

Comment Set PG, Attachment A, cont.

LAND USE

1.11 Assessment of the Proposed Project's Consistency/Conflicts with Policies

Pages D.2-22—D.2-30

In general, not all of the policies cited as applicable apply or are analyzed appropriately. For instance,

Page D.2-22: *"The only Colma General Plan Policy relevant to the proposed project is policy 5.02.361, which requires the undergrounding of power and other utility lines associated with all new construction projects."*

PG-212

The Colma General Plan policy is referring to distribution lines when it refers to "undergrounding of power and other utility lines associated with all new construction projects," not transmission lines. "New construction" in these policies is usually referring to buildings (homes and commercial buildings).

Page D.2-28, D.2.3.3 Impact L-1: *"County Vegetative, Water, Fish, and Wildlife Resources policies 1.2 and 1.27 through 1.30 call for the protection of sensitive habitats, the establishment of buffer areas around such habitats, and the regulation of incompatible uses within the habitats and buffers."*

PG-213

Transmission lines are generally not considered "incompatible uses" since they disturb little habitat during installation. Furthermore, underground and overhead lines allow for the free movement of species. On Page D.2-40, the document states that "most cities and counties do not include such uses in lists of permitted, conditionally permitted, or prohibited uses, on the assumption that public utilities are a necessity of urban life in all land use categories."

Page D.2-33, top of page: *"The transition station would be inconsistent with the City's intention to redevelop this area of the City."*

PG-214

The statement provides no justification for why a landscaped transition station would be incompatible with an intent to redevelop. See also Comment 1.4 above.

2. Specific Comments

2.1 Environmental Impacts and Mitigation Measures

PG-215

D.2.4.2 Partial Underground Alternative
Environmental Impacts and Mitigation Measures, D.2-39, first paragraph
Comparison to Proposed Route Segment, page D.2-39, last paragraph

The analysis understates the land use policy impacts of the Partial Underground Alternative. The DEIR states that this alternative would "cause impacts similar to those identified for the Proposed Project, although it would not create any new impacts or warrant additional mitigation measures beyond those already identified for the Proposed Project." As detailed in Biological Resources General Comment 1, the Partial Underground Alternative would cause significant Class I impacts where trenching occurs throughout the serpentine habitat, and also in the Triangle Area along Cañada Road. The partial underground/overhead alternative requires installation of several miles of new overhead route in a previously undisturbed

Comment Set PG, Attachment A, cont.

LAND USE

corridor (along Cañada Road and West of I-280), which creates a new impact in a new utility corridor. The text should be revised to reflect this new impact.

The second to last sentence of this same paragraph: "However, there would be greater impacts to sensitive habitats located along the underground portion extending between approximately Ralston and Carolands" acknowledges that impacts are greater, but they are also distinct in type (sporadic surface disturbance and use of existing access roads under the proposed project as opposed to continuous trenching and surface disturbance of a 40-foot swath under the Partial Underground Alternative, and these should be considered "new" impacts.

Since Mitigation for Impact B-1b for the trenching alternative does not appear to be feasible, as discussed in detail in General Comment 1, Biological Resources, then this conflict with land use policies should be considered a Class I impact under L-1. The Draft EIR offers no justification for the statement in the "Comparison to Proposed Route Segment" as to why the avoidance of Edgewood Park and Pulgas Ridge Open Space, in exchange for new impacts in a new corridor with sensitive habitat along Cañada Road (including Bay checkerspot habitat) and trenching through extensive areas of serpentine habitat would reduce the conflict with land use policies protecting biological resources. It should also be noted that the existing towers are not located in Pulgas Ridge Open Space, as stated in the DEIR, but are located within the SFPUC Watershed, as determined by review of ROW maps and field review of property indicators such as fences. Intervening topography and trees shield the project from trails within Pulgas Ridge Open Space.

2.2 Partial Underground Alternative Policy Consistency

Page D.2-35, Environmental Impacts and Mitigation Measures, Second paragraph

The discussion of policy consistency fails to identify a number of conflicts for the Partial Underground Alternative (including with 4.27, Peninsula Watershed Master Plan WQ-9, WQ-11, WQ12, and WA6) that would not result from the Proposed Project. Most notably, the Partial Underground Alternative creates a new utility corridor, in direct conflict with the Master Plan policies.

Proposed revisions: Add "However, unlike the Proposed Project, this alternative would conflict with SFPUC Policy WA6 since it would create a new utility corridor, and with policies WQ9 through WQ13 through increased need for access road construction."

2.3 Modified Existing 230kV Underground ROW

Environmental Setting

Page D.2-50, 2-51

The Draft EIR states "turning north again just east of seventh, the alignment passes a residential neighborhood on the west and U.S. Highway 101 on the east, then crosses under I-380 to follow Shaw Road, lined by industrial uses. North of the Colma Creek tributary crossing, the alignment crosses a large I-Fly long-term commercial parking lot used by air travelers."

SAC/172750/431596_1.DOC

7

PG-215

PG-216

PG-217

Comment Set PG, Attachment A, cont.

LAND USE

The description omits crossing through the front entrance and parking area of an office building complex parking lot before crossing the tributary. The long-term parking lot is Park 'N Fly just north of the Colma Creek tributary. No description is provided between the Park 'N Fly and the Highway 101 crossing, where a crossing of Colma Creek will be required. A bridge on Produce Avenue crosses the channel south of Airport Boulevard. Several field visits were made by PG&E to review the segment between Shaw Road and the Highway 101 crossing and evaluate the route of the line. There is insufficient space to cross the channel at Produce Avenue; the bridge, a gas transmission line, other utilities, and the proximity of the office building congests this area. The alternative would circumnavigate through the parking/access area to Produce Avenue and Airport Boulevard.

Draft EIR states in the 4th paragraph “**after** crossing under Highway 101, the alternative route within the city of South San Francisco is primarily surrounded by industrial uses, including a PG&E substation on the west side of Gateway Boulevard.” (emphasis added)

The description is incomplete. After crossing Highway 101, land use in South San Francisco consists of mixed commercial, including office buildings, several hotels and industrial uses, including a PG&E substation on the west side of Gateway Boulevard. A development (the Cove) is proposed for the northwest corner of Gateway and Oyster Point Boulevard. The route passes adjacent to a BCDC trail running along the bay, apparently within a required emergency access road located between the BCDC bridge and the railroad ROW.

Draft EIR states in the 5th paragraph “crossing back west under 101, the alternative alignment runs along Bayshore Boulevard, which is slightly developed with mixed commercial and light industrial uses, including a small neighborhood commercial center.”

Crossing back west under Highway 101 and the Joint Powers Board Railroad right-of-way, the alternative passes through the parking and access area (Van Waters and Rogers road) of a trucking and distribution warehouse facility to Bayshore Boulevard.

2.4 Modified Existing 230kV Underground ROW

Environmental Setting

Table D.2-16 Land Uses and Sensitive Receptors: Modified Underground Existing 230kv Collocation Alternative

This table is missing several key land uses, including:

- The Golden Gate Produce terminal near Produce Avenue
- The Marriott Courtyard and Marriott Residence Inn north of Oyster Point Boulevard, in the area indicated as east of UPRR ROW
- The Homewood Suites Hotel at Sierra Point Parkway, east of the UPRR ROW
- The Van Waters and Rogers and Cal-Rite facilities located along the Van Waters and Rogers Road

2.5 Partial Underground Alternative

Impacts and Mitigation Measures

SAC/172750/431596_1.DOC

8

PG-217

PG-218

PG-219

Comment Set PG, Attachment A, cont.

LAND USE

D.2-39, Paragraph 2, Line 1

This analysis states that the Partial Underground Alternative would conflict with tree ordinances, “though a somewhat reduced number of trees would be affected.” No basis for this conclusion is provided. In fact, by relocating the overhead portions for the Edgewood Road Segment and the West of I-280 segment into new corridors, this alternative will have a greater impact on a greater number of trees than either the proposed project on the Route Option 1B continuing term. A portion of a eucalyptus row along Cañada Road would need to be removed to accommodate the second tower of the reroute, and Towers 5 and 6 of the reroute are located in oak and madrone woodlands, necessitating removal of trees not only for tower installation but for conductor clearances in these hilly areas. Rerouting West of I-280 also opens a new corridor that crosses several wooded swales and drainages, increasing tree removal over that expected for the Proposed Project, which consists of work in an already cleared existing corridor.

PG-219

2.6 Comparison to Proposed Route Segment

D.2.4.2 Partial Underground Alternative D.2-39, last paragraph

This states that the elimination of towers from Edgewood Park and the Pulgas Ridge Preserve would result in an overall benefit in terms of County policies regarding biological resources. The line and a structure or two may need to be located in the Edgewood Park before crossing I-280. As discussed in General Comment 1, Biological Resources, the impact to biological resources from the extensive trenching through serpentine habitats is significant and not fully mitigable (Class I impact), and is a greater impact on those sensitive habitats than the temporary surface disturbance under the Proposed Project. Under those conditions, the conclusion that this alternative would result in an overall benefit to biological resources is unjustified. The elimination of existing towers provides little biological benefit, as the tower footings themselves occupy little space and the habitat between the footings is occupied by serpentine grasslands and is used by special-status invertebrates. The Draft EIR does not recommend removing and restoring the footing locations. Removing the towers would not have a net biological benefit, when considering the greater impacts of trenching over the temporary construction disturbance associated with installation of new towers, and the impacts associated with construction of the new towers along Cañada Road in the highly valuable serpentine and endangered species habitats of the “Triangle Area.” This statement is incorrect and should be deleted.

PG-220

2.7 City of San Bruno General Plan Discussion

Page D.2-20 City of San Bruno General Plan, Paragraph 2, fourth sentence

“San Bruno General Plan Action 2-1 states: Through development review, assure that development on City lands is compatible with preservation of Junipero Serra Park and San Francisco Watershed Lands in a natural state.”

Development review by the City is not applicable to utilities but is meant for buildings, and therefore does not apply to the project. Also, the city does not have jurisdiction over transmission facilities. This sentence should be deleted.

PG-221

SAC/172750/431596_1.DOC

9

Comment Set PG, Attachment A, cont.

LAND USE

2.8 City of South San Francisco General Plan

Page D.2-21, third paragraph in section, last sentence

“While the proposed alignment does not appear to conflict directly with the bikeway, construction of the underground alignment would likely create temporary disruptions in access to the [future bikeway along McLellan Drive] bikeway.”

The discussion states “construction of the underground alignment would likely create temporary disruptions in access to the bikeway.” This may not be true as the road is very wide and the location of the underground line is not determined at this time. It could be placed near the middle of the road in which case the bikeway may not be affected. In either case, provisions for bike passage will be made (as proposed by PG&E).

