Produce Terminal even for a day is unthinkable due to the perishable nature of the commodity, and such a delay would greatly affect the produce industry throughout the State.

CC16-2

Other operations that would be severely impacted by this alternative route construction include the Olympian Cardlock Facility which leases property from the Terminal and operates within Terminal Court. Also, Park and Fly Airport Parking and Parking Company of America, which obviously require unrestricted access and egress into their facilities in order to competitively operate as airport parking services would be severely impacted.

Other concerns affecting this particular parcel relative to development include the fact that the soils along the Produce Avenue, Terminal Court and Shaw Road are low lying and of extremely poor quality. We have had continuing problems at the Golden Gate Produce Terminal Relative to subsidence of foundations as the whole area was developed over bay mud and is constantly settling and shifting. Additionally, as the land is so close to sea level, the storm drains in the Produce Avenue / Terminal Court area are insufficient and constantly flood in times of inclement weather and high tide influences.

CC16-3

Additionally, the southern boundary of the Golden Gate Produce Terminal parcel abuts a navigable slough which is under the jurisdiction of the Bay Conservation and Development Commission. I have been advised by their representatives that various species of pickle grass as well as other endangered flora and fauna utilize this habitat, and any development of this area would be vigorously opposed by Bay Conservation and Development Commission.

CC16-4

Comment Set CC16, cont.

Billie Blanchard, CPUC
September 18, 2003
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I have reviewed the letter from the City of South San Francisco addressed to you dated September 10, 2003. I would like to take this opportunity to join with the City of South San Francisco in its opposition to the "Environmentally Superior Alternative" route for all of the reasons set forth therein and, along with the City, urge you in closely studying the route proposed along the Railroad right of ways that run through the City of South San Francisco. It is obvious and apparent that following the Railroad right of way would minimize environmental impacts and disruption to businesses and private property owners in this area.

Finally, on behalf of my client, Golden Gate Produce Terminal, I greatly appreciate the opportunity to submit these comments to you on the Proposed Jefferson-Martin DEIR and I look forward to continue to follow the progress of PG&E and the California Public Utility Commission in investigating alternative routes which will not impact the South San Francisco business community as severely as the proposed "Environmentally Superior Alternative".

Very truly yours,

ROSS, HACKETT, DOWLING, VALENCIA &
WALTI, A Professional Corporation


Michael J. Valencia

cc: Pedro Gonzales, Mayor, South San Francisco
Tom Sparks, Chief Planner, South San Francisco
Primo Repetto, Manager, GGPT
Greg Cochran, Executive Director, South San Francisco Chamber of Commerce

CC16-5

Responses to Comment Set CC16 – Ross, Hackett, Dowling, Valencia & Walti (Golden Gate Produce Terminal)

CC16-1 The commenter's concerns about the Modified Underground Alternative are noted. As a result of comments on the Draft EIR and additional analysis included in this Final EIR, the conclusion of the Final EIR is that the Proposed Project and the Modified Underground Existing Alternative are both found to be environmentally superior.

Regarding comments about notification, please see General Response GR-4. In addition to the mailed notice, newspaper notices were published in the project area and information was placed on the project website.

CC16-2 Please refer to Appendix 1, Section 4.3.4 of this Final EIR, which has been modified to add descriptions of six Route Options to the Modified Underground Alternative, especially Route Option A, which would avoid impacts to the Produce Terminal. Also, please see Response to Comment CC9-1 regarding mitigation measures that would reduce disruption to businesses.

CC16-3 Please see Response to Comment H-3 regarding soil conditions in the vicinity of Shaw Road, Terminal Court, and Produce Avenue.

CC16-4 Please see Response to Comment H-16 for the discussion of the Bay Conservation and Development Commission jurisdiction.

CC16-5 The commenter's opposition to the Modified Underground Alternative and recommendation for use of the railroad ROW are noted. Note that this Final EIR concludes that both the Proposed Project's underground segment and the Modified Underground Alternative are environmentally superior to the other northern segment alternatives. Please see Responses to Comment Set J regarding use of the railroad ROW.