PG-222

2.9 Proposed Project Policy Consistency

Page D.2-27, Impact L-3: Conflict with County Visual Quality Policies, Paragraph 1

“The proposed overhead transmission line across public open space and SFPUC Peninsula Watershed would further degrade visual conditions by increasing the height of towers along the existing transmission line, thereby conflicting with visual quality policies adopted by San Mateo County. These policies are intended to protect and enhance the existing natural quality of the project area; minimize adverse visual effects of utility structures; discourage and restrict construction of structures on open and forested ridgelines; and encourage PG&E to mitigate the adverse visual effects of large transmission lines. The relevant policies include General Plan policies 4.1(a-b), 4.2 (a), 4.20, 4.21, 4.27 (a-c), 4.52 (a-b), and 4.65. As defined in section D-3, Visual Resources, the Proposed Project would create significant (Class I) impacts on several viewpoints.”

The Proposed Project does not conflict with all of the policies listed in the discussion; the discussion does not recognize the already existing transmission line corridor. Furthermore, PG&E’s proposed Route Segment 1A followed the existing tower spacing and locations as much as possible, to reduce the impacts of the new towers and keep the height of proposed towers closer to the existing condition. This effort to reduce the overall height of structures and keep the adverse impacts as much as possible to an incremental increase of an already existing condition has not been acknowledged. Furthermore, the visual mitigation measures calling for reroutes and tower removals will in many cases increase the height of proposed towers, introduce impacts to new corridors (in particular, Cañada Road between Jefferson Substation and the Pulgas Balancing Reservoir, and I-280 at Cañada Road) which has also not been acknowledged in this analysis.

PG-223

2.10 Impacts of Proposed Project, Peninsula Watershed Management Plan

Page D.2-21, Policy WQ9, Page D.2-22, Policy WQ 11, WQ 13, WA6

The analysis recognizes that the Proposed Project would not require the construction of a significant amount of new access roads, and that the proposed transmission line would be located within an existing corridor. It should be noted, however, that the implementation of the visual reroute mitigation measures would decrease that consistency, and introduce towers outside the existing corridor in several locations.

PG-224

SAC/172750/431596_1.DOC

10

Comment Set PG, Attachment A, cont.

LAND USE

2.11 Impact L-5: Interference with SFPUC Maintenance Activities

Page D.2-29, first paragraph of section

“Project plans provided by the Applicant show the placement of cable-pulling sites adjacent to tower 13/83 in a maintenance road used by the San Francisco Public Utilities Commission. The staging and use of equipment on these sites could disrupt the SFPUC’s use of its access road. In addition, support towers within the Peninsula Watershed may also interfere with the use of maintenance roads both during, and potentially after, construction of the project. Towers that could intrude into watershed maintenance roads include Towers 11/75, 12/79, 12/80, 12/81, 13/85, and possibly others.”

None of the support towers will encroach on SFPUC roadways, so potential impacts will not occur and mitigation measures should not be required for tower placement. In addition, cable pulling only lasts for a day or two and will not block access roads, so therefore should not disrupt SFPUC’s use of access roads or maintenance activities. As with current maintenance and operations practice, PG&E coordinates closely with SFPUC and will notify SFPUC of construction and operations.

PG-225

2.12 Environmental Impacts and Mitigation Measures for the Alternative Transition Station

Page D.2-36, second sentence of the section

The text states that the transition station site “may contain sensitive habitats that could be adversely affected.” It should be definitively stated whether habitat is present and will be affected or not.

PG-226

2.13 West of Skyline Transition Station Alternatives

Pages D.2-42 and D.2-43

This section of Skyline Boulevard (SR35) is access controlled, and would require a longitudinal encroachment permit from Caltrans.

PG-227

2.14 Sneath Lane Transition Station

Page D.2-45, paragraph 3

The Draft EIR does not discuss the need for Caltrans to review and approve the proposal to install cable in the Sneath Lane Bridge across I-280. PG&E has been unable to confirm a that installation of the cable in the Sneath Lane Bridge is feasible.

PG-228

3. Clarifications and Minor Comments

3.1 Jefferson Substation to Ralston Substation

Paragraphs 1 and 2., Page D.2-20

This states that the line crosses Edgewood Road into Pulgas Ridge Natural Preserve; later, the statement is made that Towers 0/6, 1/7, and 1/8 are inside the Preserve. The towers and line,

PG-229

Comment Set PG, Attachment A, cont.

LAND USE

according to preliminary mapping and PG&E field review and location of field indicators (fences, direction of runoff), actually are within SFPUC Peninsula Watershed lands adjacent to the preserve. Paragraph 2 line 5 also states that the alignment is “passing by the utility’s Pulgas Balancing Reservoir and Pulgas Water Temple.” It should be noted that the overhead line is located across Cañada Road and the nearest tower is at least 1,000 feet from the Pulgas Water Temple.

PG-229

3.2 City of San Bruno General Plan Discussion

Page D.2-20 City of San Bruno General Plan, Paragraph 2

PG-230

It is unclear why Crestmoor Canyon (at least 0.25 miles from the project) and Junipero Serra Park (at least 2 miles from the project) are discussed since they are not in close proximity to the project, and therefore not relevant.

3.3 Proposed Project Environmental Setting Description

Page D.2-1, Second paragraph, last sentence.

PG-231

The text states that the Proposed Project passes by the Pulgas Balancing Reservoir and Pulgas Water Temple when these facilities are actually about 1,000 feet away on the other side of Cañada Road.

3.4 Impact L-4a

Page D.2-50, Table D.2-17. Mitigation Monitoring Program—Land Use

PG-232

“...Notices shall provide tips on reducing noise intrusion, for example, by closing windows facing the planned construction....”

This type of obvious tip seems unnecessary. Tips can end up being confusing, speculative, and imply that impacts will be worse than actually anticipated.

Proposed Revision: Strike the fourth sentence of L-4a (provided above).

3.5 230 kV Underground Transmission Line—San Bruno Avenue Typo

Page D.2-30, D.2.3.5, Paragraph 4, First Sentence

PG-233

“Impact L-4, described above for construction of overhead project segments, would be somewhat more severe in the underground segments due to the requirement for construction of the trench and splice vaults, which would require operating concrete saws, pavement-breaking machines, jackhammers, backhoes, and other powered construction equipment that would generate noise that could disturb nearby workers.”

The text identifies potential impacts “to workers” from construction noise. The word “workers” be replaced with “residents”.

3.6 Typographic Error

Page D.2-34

PG-234

Comment Set PG, Attachment A, cont.

LAND USE

“Businesses along approximately two miles of El Camino Real would also be affected (a Class III, adverse but less than significant impact), but the noise and dust would not be as disruptive to these businesses as it would further north on the alignment, due to the wide right-of-way for the roadway and the resulting increased distance between the construction trench and the adjacent businesses.”

The second part of the first sentence is missing the word “be” between “would” and “further.”

PG-234

SAC\172750\431596_1.DOC

13

Responses to Comment Set PG – PG&E Attachment A: Land Use

PG-202 The reasons stated by the commenter for why implementation of Mitigation Measure L-7a (Provide Continuous Access to Properties) is not feasible for the PG&E Route Option 1B Alternative and other underground alternatives are not sufficient to invalidate the mitigation measure. The temporary laying of steel plates for trench crossings is a standard construction practice to maintain access to properties or streets crossed by a trench. However, it is acknowledged that there may be times during construction where worker and/or public safety could be compromised, such as during trench shoring, if work were immediately suspended on demand to lay a temporary trench. Therefore, while Mitigation Measure L-7a has been retained as a feasible and reasonable way to maintain access, the measure has been revised (see Section D.2.3.5, 230 kV Underground Transmission Line in Section D.2, Land Use of the DEIR) to allow exceptions where the stability of the trench could be threatened by laying a temporary bridge plate. However, there is no reason why dewatering or removal of contaminated soil should preclude the laying of a temporary trench, and these would not represent valid conditions for an exception to laying a trench on demand.

The CPUC also disputes that implementation of this measure would require an hour or that it would unreasonably impede the progress of construction or result in a substantial increase in construction costs. Laying of a single steel plate can provide sufficient temporary driveway access; with a plate stored adjacent to potential crossings during active construction, a plate can be laid using a backhoe in a minute or two at most. During many phases of active construction, the plate could be left in place to save this expenditure of a few minutes.

The CPUC acknowledges that the preceding discussion is applicable only to perpendicular trench crossings, and would not be valid for plating over a longitudinal section of the trench that extended for any substantial distance. The only location where the potential need for such trench plating has been identified is for a section of the Modified Existing 230 kV Alternative north of Veterans Boulevard in South San Francisco, where the alternative alignment would pass in front of the Marriott Courtyard and Marriott Residence Inn hotels. There appears to be sufficient room to construct the trench and maintain continuous access to the east of the trench. However, the Applicant has asserted that existing underground utilities present constraints that would make maintaining access infeasible. To address these concerns, a new mitigation measure (Mitigation Measure L-7c, Provide Continuous Access to Hotels) has been added to the discussion of the Modified Existing 230 kV Alternative in Section D.2.5.6 of the DEIR.

PG-203 The text referenced in the comment actually occurs on page D.2-51 of the DEIR. This is due to differences in pagination between the hard-copy document printed and distributed and the electronic version of the document available over the Internet. In the remainder of responses to comments on the Land Use section of the DEIR, where there is a discrepancy between the reference provided in the comment and printed document, the hard copy page number is provided in brackets at the beginning of the response, with no additional explanatory text. Where any page number references are included in the responses, they are references to the page numbers of the printed document.

The CPUC acknowledges that the realignment required by Mitigation Measure L-4d may not be feasible or desirable due to space and/or sensitive habitat constraints. Accordingly, the requested revisions have been made to Mitigation Measure L-4d. The construction impacts on residents that were identified for this alternative would be Class III (i.e., less than significant). Therefore, while Mitigation Measure L-4d would further reduce impacts to residences, because the impact is already Class III (less than significant), even if it proves to be infeasible, implementation of the alternative would still be permissible under CEQA without making findings for a significant unavoidable impact.

PG-204 The comment does not address the reasons or nature of the infeasibility of the underwater dam crossing. From the standpoint of mitigating impacts to biological resources on and in the vicinity of the dam, the qualified biologists who were part of the EIR team maintain that the crossing is feasible (see Responses to Comments PG-148, PG-149, and PG-150). In any event, this question of feasibility does not alter the conclusions reached in the discussion of land use impacts associated with the Route Option 1B Alternative. As noted therein, Impact L-1 (Conflict with Biological Resources Policies), a conflict with County biological resources policies, was identified for the dam crossing. The discussion states that there are options for making the dam crossing that would avoid significant impacts to biological resources, which would thereby avoid Impact L-1. These statements are still valid.

PG-205 Regarding the accuracy of the visual simulation of the proposed transition station, please see Response to Comment PG-282. As explained therein, the visual simulation presented in the DEIR accurately portrays the visual character of the transition station. While its appearance would be somewhat softened by landscaping, it would still unmistakably present an industrial appearance, and would be located on a highly visible intersection corner at the gateway to the City of San Bruno.

The comment asserts that electric substations, transition stations, and other utility infrastructure are often incorporated into residential and commercial areas. In fact, they are more typically incorporated into industrial areas, or are isolated in unobtrusive fringe areas. The proposed transition station would be located immediately adjacent to residential and commercial development, at a major entry point to the City, and in a highly visible location. It would be an aesthetically unattractive facility that would not be consistent or compatible with the surrounding land uses. While questions of aesthetics are inherently subjective in nature, it is presumed in the analysis presented in the DEIR that the vast majority of citizens would concur with the assessment that the proposed substation would be visually incompatible with the existing, approved, and planned land uses surrounding the transition station site.

With respect to the consistency of the transition station with the City's Open Space designation, this information was provided by City planning staff (City of San Bruno, 2003b).

PG-206 The issue of access to the Marriott Courtyard and Marriott Residence Inn during construction of this alternative is addressed in Response to Comment PG-202. Regarding access to the Homewood Suites SFO Airport hotel, there is sufficient right-of-way width in Shoreline Court to allow for continuous use of the roadway leading to the hotel, and implementation of Mitigation Measure L-7a (Provide Continuous Access to Properties) is feasible to maintain access to the hotel entrance.

Regarding a potential impact on the Van Waters & Rogers International and Cal-Rite facilities, the revised description of the Modified Existing 230 kV Alternative, described in

Appendix 1, Section 4.3.4, includes an optional route segment (Route Option D) that would pass east of these facilities, parallel to the UPRR railroad right-of-way. Implementation of this option would avoid the active loading docks, and therefore avoid significant impacts to these facilities.

Route Options D and F have been identified as modifications to the originally defined Modified Underground 230 kV Alternative. These options 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.

PG-207 Staff at the Midpeninsula Regional Open Space District (MROSD), which owns and maintains the Pulgas Ridge Open Space Preserve, assert that the existing PG&E transmission line does indeed pass through the preserve and that PG&E holds an easement for the corridor across the MROSD property.¹ A copy of an insurance policy for the Pulgas Ridge Open Space Preserve provided by the Real Property Department at MROSD lists easements held over the property, including a 50-foot-wide electric transmission line easement crossing Parcels A and B and held by PG&E. This easement was established in a Final Order of Condemnation issued out of the Superior Court of the State of California in and for the County of San Mateo, Case No. 63486, entitled “Pacific Gas and Electric Company, Plaintiff, vs. City and County of San Francisco,” recorded on September 30, 1954.² Furthermore, Nextel of California, Inc. currently has an application pending before the MROSD for approval of a Site Lease and Agreement entailing placement of wireless antennas on the existing PG&E transmission tower (Tower 0/6) and construction of an adjacent underground equipment vault. The application and staff report for this application indicate that the PG&E tower is located at the southwest corner of the Pulgas Ridge Open Space Preserve.³ It should be noted that Figure B-3a of the DEIR appears to incorrectly depict the Watershed Property Boundary.

With respect to the assessment of biological impacts associated with the Partial Underground Alternative, please see Responses to Comments PG-144 to PG-147.

PG-208 Application of the standards of significance set forth in Section D.2.3.1 to the land use impact analysis did not rely on a specific or readily quantifiable definition of “long-term disturbances.” The consideration of duration of an impact would be situation-specific and impact-specific. In general, long-term disturbances were considered in this analysis to be those, which would extend beyond the construction period or beyond a reasonable period for effective implementation of an appropriate mitigation measure, or beyond a suitable “recovery” period. For example, if crop production in an agricultural field were disrupted for one season, this would not be considered a long-term disturbance, provided normal production was feasible the following year or growing season. As another example, if construction activities precluded use of a parking lot for three months, this would not be a long-term

¹ Doug Vu, Open Space Planner, Midpeninsula Regional Open Space District, personal communication, September 19, 2003.

² Title of Ownership Policy, Policy No. SM-292047, for Midpeninsula Regional Open Space District, Insured, Issued June 10, 1983.

³ John P. Dickey, Real Property Specialist, Midpeninsula Regional Open Space District, Staff Report R-03-88, September 24, 2003.

disruption. However, if something were constructed on the parking lot, which precluded use of the property as a parking lot for 5 years (e.g., an interim fairgrounds), this would be considered a long-term disruption.

Short-term construction impacts were generally treated as Class III impacts in Section D.2. An exception to this was the potential displacement of residents from their homes during construction as a result of helicopter use. One's home is considered the final place of refuge, and displacement from the place one sleeps, eats, and communes with the family is an extreme effect of a construction project on innocent bystanders. For this reason, this displacement, though only temporary, was deemed to be a Class II impact in this analysis. It is the CPUC's position that it is important to ensure compensation, via the identification of a significant impact and the requirement for mitigation, to residents so affected.

PG-209 The significance criterion pertaining to sensitive receptors is primarily focused on noise, vibration, and air quality impacts, as these populations tend to be more sensitive to such effects than the general population. However, were other types of adverse effects on sensitive receptors to be identified, such as interference with normal activities, such effects would also be considered in the impact analysis. With respect to the Proposed Project, impacts identified to sensitive receptors were limited to noise and air quality impacts.

PG-210 In the event PG&E is unable to negotiate a temporary construction easement for helicopter work with a particular home owner, PG&E may need to resort to the exercise of its power of eminent domain. This possibility does not alter the conclusions reached in Impact L-4, negate the validity of Mitigation Measure L-4c, or otherwise pertain to the adequacy of the DEIR.

PG-211 While economic or social effects of a project are not to be treated as significant impacts under CEQA, the *CEQA Guidelines* do provide for economic or social effects of a project to be used to determine the significance of physical changes caused by the project (§15131(b)). The Guidelines further provide for economic, social, and housing factors to be considered by public agencies, together with technological and environmental factors, in deciding whether changes in a project are feasible to reduce or avoid the identified significant effect(s) on the environment (§15131(c)). In the case of Impact L-8, a physical impact, i.e., temporary displacement of parking facilities, would occur during construction of the Proposed Project, with the loss of revenue to the lot owner being the secondary effect related to the physical impact.

The identified mitigation measure for Impact L-8 is appropriate because it is directly tied to the secondary economic impact, which would be the most tangible component of the impact to the entity (i.e., the lot owner) adversely affected. CEQA requires a mitigation measure to be "roughly proportional" to the impact(s) of the project (*CEQA Guidelines* §15126.4(a)(4)(B)). Mitigation Measure L-8a clearly meets this test, as the compensation required would be directly tied to the economic loss that would be incurred by the property owner as a result of the project construction impact. The Guidelines also require an essential nexus between a mitigation measure and a legitimate government interest (§15126.4(a)(4)(A)). Mitigation Measure L-8a is consistent with this requirement in that it is a generally recognized government interest to protect the welfare of the people it governs, and which Mitigation Measure L-8a achieves.

- PG-212 It is acknowledged that Policy 5.02.361 addresses lower-voltage local power supply lines, and it is unlikely the Town of Colma intended it to apply to a high-voltage regional project such as the Proposed Project. This policy was cited to demonstrate the lack of Colma policies applicable to the project. This is the only policy with any nexus to the project whatsoever. When interpreted in strictly literal terms, it does bear on the Proposed Project. The salient point here is that whether or not the policy formulation was intended to address a project such as the Proposed Project, the project would in any case be consistent with the policy.
- PG-213 Any use or activity that destroys sensitive habitat would have to be considered incompatible with that habitat under any reasonable interpretation of “incompatible.” It is true that wildlife can move under or over, respectively, an overhead or underground transmission line. However, where the sensitive habitat consists of protected plant species, such species may be destroyed by construction of an overhead or underground transmission line. An activity that precludes the existence of another use would certainly constitute an “incompatible use” addressed by the referenced San Mateo County policies. The fact that transmission lines are not typically prohibited from specific land use categories does not negate the Proposed Project’s potential conflict with the County policies addressed in Impact L-1.
- PG-214 Please see Response to Comment PG-205.
- PG-215 The trenching through serpentine habitat associated with the Partial Underground Alternative was one of the bases for the statements that (a) there would be greater impacts to sensitive habitat located along the underground portion extending approximately between Ralston and Carolands Substations, and (b) on balance Impact L-1 would be more severe under this alternative than under the Proposed Project. The sensitive habitat along Cañada Road was also taken into consideration in arriving at the second summary conclusion. However, this does not represent a new land use impact. The impact—a conflict with adopted San Mateo County biological resources policies—is still entirely applicable and becomes a matter of degree, as stated in the analysis presented in Section D.2.4.2 of the DEIR. Because the mitigation recommended for Impact L-1 would be scaled to the degree of impact (i.e., the amount of habitat harmed or destroyed), it would be equally effective if the impact were to occur under the alternative or the Proposed Project.
- With respect to the assertion that implementation of Mitigation Measure B-1b (Provide Restoration/Compensation for Vegetation Losses) is infeasible, please see Response to Comment PG-144. As documented therein, the revised Mitigation Measure B-1b would feasibly mitigate the impact from trenching in serpentine habitat, and would therefore be adequate mitigation for Impact L-1 (Conflict Biological Resources Policies).
- PG-216 SFPUC Policy WA6 states, “Restrict new utility lines proposed on the watershed for the transmission of or communications to [*sic*] existing utility corridors, and require that new power lines be buried, where feasible. All proposed alignments shall undergo a scenic impact analysis.” While the Partial Underground Alternative would result in the creation of a new utility corridor along a segment of the alignment within the Watershed Lands, it is important to note that this alternative was developed specifically to reduce or eliminate impacts associated with the Proposed Project. Furthermore, the new utility corridor

segments would not be developed *in addition* to the existing utility corridor, but rather to *replace* a portion of the existing corridor with a less sensitive corridor.

The clear intent of Policy WA6 is to preserve and protect the natural characteristics of the Watershed Lands to the greatest extent feasible. The Partial Underground Alternative would be consistent with this intent by improving on existing conditions through the reduction of the existing visual impact in the Watershed Lands as viewed from publicly accessible vantage points.

The second sentence of Policy WA6 implies that new utility corridors are not strictly prohibited, though they are clearly discouraged, through the requirement that proposed new alignments must undergo a scenic impact analysis. Though the word “new” is not explicitly included in the policy statement, it is certainly implied, because an existing utility corridor would not constitute a “proposed alignment.” The alternative alignment is consistent with this second provision because a detailed visual impact analysis, focusing on scenic views, is provided in the DEIR in Section D.3 (Visual Resources).

With regard to the provision that new power lines must be buried, *where feasible*, please see Response to Comment N-6.

Regarding Policies WQ9 through WQ13, the Partial Underground Alternative would not conflict with these policies. Policies WQ9, WQ10, and WQ13 apply to the construction of new roads and trails; since no new access roads would be required under this alternative, they are not applicable to the alternative.

Policy WQ11 states, “Minimize and where possible restrict the construction of new roads or access easements through watershed lands to serve new development not in SFPUC ownership to areas of low vulnerability.” Whether or not the realignment of part of the existing transmission line corridor would be considered a new access easement is open to interpretation. If one grants that it would be, and that Policy WQ11 would therefore apply to the Partial Underground Alternative, the alternative would not conflict with the policy. The alternative restricts the creation of a new easement corridor to the minimum needed to substantially reduce the visual impacts of the Proposed Project, which would have the added benefit of substantially improving the existing visual conditions by eliminating the existing transmission line and towers between Towers 9/6 and 11/71. The realignment was carefully selected to be an area of low vulnerability with respect to biological resources, water quality, and aesthetic impacts. The alternative corridor, a selected segment to reduce impacts of the Proposed Project alignment in the preserve and park, both minimizes the new corridor and restricts it to areas of low vulnerability (i.e., adjacent to Cañada Road). The Partial Underground Alternative is therefore consistent with Policy WQ11.

Policy WQ12 is similar to Policy WQ11. It states, “Minimize and where possible restrict new easements and rights-of-way through the watershed land to areas of low vulnerability. Allow only existing uses, those within existing alignments, or those which do not pose a threat to water quality.” This policy is clearly applicable to the Partial Underground Alternative, which entails the creation of new right-of-way. The alternative’s consistency with the first sentence of the policy was explained in the preceding paragraph. The alternative is consistent with the second sentence of the policy on two counts: it entails an existing use and it would not pose a threat to water quality. Given that consistency with only one of the provisions is required, as denoted by the *or* separating them, the alternative

would clearly be consistent with the second sentence of Policy WQ12, and hence with the entire policy.

PG-217 Given the many miles traversed by a multitude of alternative alignments evaluated in the DEIR, it wasn't feasible to provide a detailed, building-by-building account of all of the land uses surrounding the alternative alignments. An attempt was made to accurately characterize the types of land uses involved, and to be more specific as warranted by potential impacts. In that regard, it is acknowledged that it would have been reasonable to identify the office building just south of the Colma Creek tributary in the description of the Modified Existing 230 kV Underground Alternative on Page D.2-50 of the Draft EIR because it would be one of the businesses affected by construction of the alternative. Nonetheless, this building is included in Impacts L-4 and L-7, related to construction impacts on residences and businesses, identified for this alternative.

North of the Park 'N Fly lot and south of the Highway 101 crossing, this alternative would be located within Produce Avenue, which is flanked on the east by Highway 101 and on the west by a large parking lot and several office or commercial buildings. These uses on the west could be affected by construction noise and dust and temporary disruptions to access, addressed by Impacts L-4 and L-7 and their associated mitigation measures, as noted in the impact discussion for the alternative in Section D.2.5.6.

The description of adjacent land uses after the Highway 101 crossing stated that the alternative was *primarily* (but not entirely) surrounded by industrial uses. The point is taken that the land uses in this area are more mixed than this characterization would indicate. Accordingly, the text on Page D.2-50 (Section D.2.5.6) of the Draft EIR has been modified to reflect this.

Regarding the comment that there is insufficient space to cross Colma Creek at Produce Avenue, there would certainly be space constraints on locating a bore pit on the south side of the creek. While it would be technically feasible to make this crossing, it could result in substantial disruptions to traffic and adjacent businesses. This constraint would be avoided by implementation of Route Option A to the Modified Existing 230 kV Underground Alternative, developed in response to comments received on the DEIR and described in more detail in revised Section 4.3.4 of Appendix 1.

PG-218 Table D.2-16 in Section D.2.5.6 has been revised to include the uses listed in the comment.

PG-219 The statement on Page D.2-39 of the Draft EIR referenced in the comment actually states that "a somewhat reduced number of trees *could* be affected" [emphasis added]. The basis for this conclusion was a review of aerial photographs of the two alignments and the fact that there would be a reduction in the number of towers under the Partial Underground Alternative. The focus of the analysis in Section D.2.4.2 specifically, and in Section D.2 generally was on land use and policy conflicts, not on impacts to biological resources, which were addressed in detail in Section D.4 (Biological Resources) by qualified experts. The analysis on Page D.2-39 correctly notes that Impact L-2, conflicts with County tree ordinances, would occur under this alternative. The commenter's point that this alternative could impact more trees than the Proposed Project is noted and not disputed, but does not alter the conclusion that Impact L-2 would apply to the Partial Underground Alternative.

PG-220 As discussed in Section 4.2.3 of Appendix 1 of the Draft EIR and shown on Figure Ap.1-3a, the Partial Underground Alternative was developed in part in response to concerns about biological impacts in and around Edgewood County Park and Natural Preserve; all support towers for this alternative would be located outside of both Edgewood County Park and Natural Preserve and Pulgas Ridge Open Space Preserve. With respect to impacts on biological resources in The Triangle, please refer to Response to Comment PG-20 and PG-144.

PG-221 While the regulations of the City of San Bruno and other local jurisdictions in the project area are not legally binding over the Proposed Project, in accordance with its General Order No. 131-D, the CPUC will consider compliance with local regulations as part of the CEQA process, and will encourage PG&E's compliance with local regulations to the extent feasible. Therefore, both the legally binding federal and State regulations and the non-binding local regulations have been discussed in Section D.2 of the DEIR, and the statement reference in the comment will remain intact. The CPUC will consider the consistency of the Proposed Project with local plans and policies during review of this EIR and prior to making a decision on whether or not to approve the Proposed Project or one of its alternatives.

Section 12.24.115 of the San Bruno Municipal Code defines "development" as "the uses to which the land which is the subject of a map shall be put, the buildings to be constructed on it, and all alterations of the land and construction incident thereto." Construction of an underground transmission line could reasonably be interpreted to fall within this definition of development. In any event, CEQA provides for a consistency review of Plans and the DEIR indicates that the Proposed Project would be consistent with San Bruno General Plan Action 2-1.

PG-222 The statement referenced in the comment notes that the proposed alignment does not appear to conflict directly with the bikeway. A potential disruption in access to the bikeway was identified because the alignment would at least entail a crossing of the bikeway, which would clearly create a temporary disruption in access, at a minimum.

PG-223 The analysis presented throughout the DEIR acknowledges and takes into consideration the presence of the existing transmission line corridor. The severity of visual impacts from the Proposed Project, for example, would clearly be substantially greater if an existing, though smaller, transmission line was not located in the same corridor. However, the presence of the existing towers does not negate the fact that larger, taller towers would be constructed in many tower locations, and these larger, taller towers would create new or increased visual impacts that would render them inconsistent with the San Mateo County visual quality policies referenced in Impact L-3.

The comment asserts that the Proposed Project does not conflict with all of the policies listed in the discussion of Impact L-3, but does not identify specific policies that do not apply, nor supply a rationale for why they don't apply. The policies were reviewed again in response to this comment; the CPUC concludes that the Proposed Project would in fact conflict with each of the County policies identified by the impact in Section D.2.3.3 of the Draft EIR.

Regarding the visual impacts of reroutes and tower removals recommended in the Visual Resources mitigation measures, the relevant mitigation measures do acknowledge that they

would result in increased tower heights, and establish limits on the height increases to avoid new significant impacts. This issue does not pertain to or alter the policy conflicts addressed in Impact L-3. For further discussion on the adequacy of the Visual Resources mitigation measures, see Responses to Comments PG-284, and PG-288 to PG-309.

- PG-224 Implementation of the recommended visual mitigation measures for the Proposed Project would not require construction of new access roads. Please see Responses to Comments N-6 and PG-216 for a discussion on the consistency of the Partial Underground Alternative with *Peninsula Watershed Management Plan* policies. Because the visual mitigation measures for the Proposed Project would not require construction of new access roads, those discussions are also applicable to the mitigation measures for the project.
- PG-225 The analysis presented in Impact L-5 in Section D.2.3.3 of the DEIR, Interference with SFPUC Maintenance Activities, was based on project maps and other information provided by the project applicant. Aerial photos provided by PG&E that include the locations of the Proposed Project towers clearly show that the towers cited in the Impact L-5 discussion would be placed on or in close proximity to SFPUC maintenance roads. If in fact the identified conflicts would not occur, this potential impact would be avoided, along with the need to implement Mitigation Measure L-5a, requiring coordination with the SFPUC. It is encouraging to note that PG&E routinely coordinates with the SFPUC, and indicates that implementation of Mitigation Measure L-5a, if required, would not impose a substantial burden on PG&E.
- PG-226 The West of Skyline Transition Station is located near possible San Francisco garter snake habitat and burrows on and near the site could be used by hibernating garter snakes. The referenced text on Page D.2-40 of the DEIR Land Use Section has been revised to reflect this.
- Regarding the potential biological impacts of this transition station site, please refer to Section D.4.5.1 in the Draft EIR. With the implementation of mitigation measures for Impacts B-1 through B-8, including Mitigation Measure B-1k, which requires use of a transition tower rather than the larger footprint transition station, these impacts would be reduced to less than significant.
- PG-227 The specific reference to Skyline Boulevard (SR 35) is not clear from the comment. However, it is acknowledged that this is a State highway, and any encroachment into the right-of-way would require an encroachment permit from Caltrans.
- PG-228 Once a project route is selected, PG&E would be required to work with the appropriate jurisdictions on the final design of the project that would be built within public road ROWs through each jurisdiction's permit process. If the Sneath Lane Alternative is selected, it is anticipated that through consultation with Caltrans and San Bruno, a bored crossing under I-280 would be required rather than installing it over the Sneath Lane bridge, as is discussed in Section 4.3.1 in Appendix 1.
- PG-229 Regarding the location of towers in the Pulgas Ridge Natural Preserve, see Response to Comment PG-207. Regarding the reference to the Pulgas Balancing Reservoir and the Pulgas Water Temple, as noted, the discussion states that the alignment "passes by" these two utilities, not that it "passes immediately adjacent to" them or is situated on top of them. According to scaled aerial photos provided by the Applicant, Tower 2/15 would be located just over 200 feet from the Pulgas Balancing Reservoir, and the transmission line would

pass even closer. The Pulgas Water Temple, located on the opposite side of Cañada Road, is necessarily further away, and is located about 800 feet from the alignment. The discussion on Page D.2-1 provides a general description of the land uses in the Jefferson Substation to Ralston Substation segment of the proposed alignment. Given that this portion of the alignment primarily crosses open space, it is certainly worth noting that the alignment passes by these two non-open-space land uses, which it does.

- PG-230 The proposed alignment passes immediately adjacent to (not at least 0.25 miles away) Crestmoor Canyon, as mapped by the City of San Bruno on its Parks, Recreational Facilities & Open Space Map in the San Bruno General Plan. Based on this map and scaled aerial photos of the project alignment, the Proposed Project would pass less than 1,300 feet from Junipero Serra County Park. This is mentioned in Section D.2.2.2 (Local Regulations) on Pages D.2-23 and D.2-24 of the DEIR both because it is a significant land use in proximity to the Proposed Project, and because of the potential for the project to conflict with San Bruno General Plan Action 2-1, which requires new development to be compatible with the preservation of Junipero Serra Park in a natural state. As noted in the DEIR, the analysis did not identify a project conflict with this policy.
- PG-231 Please see Response to Comment PG-229.
- PG-232 Construction of the Proposed Project would adversely affect residents living in proximity to support towers or the underground alignment, as noted in the DEIR. Among the impacts they would experience are noise from operation of equipment, cutting of trenches, etc. This is not speculation, but a well-documented effect of construction activities. While recommending the closure of windows facing construction may seem like an obvious tip, it may not be to all of the residents who would be affected by construction impacts. There is nothing to be lost by including the recommendation in a notice to residents. The CPUC disputes that inclusion of this tip implies noise impacts would be worse than they actually would be. Elevated noise levels would certainly occur during construction, and closing a window is a simple and effective way of reducing interior noise levels.
- PG-233 The “workers” referred to in the discussion in Section D.2.3.5 of the DEIR are workers in adjacent offices and commercial businesses. It is acknowledged that such disturbances could also occur to residents. The text on Page D.2-33 has been revised to include residents in the discussion.
- PG-234 The requested change to the text has been made on to Page D.2-37 of the DEIR under Section D.2.4.1.

Comment Set PG, Attachment A, cont.

Public Health And Safety

1. General Comments

1.1 Public Health and Safety (Criteria for determining the risk posed by hazardous materials during project construction.)

DEIR Sections D.8.1, D.8.4, and D.8.5

Throughout Section D.8, it appears that the sole criteria for evaluating the risk of encountering hazardous substances during project construction is the number of sites listed on the Environmental Data Resources Area/Corridor environmental database study (EDR Study). Although the site density is one factor in determining risk, several other factors can be equally, or more, important. As noted in the PEA, page 11-4, the risk posed to the project is also contingent on type of contamination, type of release and media affected, and intervening action. The distance from the site to the Project will also have an impact on the risk, particularly for sites where soil or waste is the contaminated media.

Proposed revisions: All factors affecting the risk posed by encountering contaminated material should be addressed when describing the environmental setting and comparing alternatives. For example, sites for which remedial action has been completed are likely to pose less risk than non-remediated sites. Sites with hazardous waste, such as are found along the Modified Existing 230Kv Alternative ROW, pose a greater risk than sites contaminated with motor oil or typical leaking underground storage tanks (LUST) sites. Sites through which the Project alignment passes directly will likely pose a greater risk than sites 0.25-miles away, particularly for contaminated soils.

1.2 Proposed Mitigation Measure HAZ-2a

DEIR page D.8-11

“Proposed Mitigation Measure HAZ-2a requires that “soil sampling and laboratory testing shall be performed at all locations along the project route, transition station site, and at substations were (sic) known contaminated sites are within 0.25 miles of the alignment.”

This measure is overly restrictive. A number of factors should be considered when evaluating the risk posed to the project by a contaminated site. These factors include type, extent, and concentrations of contamination, type of release and media affected, intervening action, and distance from the site. Proposed Mitigation Measure HAZ-2a neglects to take most of these factors into consideration.

Proposed revisions: The second and third sentences of Proposed Mitigation Measure HAZ-2a should be replaced with the following: “The Phase II shall include a review of contaminated sites listed on the EDR Study, as well as a field investigation. The review of the sites listed on the EDR Study will include (as available) type, extent and concentrations of contamination, type of release and media affected, intervening action, and distance from the site. The scope of

PG-235

PG-236

Comment Set PG, Attachment A, cont.

PUBLIC HEALTH AND SAFETY

the Phase II field investigation will include collection of soil and groundwater samples for laboratory analysis and quantification of contaminant levels within the proposed excavation areas of the project. The scope of the filed investigation will be developed based on an assessment of each listed contamination site and will be in accordance with the standard of practice for assessment of appropriate worker protection and material handling procedures.”

PG-236

1.3 Proposed Mitigation Measure HAZ-3a: Contaminated Groundwater or Soils

DEIR page D.8-11

Proposed Mitigation Measure HAZ-3a requires that the SFPUC, CPUC, and the RWQCB be provided with the results of the Phase II field investigation. It also requires that in the event that contaminated groundwater or soils are encountered, the proposed extraction and disposal plans be submitted for approval to these same agencies prior to further construction in the area. PG&E is willing to submit the results of our field investigation to the SFPUC, CPUC, and the RWQCB (at their request). In addition, as required by regulation, the contractor will notify the RWQCB if groundwater with hazardous levels of contaminants is encountered. However, waiting on approval of dewatering, excavation, and material disposal plans from these agencies could result in significant adverse impacts to the Project’s schedule and budget. Additionally, these plans are not within the RWQCB’s authority. APM 11.4 indicates that hazardous materials will be “handled, transported, and disposed of in accordance with Federal, State, and local regulations.” This mitigation measure is sufficient to reduce the potential impacts to less than significant levels.

PG-237

Proposed revisions: The Proposed Mitigation Measure HAZ-3a should be deleted.

1.4 Proposed Mitigation Measure HAZ-3b: Observe Exposed Soil

DEIR page D.8-12

Proposed Mitigation Measure HAZ-3b is an extension of APM 11.4, which already requires that the contractor 1) stop work until the material is properly characterized and precautions are taken to protect human health and the environment and 2) comply with Federal, State, and local regulations for material handling, transportation, and disposal. It clarifies that “the contractor shall observe exposed soil for visual evidence of contamination.” In addition, it requires that the contractor immediately notify the CPUC’s Environmental Monitor when evidence of contamination is noted. It also requires the contractor to provide a weekly report listing encounters with contaminated and describing actions taken to the CPUC. This is inconsistent with Proposed Mitigation Measure HAZ-3a, which requires CPUC approval of proposed actions (extraction and disposal) prior to further construction. In addition, it is not clear that a CPUC Environmental Monitor will be available at all times throughout the project for immediate notification.

PG-238

Proposed revisions: The Proposed Mitigation Measure HAZ-3b should be revised as follows: “During trenching, grading, or excavation work for the project, the contractor shall observe exposed soil for visual evidence of contamination. In the event that evidence of previously unidentified potential contamination is observed, the contractor shall document the location of the contamination and shall notify the CPUC’s Environmental Monitor within

Comment Set PG, Attachment A, cont.

PUBLIC HEALTH AND SAFETY

48 hours. A weekly report listing encounters with previously unidentified contamination and describing actions taken shall be submitted to the CPUC.”

PG-238

1.5 Proposed Mitigation Measure HAZ-2a: Conduct Phase II Investigation

DEIR page D.8-11; Table D.8-17, page D.8-49

PG-239

Proposed Mitigation Measure HAZ-2a requires that the results of the Phase II investigation be reviewed and approved by DTSC or San Mateo County’s Environmental Health Division prior to the start of construction. This requirement is not appropriate for the Project. These agencies typically do not review or approve investigation reports unless they are the lead agency for a listed site at which the work is performed. It is possible that the agencies will not have the time or manpower available to perform the required reviews. In addition, the purpose of the field investigation is not site characterization, but is strictly for quantification of contaminant levels within the proposed excavation areas of the project. PG&E is willing to submit the results of our field investigation to DTSC or San Mateo County’s Environmental Health Division upon their request, but requiring approval of agencies that do not normally approve these studies should not be required.

Proposed revisions: The requirement that the results of the field investigation be reviewed and approved by DTSC and San Mateo County’s Environmental Health Division should be deleted.

1.6 Impact HAZ-1: Potential Hazardous Substance Spills During Construction

DEIR page D.8-10

PG-240

The description of the impact includes the following statement: *“However, implementation of Hydrology and Water Quality Mitigation Measure H-2a (see Section D.7.3), which requires the Hazardous Substance Control and Emergency Response Plan to be approved by the CPUC and the San Francisco Public Utilities Commission (SFPUC), also is recommended to ensure that impacts would be reduced to less than significant levels (Class II).”*

It should be noted that the submittal to SFPUC will only apply where the project crosses SFPUC lands. Proposed Mitigation Measure H-2a requires that the Hazardous Substance Control and Emergency Response Plan be approved by the SFPUC and that verification of the SFPUC approval be forwarded to the CPUC. Again, this should clearly state that this submittal to SFPUC will only occur where the line is located on SFPUC land.

Proposed revisions: The description of Proposed Mitigation Measure H-2a in Impact Haz-1 should be corrected to state that the HSC&ERP will be submitted where applicable, to the SFPUC, and verification of SFPUC approval will be forwarded to the CPUC.

SAC/172750/431621_1.DOC

3

Comment Set PG, Attachment A, cont.

PUBLIC HEALTH AND SAFETY

1.7 D.8.3.4 Transition Station

Page D.8-12, paragraph 2

Proposed Mitigation Measure H-2a is not applicable to sites outside the jurisdiction of SFPUC.

PG-241

2. Specific Comments

2.1 Modified Existing 230 kV Underground ROW

DEIR page D.8-28

As noted in General Comment 1, the discussion of the environmental setting should include all factors affecting the risk posed by encountering contaminated material. This is particularly true for the Modified Existing 230 kV Underground alignment, as several "severely contaminated sites" exist along this alternative. The proposed Modified Existing 230 kV Underground alignment runs through three of these sites, which are not identified in the text. A description of each site, and the associated issues, is included below (more info being collected):

PG-242

A. Sierra Point Landfill (EDR Map ID 22, 23)

Sierra Point Landfill was formerly a private Class III Solid Waste Landfill, and is currently being redeveloped for commercial properties. Based on available construction documents, it appears that the entire proposed alignment through Sierra Point would penetrate the existing landfill cap. Depending on the selected alignment through Sierra Point, this could involve between approximately 2000 and 3000 feet of trench. Any vaults within the Sierra Point area would also likely impact the cap and underlying refuse.

In addition, as noted in Specific Comment 1.51 microtunneling may likely be required at the inlet just south of Sierra Point Landfill. CCR Title 27 prohibits utilities from being placed in waste; therefore, direction drilling under the inlet would not be feasible due to the proximity of waste to the shoreline and the proposed alignment configuration. Based on the extent of refuse at the landfill, potential microtunnelling pits at the south end of Sierra Point would likely require excavation of cap materials and refuse.

Work requiring penetration and excavation through the landfill cap and into the waste would be considered a significant impact.

B. Gateway Site (EDR Map ID 35, 36)

For approximately 3500 feet along Gateway Boulevard, between East Grand Avenue and Oyster Point Boulevard, the alignment traverses the Gateway Site, formerly occupied by Bethlehem Steel and the Edwards Wire Rope Companies. Prior to redevelopment of the area, contaminants identified in soils at the site included acidic soils, metals (primarily lead), PCBs, and asbestos. Groundwater at the site was also found to have low pH and high metal concentrations. Remediation activities included both off-site and on-site

PG-243

Comment Set PG, Attachment A, cont.

PUBLIC HEALTH AND SAFETY

disposal of contaminated soils. The on-site disposal area, located at the northern end of the property between Gateway Boulevard and the railroad tracks, was capped with one foot of clean fill; this is the area proposed for the Modified Existing 230kV route. No information concerning cleanup levels or the extent of contaminated material remaining on site was located.

Based on soils testing conducted along the northern edge of the property for the Oyster Point Interchange project, it is likely that soils containing lead in concentrations greater than California hazardous materials limits are still present beneath the Gateway site and may be encountered in excavations performed for the transmission line. Further investigation along the proposed alignment would be necessary to determine the level and extent of contamination. Soils exceeding hazardous materials criteria for lead would require off-site disposal at Class I hazardous waste landfill. Soils with lesser amounts of lead could still require off-site disposal at a Class II facility. Groundwater has been encountered between approximately 5 and 10 feet below the ground surface at the site and may be encountered during excavation for the Project.

C. Shearwater Site (EDR Map ID 33)

The property north of Oyster Point Boulevard is known as the Shearwater Site and was formerly occupied by U.S. Steel. Contaminants identified at the site include acidic soils, lead, and hydrocarbons in soil as well as dissolved lead in groundwater. Portions of the property appear to have been developed. However, information concerning cleanup activities was not found.

Total lead concentrations in excess of 1000 mg/kg (California hazardous criteria) have been identified over much of the site, generally concentrated in the middle of the property and along the western boundary near the railroad tracks. Acidic soils have been identified primarily in the southwestern corner of the property. Soil from the southern portion of the Shearwater site was collected and tested as part of the Oyster Point Interchange project. Based on available information, it is likely that soils containing lead in concentrations greater than 1000 mg/kg will be encountered in excavations within the Shearwater site. Significant hydrocarbon contamination may be encountered as well. Groundwater at the site is shallow and may be encountered in excavations.

Proposed Revisions: The text should be revised to better reflect the conditions along the alignment. Trenching or drilling through these sites is a potentially significant impact; appropriate mitigation measures cannot be developed without additional site-specific surveys and information and possibly agency consultation. Feasibility of mitigation for work within the capped areas of these sites is not known; for this reason, this impact should be categorized as a Class II, if not Class I, since landowners and agencies may not approve placement of utilities through the properties.

2.2 D.8.5.6 Modified Existing 230 kV Underground ROW

DEIR page D.8-28

The text notes that there are 33 sites along the Modified Existing 230 kV Underground alignment, as compared to the 27 sites along the proposed alignment. However, the comparison

PG-243

PG-244

PG-245

Comment Set PG, Attachment A, cont.

PUBLIC HEALTH AND SAFETY

fails to note that soil along the BART ROW (20 of the 27 sites) has been remediated. Due to the remediation that has occurred, the BART ROW is significantly less likely to be impacted by the listed sites.

PG-245

The text notes that “while the contaminated sites along both the alignments are predominantly gasoline or motor oil fuel leaking from underground tanks, there are several severely contaminated sites along the alternative route that have been contaminated with various constituents, including petroleum products and heavy metals”. As noted Specific Comment 2.1 in addition to the heavy metals and petroleum hydrocarbons noted in the comparison, these sites include acidic soils, asbestos, waste, and PCBs. Based on the constituents and the fact that the Modified Existing 230 kV Underground alignment runs directly through these sites, Impacts HAZ-2 and HAZ-3 are potentially much greater than for the proposed alignment, and feasibility of mitigation within the time frame of the project is not known.

Construction through the three sites identified in Specific Comment 2.1 could significantly increase the Project costs, and adversely impact the project schedule. Transportation and disposal of hazardous materials could significantly increase the costs of transportation and disposal. In addition, because CCR Title 27 prohibits the placement of utilities in waste, the utility trench may need to be lined with a Title 27-compliant cover. Construction of the cover would lead to additional agency oversight (San Mateo County and the RWQCB), and could cause delays to the Project. Additionally, due to liability and other concerns, the owners of the properties, or the oversight agencies, may object to construction of the utility trench through the properties, and approvals may not be granted for the work.

2.3 Underground Segment (Environmental Setting)

Page D.8-3, paragraph 3

PG-246

As noted on page 11-2 of the PEA, trenching within the BART ROW will “generally be through uncontaminated soils placed there as a result of the BART SFO Extension soil-management policies (e.g., removal of contaminated soil and placement of clean soil along the ROW.)” The environmental setting description in the DEIR fails to note the remediation of soil along the BART ROW.

Suggested revisions: The text should be revised to accurately reflect anticipated conditions along the BART ROW.

2.4 Release of Hazardous Materials During Operation at Transition Station or Substations

DEIR page D.8-12

PG-247

Proposed Mitigation Measure HAZ-4a is intended document implementation of APM 11.1 and 11.8, as mitigation for potential operational impacts. However, the mitigation language presented is targeting construction impacts. Specifically, it does not make sense to provide a list of names of construction personnel.

Comment Set PG, Attachment A, cont.

PUBLIC HEALTH AND SAFETY

Proposed revisions: Proposed Mitigation Measure HAZ-4a should be revised to require the preparation of an Environmental Training and Monitoring Program for operations personnel. Documentation of such a program can be provided to CPUC prior to commencement of operation, not 60 days prior to the start of construction.

PG-247

3. Clarifications and Minor Comments

3.1 Environmental Impacts and Mitigation Measures of the Proposed Project— Contamination and Hazardous Material

DEIR page D.8-7, paragraph 4, sentence 1

The first sentence states “The principal environmental impacts involving hazardous waste are the excavation and handling of contaminated resulting in exposure to workers and the general public”. The handling of contaminated groundwater is also an impact.

Proposed revisions: The first sentence should be modified to include groundwater.

PG-248

3.4 Table D.8-17 Mitigation Monitoring Program – Public Health and Safety

DEIR pages D.8-14 through D.8-52

The mitigation measures in Table D.8-17 should be revised in the same manner as described for the text of the mitigation measures. In addition, the Responsible Agencies should be revised appropriately.

The monitoring activity for proposed Mitigation HAZ-2a and HAZ-3b are redundant with the monitoring activity for APM 11.4. Proposed Mitigation HAZ-2a and HAZ-3b are essentially the same as APM 11.4, but with additional detail and implementation requirements.

PG-249

SAC/172750/431621_1.DOC

7

Responses to Comment Set PG – PG&E Attachment A: Public Health and Safety

PG-235 The Environmental Data Resources (EDR) database was reviewed to identify sites that are active hazardous waste sites and in proximity to the project alignments. These sites are included in the EIR summary tables of Hazardous Waste Sites Potentially Impacting the project (Tables D.8-1 through D.8-4 and D.8-6 through D.8-12). Active sites include facilities that have known contamination, remediation in progress, and post-remediation monitoring. Brownfields and closed landfills were also included in the summary tables. The analysis relied partly on the number of contaminated sites that potentially may impact each alignment. The analysis also considered the proximity of the site based on the street address; the EDR database does not provide the size or physical limits of the contaminated site or specific details on the type and concentration of the contaminants.

Therefore, each active site within 0.25-mile of the alignment is identified in each summary table and would require further evaluation in accordance with Mitigation Measure HAZ-2a, Conduct Phase II Investigation. This mitigation measure includes review of the status of listed contaminated sites that should yield site-specific information regarding the type, concentration, and location of contaminated soil and groundwater in relation to the project. Mitigation Measure HAZ-2a has been revised to clarify the information to be gained from the review of the agency files and status of each site (see Section D.8.3.3 of the Final EIR).

Substantial additional information is presented in Section D.8.5.6 regarding the contaminated sites along or near the Modified Underground Existing Alternative. This information clearly defines this site history, status of remediation, and the location of remaining hazardous areas. Based on analysis of this information and discussion with staff at responsible agencies (DTSC, County of San Mateo, RWQCB), it is clear that construction through and around these areas would not create any risk to public health as long as required mitigation is implemented. Existing underground utilities in Gateway Boulevard, Oyster Point Boulevard, Veterans Boulevard, and the closed Sierra Point Landfill area have all been successfully installed using these mitigation requirements.

PG-236 Mitigation Measure HAZ-2a, which requires Phase II Investigations to be conducted, has been revised to clarify the information to be gained from the review of the agency files and determination of current status of each site (see Section D.8.3.3 of the Final EIR).

PG-237 Mitigation Measure Haz-3a, Contaminated Groundwater or Soils, has been modified to include the option to prepare and submit a pre-construction contingency plan related to excavation and disposal of contaminated materials. The excavation and disposal of contaminated soil or groundwater shall be approved by SFPUC and CPUC, as well as in “accordance with Federal, State, and local regulations”, as PG&E has committed to. This approval may be based on conceptual plans outlined in a contingency plan submitted prior to construction to expedite such activities during construction. The RWQCB will have jurisdiction over disposal of contaminated groundwater and discharges to bays, streams, and estuaries.

PG-238 Mitigation Measure HAZ-3b, Observe Exposed Soil, states clearly that in the event contaminated soil or groundwater is encountered, the CPUC Environmental Monitor shall be notified immediately. Although the CPUC Environmental Monitor will likely be

available for quick response, it is not necessary that the monitor responds to the notice or oversees the work immediately. There is nothing implied in HAZ-3b that the contractor must await response from the CPUC Environmental Monitor before stopping work, beginning to characterize the contamination, and taking appropriate safety measures. Mitigation Measure HAZ-3b has not been revised.

- PG-239 Excavation and removal of contaminated soil or groundwater that have migrated from nearby sites require review and approval from the lead agency responsible for the original site. DTSC has provided oversight of similar projects under the Voluntary Cleanup Program.
- PG-240 Impact HAZ-1, Potential Hazardous Substance Spills During Construction, has been modified to include reference to the fact that SFPUC review and approval is limited to only the geographic areas under its jurisdiction.
- PG-241 The Hazardous Substance Control and Emergency Response Plan requirement, as outlined in Mitigation Measure H-2a, and referenced in Impact HAZ-1, Potential Hazardous Substance Spill During Construction, is required for all jurisdictions. As discussed above in Response PG-240 (see above), SFPUC would have review and approval authority only for the lands under its jurisdiction.
- PG-242 The potential for the Sierra Point Landfill to affect construction is acknowledged by the inclusion of this site in Table D.8-12 (Items 22/23), and additional information on this site and appropriate engineering measures in the area has been added to Section D.8.5.6. Excavation of the Sierra Point Landfill cover is a potentially significant impact (Class II), mitigable to less than significant levels with implementation of Mitigation Measure HAZ-2a requiring a Phase II investigation prior to the start of construction. This construction activity and replacement of the cover will require coordination with the oversight agencies (San Mateo County Environmental Health, RWQCB, and Integrated Waste Management Board). In order to comply with CCR Title 27, it may be necessary to excavate an adequate width to create a buffer for the waste left in place. Planning for this work, including existing conditions, worker safety, lead agency, and remedial measures to restore the landfill cover or liner should be completed in accordance with Mitigation Measure HAZ-2a, Conduct Phase II Investigation, including the requirements for agency file review and determination of current status to reduce this impact to less than significant.
- PG-243 The potential presence of contaminated soil along Gateway Blvd. has been researched and is described in Section D.8.5.6, which includes a map of the various contaminated parcels (Figure D.8-A2). The information for construction contractors in this area clearly states that construction can be safely accomplished. Construction would follow site requirements and deed restrictions, as well as requirements of Mitigation Measure HAZ-2a, Conduct Phase II Investigation. The former land occupied by Bethlehem Steel and Edwards Wire and Rope companies was acquired by Homart Development Corporation (see Draft EIR Table D.8-12, sites 35 and 36, page D.8-27) in 1980 and has a history of more than 20 years of remediation of soil containing metals (Pb, Zn, Ni, and Cr), petroleum hydrocarbons and PCBs, and acidic groundwater. Remediation has included removal of surface structures and waste, removal and disposal of contaminated soil, consolidation of contaminated soil into only two areas, and construction of a soil cap. Groundwater pH returned to neutral within several months after construction of the soil cap.

- In November 2000, the Department of Toxic Substances Control (DTSC) modified the land use covenants to restrict development to commercial and industrial uses on the two areas with the contaminated soil. Selection of the final alignment and construction of the 230 kV underground duct bank in this area would be compatible with the proposed industrial and commercial uses that allows construction of buildings that minimize disturbance of the cap and contaminated soil. Selection of the Modified Existing 230 kV Underground ROW would require implementation of Mitigation Measure HAZ-2a to review the current status of the site in relation to the project alignment and to conduct a Phase II investigation (soil sampling, laboratory testing, and quantification of contaminant levels). A workplan for the Phase II investigation and the results shall be reviewed by DTSC prior to construction. It should be anticipated that the presence of heavy metals in the soil would require removal and offsite disposal of excavated materials, dust control to protect workers and nearby sensitive receptors, and restoration of the clean soil cap. The excavation and removal of soil could proceed under DTSC's Voluntary Cleanup Program (VCP) and result in additional remediation in the Oyster Point-Bay West Cove Brownfields.
- PG-244 The CPUC disagrees that the potential impact of the Chiltern Site (Shearwater Site) may be significant and unmitigable. Chiltern Development Corporation acquired the former US Steel Shearwater Project (see Draft EIR Table D.8-12, Site 33, page D.8-27). 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., Veterans Road) and is compatible with construction of underground utilities. The EIR text in Section D.8.5.6 has been modified to clearly identify the presence of these sites and the potential site conditions. The remaining contaminated portions of this parcel would be avoided with use of Route Option E, requiring installation of the transmission line within Veterans Boulevard and not through the vacant lot north of Oyster Point Boulevard.
- PG-245 EIR text in Section D.8.5.6 has been modified to reflect the presence of metal, hydrocarbons, PCBs, asbestos, acidic soils, and landfill waste in large areas at the Sierra Point Landfill, the Homart Site (along Gateway Boulevard), and the Chiltern Site (Shearwater), and that could lead to greater construction periods and agency coordination and review. However, given that there are existing underground utilities in all of these areas, the review period would not extend beyond the time normally required for coordination and permitting for other issues associated with this project.
- PG-246 The DEIR Environmental Setting Section D.8.1.5 has been revised to indicate the BART ROW was backfilled with clean soil and that these materials should be anticipated along this alignment.
- PG-247 Mitigation Measure HAZ-4a, Release of Hazardous Materials During Operations, has been revised to restrict application to operation issues at the transition station and substations, rather than construction.
- PG-248 The first sentence of EIR of Section D.8.3 Environmental Impacts and Mitigation Measures for the Proposed Project – Contamination and Hazardous Materials, has been modified to include groundwater with contaminated soil as the principal environmental impacts involving hazardous waste.

PG-249 Table D.8-17 Mitigation Monitoring Program – Public Health and Safety has been revised to be consistent with the changes in the Final EIR text.

Comment Set PG, Attachment A, cont.

Hydrology and Water Quality

1. Specific Comments

1.1 Impact H-8: Exposure of Underground Cable to Damage through Stream Scour and Erosion

DEIR page D.7-21, paragraph 3, line 3

Scour would potentially expose the duct bank, not the cable itself. This sentence states that "This impact is unlikely to occur because most streams that would be crossed are lined to prevent erosion and scour. However, at least one crossing of Colma Creek could be subject to scour." Actually, all creek crossings are in culverts or concrete channels. No impact analysis is presented that supports a conclusion that a potentially significant impact could occur at Colma Creek or any other creek. Colma Creek is a recently constructed, reinforced concrete-lined trapezoidal channel, and there is no possibility of scour through the bottom of that channel. If the conclusion is that this impact is unlikely to occur, Mitigation Measure H-8a, adjustment of the transmission line burial depths is unnecessary for the Proposed Project.

Suggested revisions: Either provide impact analysis supporting the conclusion that a potentially significant impact could occur, and specify which creeks would be subject to Mitigation Measure H-8a, or delete the text, "However, at least one crossing of Colma Creek could be subject to scour. Mitigation Measure H-8a is recommended to ensure proper burial at stream crossings. Impact H-8 would be less than significant with implementation of Mitigation Measure H-8a (Class II)" and delete Mitigation Measure H-8a for the Proposed Project.

1.2 Impact H-9: Interruption of Groundwater Flow or Modification of Groundwater Depths during Construction of Underground Transmission Line

DEIR page D.7-21, paragraph 5, line 3

The impact discussion acknowledges that the depth of the trench is typically 6-8 feet, while the depth to groundwater is generally 30 feet or more and concludes that "excavation at this depth is unlikely to adversely affect groundwater." No analysis is presented to demonstrate a potentially significant impact to groundwater hydrology and therefore there is no need for Mitigation Measure H-9a. In addition, Mitigation Measure H-9a calls for extensive pilot borings, including in areas where the well-documented known aquifer lies far below the trenching area. Locations where groundwater could be expected to occur at less than 8 feet can be identified from literature review. Furthermore, unless the groundwater basin is perched above that level, trenching through one portion of a shallow aquifer will not have any noticeable impact on the aquifer or groundwater movement.

Suggested revisions: Delete the text, "However, the acquiring of information regarding the depth and location of groundwater is not specified as part of this APM. Mitigation Measure H-9a is required, in addition to AMP 9.5, to reduce this potentially significant impact on

PG-250

PG-251

Comment Set PG, Attachment A, cont.

HYDROLOGY AND WATER QUALITY

groundwater hydrology to less than significant levels (Class II)" and delete Mitigation Measure H-9a.

PG-251

1.3 Impact H-1: Soil Erosion and Sedimentation from Construction Activity and Access Roads

DEIR page D.7-17, paragraph 2, line 2

PG-252

The discussion under Impact H-1 notes that "construction of culverts in ephemeral water course could accelerate soil erosion which would lead to sediments being washed into reservoirs and streams." The proposed project does not call for any new culvert crossings. Should final construction design require any, such as along proposed visual reroutes, these would be identified in the erosion control plan in APM 9.1 and in plans called for in the Biological Resources Section. In addition, as BMPs will be implemented as required by the SWPPP Construction Storm Water Pollution Prevention Permit and APM 9.1, then this is not a potentially significant impact.

Suggested revisions: Identify where access roads would cross drainages, if any. If no drainages would be crossed, delete "and construction of culverts in ephemeral watercourses" from paragraph 2, line 2.

1.4 Impact H-2: Degradation of Surface or Ground Water Quality through Spill of Potentially Harmful Materials Used in Construction

DEIR page D.7-18, paragraph 3

PG-253

The discussion of potential impact under H-2 should acknowledge that much of the overhead portion of the proposed route passes through hilly terrain where the depth to groundwater is significant and the potential for contamination of groundwater from a surface spill is remote.

Suggested revisions: Delete the words "or groundwater" from the title of Impact H-2 and from paragraph 3, line 2. Add the sentence "The proposed route for the overhead line passes through hilly terrain where the depth to groundwater is significant and the potential for contamination of groundwater from a surface spill is remote" to the end of paragraph 3.

1.5 PG&E Route Option 1B – Underground – Environmental Impacts and Mitigation Measures

DEIR page D.7-23, paragraph 5

PG-254

The discussion states that "Impact H-8 (stream scour exposing the underground cable) would not occur because all water crossings would occur in existing roadways and therefore they would be unlikely to be subject to scour." This statement does not support the conclusion that Mitigation Measure H-8a is needed so that impacts would be less than significant. At these creek crossings, the water would flow through a culvert and the potential for stream scour in concrete lined channels is remote. Mitigation Measure H-8a is unnecessary.

Comment Set PG, Attachment A, cont.

HYDROLOGY AND WATER QUALITY

Suggested revisions: Delete the text “Mitigation Measure H-8a should still be implemented to ensure proper burial depth at stream crossings; with this mitigation measure, Impact H-8 would be less than significant (Class II)” from paragraph 5.

PG-254

1.6 Partial Underground Alternative – Environmental Impacts and Mitigation Measures

DEIR page D.7-24, paragraph 5

This first paragraph section does not include a quantitative assessment of impacts when compared with the proposed project; therefore, it is difficult for the reader to fairly evaluate the merits of this alternative. Although effective implementation of Mitigation Measure H-1a may reduce the impacts from erosion and sedimentation to less than significant level, impacts would be greater than the proposed project’s impacts. The Partial Underground Alternative would result in a significantly greater amount of ground disturbance and excavation and a greater likelihood of crossing drainages with an underground route compared to an overhead route that would span these features. Impacts of this alternative may in fact be significantly greater than the proposed project’s impact.

PG-255

1.7 Modified Existing 230 kV Underground ROW – Environmental Impacts and Mitigation Measures

DEIR page D.7-32

The first sentence of this section states “*Construction in this segment would have the same impacts as those described for the proposed underground line, but the overall length would reduce the overall construction impacts.*” This statement appears not to take into account the issues associated with features of this route, including 10 stream crossings and use of HDDs and bores at the margins of the Bay, which has high groundwater tables and unconsolidated soils/Bay mud. These features could have potentially more risks associated with the construction techniques resulting in water quality impacts from dewatering, frac-out potential, geologic and soil stability issues. No quantitative or qualitative assessment of potential impact of this alternative to San Francisco Bay water quality is provided that allows for an adequate comparison of the potential impacts of this alternative to the proposed project’s impacts.

PG-256

The last paragraph in this section states that the Guadalupe Watershed has a designated TMDL for mercury; however, this statement is not related to a potential impact and no analysis is provided.

Suggested revisions: This section should acknowledge that this alternative has a greater potential for impacts to water quality than the Proposed Project given the combination of high groundwater near the Bay, potential frac-outs in the soft Bay muds, proximity of construction to the Bay, and, if shown to be relevant, potential presence of mercury.

SAC/172750/431597_1.DOC

3

Comment Set PG, Attachment A, cont.

HYDROLOGY AND WATER QUALITY

1.8 Impact H-4: Encroachment into a Floodplain or Watercourse by Permanent Above-Ground Project Features

DEIR page D.7-19, paragraph 2, line 3

This sentence states that “Impact H4 is likely to occur only if power poles or other permanent project features were constructed in a watercourse.” PG&E has identified structure locations for the proposed route and none are located within a watercourse or flow path, and therefore would not potentially impede flood flows. The project would not result in this impact, and the Mitigation Measure H-4a (Flood Damage Prevention) is unnecessary for the Proposed Project.

Suggested revisions: Delete Impact H-4 and Mitigation Measure H-4a.

PG-257

2. Clarifications and Minor Comments

2.1 Impact H-1: Soil Erosion and Sedimentation from Construction Activity and Access Roads

DEIR page D.7-17, paragraph 1

The discussion under Impact H-1 should acknowledge that streams encountered by the proposed route will be “spanned” by overhead transmission lines. Stream crossing implies that ground disturbance of the bed and bank of streams (e.g. open cutting).

Suggested revisions: Add “Streams along the proposed route will be spanned by the overhead transmission lines” to paragraph 1.

PG-258

2.1 Modified Existing 230 kV Underground ROW – Environmental Impacts and Mitigation Measures

DEIR page D.7-32, paragraph 4, line 6

This sentence states that “*Mitigation Measure B-1h is intended to reduce the effect of frac-out contamination*” should refer to Mitigation Measure B-11 (page D.4-77), Colma Creek Crossing – Frac-out Contingency Plan.

Suggested revisions: Change “B-1h” to “B-11.”

PG-259

Responses to Comment Set PG – PG&E Attachment A: Hydrology and Water Quality

- PG-250 Assuming all streams to be crossed by the transmission line are fully lined with concrete, scour depth would be zero and the intent of Mitigation Measure H-8a, which requires placing the cable below the depth of scour, would be satisfied by placing the cable below the lined channel bed. Should circumstances occur which would require the cable to be placed below an unlined stream, Mitigation Measure H-8a would ensure proper burial depth. The reference to Colma Creek has been removed from the text discussion of Impact H-8 in Section D.7.3.5, which refers to potential scour damage to the cable.
- PG-251 Mitigation Measure H-9a, which requires an assessment of groundwater levels, does not necessarily require extensive pilot borings. This mitigation measure has been reworded to make it clear that the required evaluation should use available information where possible, and resort to borings only where deemed necessary. See Section D.7.3.5 of the Final EIR for revisions.
- PG-252 Because the Proposed Project does not include any culvert crossings of ephemeral watercourses, reference to culverts in the second paragraph of Section D.7.3.3 has been removed.
- PG-253 It is agreed that the potential for groundwater contamination is low, but it is not nonexistent. The reference to surface and groundwater has been removed from the title of Impact H-2, which refers to water contamination through construction activities. The following has been added to the text: “The potential for groundwater contamination through surface spills is low due to the fact that the overhead portion of the route is over hilly terrain with no (or deep) groundwater below. Surface streams in other portions of the route are lined, which would impede infiltration to groundwater.” See Impact H-2 discussion for modifications.
- PG-254 The fifth paragraph of Section D.7.4.1 has been deleted from the Final EIR because implementation of Mitigation Measure H-8a would not be necessary because all water crossings would occur in existing roadways and the line would not likely be subject to scour.
- PG-255 Please refer to Response to Comment PG-21, above.
- PG-256 All impacts identified for the Modified Existing 230 kV Underground ROW are Class II, less than significant with implementation of mitigation, as described in Section D.7.5.6 (). It is agreed that the degree of impact on water resources for the alternative would be somewhat greater than that for the Proposed Project for the reasons presented in the comment. Note that Table E-7 (Section E.2.2.5) clearly states that the Proposed Project is preferred to the Modified Existing Underground Alternative in the area of hydrology and water quality.

The section “Comparison to the Proposed Project” has been reworded as follows: “In general, the impacts of this alternative are similar to those of the Proposed Project. The Modified Existing 230 kV Underground ROW alternative crosses two fewer watercourses than does the Proposed Project. However, the potential for water quality impacts is greater along this alternative because the alternative passes near the Bay, where groundwater levels are shallow. Contaminated surface water, if created by project construction, would have a

- shorter distance to travel to reach the Bay than for the Proposed Project. The alternative route would require bored crossing of three streams close to San Francisco Bay, requiring the implementation of mitigation measures required for the Proposed Project, as well as additional mitigation to minimize impacts of “frac-outs” (Mitigation Measure B-11) that is not required for the Proposed Project.”
- PG-257 Assuming no project features would be so placed as to obstruct flows, Mitigation Measure H-4a, which would require aboveground project features to be placed outside the flow path of watercourses, would be moot. Should the final project design require placement of structures in or near watercourses, the subject mitigation measure would apply.
- PG-258 The sentence: “Streams would be spanned by the overhead transmission lines.” has been added to the Impact H-1 discussion in Section D.7.3.3 to clarify that there would be no ground disturbance associated with trenching with the bed and bank of streams.
- PG-259 The references to “B-1h” have been changed to “B-11” in the third and fifth paragraphs of Section D.7.5.6 to accurately reference the Frac-out Contingency Plan mitigation measure presented in the Biological Resources Section D.6.

Comment Set PG, Attachment A, cont.

Cultural Resources

1. General Comments

1.1 Impact Evaluation and Proposed Mitigation Measures (Historic Cut-Stone Bridge)

Mitigation Measure for Impact C-3 (C-3a)

DEIR page D.5-13, paragraph 2; DEIR page D.5-14, paragraph 5

“Construction operations have the Potential to Impact Site P-41-390.”

“Prior to project construction, PG&E shall conduct test bores above the bridge to determine whether it will be possible to install the underground transmission line as planned without damaging the historic bridge. If PG&E finds insufficient fill above the bridge to successfully trench without causing damage to the bridge or bridge setting, PG&E shall consider other methods of crossing the unnamed stream channel, such as directional drilling of the watercourse. A report shall be submitted to the CPUC for review and approval at least 60 days before construction starts, documenting test boring results and providing a diagram of the proposed construction techniques.”

“Impacts to cultural resources would be potentially significant (Class II), mitigable to less than significant levels with implementation of Mitigation Measures C-1a, C-1b, C-1c, and C-3a and APM 7.2. Specific sites in the BART ROW are:

- P-41-390. Additional information is necessary regarding the intended construction method employed for crossing the unnamed creek at the stone railroad bridge. The bridge consists of two structures, one each on the eastern and western railroad grades. PG&E plans to trench over one bridge structure. Fill above the bridge structures vary in depth from three to five feet depending upon the bridge structure and location. Additional information is required regarding the specific location and depth of the trench in relationship to these structures prior to construction. Mitigation Measure C-3a would reduce potential impacts to less than significant levels.”*

As part of the mitigation for the BART SFO Extension project, the cut-stone bridge was in fact recorded, dismantled and removed, and only a small portion was reconstructed in place. Soils that capped the bridge were removed to facilitate access to the stone bridge, which was then recorded and taken apart. Only the north headwall stones were numbered, mapped, stored off-site and then reinstalled as facing over the north end of a newly built culvert that replaces the barrel or arch of the cut-stone bridge. Since none of the bridge barrel itself remains, there is no longer an existing resource that would be impacted by going over what is now a new culvert. Available photographs illustrate recent demolition and reconstruction (in-place) of the historic stone bridge. PG&E should be allowed to proceed with construction without any further stipulations relative to preservation of the historic stone bridge.

Suggested revision: Current proposed measure should be eliminated. No replacement measure is needed.

PG-260

Comment Set PG, Attachment A, cont.

CULTURAL RESOURCES

1.2 C-1c: Construction Monitoring (archeological monitoring requirement)

DEIR page D.5-33, Table D.5-9

The text requires that locations identified in Table D.5-9 have a cultural monitor. However, the proposed project consists of overhead transmission lines crossings. For underground construction, if Route Option 1B is selected, trenching will be in roads and a monitor is not likely to be needed since the trench depth will primarily be found within road fill. Towers within 100 feet of the creeks would only necessitate an archeological if native soils are excavated.

The measure also states that cultural monitoring is required for substations, switchyards, taps, and transition stations. The table does not show locations of such areas as requiring cultural monitoring. These sites are primarily existing facilities with imported gravel and fill. Implementing the CRTP and adopting a solid cultural training program as part of the APMs should take care of unanticipated discoveries, should they occur.

Suggested revisions: Add to "Archaeological monitor required during excavation of native soils during construction.... Testing will be performed to determine if native soils or fill will be affected by trenching." Similar language should be included throughout the measure. Remove implementation of Mitigation Measure C-1c from subsection D.5.3.6 Substations, Switchyards, and Taps.

PG-261

2. Specific Comments

2.1 Impact C-4: Construction Operations Have the Potential to Impact Crystal Springs Dam

DEIR page D.5-18, paragraph 3
Mitigation Measure for Impact C-4

"(C-4a) Crystal Springs Dam. PG&E shall give preference to methods of crossing Crystal Springs Dam that would avoid alterations to the structure or setting of the dam. Such construction methods could include an overhead crossing of San Mateo Creek or the installation of a sub-marine cable placed in the lakebed away from the dam. If avoidance is not feasible, PG&E shall consult with a qualified architectural historian to develop methods of attachment that do not compromise the visual setting of this significant historic structure."

PG&E is considering crossing Crystal Springs Dam by trenching (e.g., cutting a trench with concrete saws) through the top of Crystal Springs Dam. The trench would be backfilled with concrete flush with the existing dam contours. This approach would produce no permanent adverse effects on the Dam. A more appropriate mitigation measure would be to ensure that the backfilled trench is cosmetically treated to ensure it blends in with the original (old) concrete and its weathered appearance.

PG-262

SAC/172750/

2

Comment Set PG, Attachment A, cont.

CULTURAL RESOURCES

Proposed revision: Mitigation Measure C-4a should be revised to read “PG&E will cross Crystal Springs Dam by trenching (e.g., cutting a trench with concrete saws) through the top of Crystal Springs Dam. The trench will be backfilled with concrete flush with the existing dam contours. The concrete surface flush with the existing dam contours will be cosmetically textured/finished and color-tinted/toned to blend in with the original (old) concrete to mimic its weathered appearance (and is not visually intrusive).”

PG-262

2.2 C-1a: Avoidance (confine construction area)

DEIR page D.5-30, Table D.5-9

“Existing historic structures located within the project APE along underground portions of the transmission line route shall be avoided by confining all construction activities between street curb lines within 100 feet of either side of a designated historic property.”

The mitigation measure states that historic structures within the APE will be avoided by confining construction between street curb lines within 100 feet of the site. PG&E will need to determine if this is feasible in each location due to the location of existing utilities in the roadways and impacts to adjacent residents, tenants, or commercial businesses.

Suggested revisions: “...shall be avoided *whenever possible* by confining all activities...”

PG-263

2.3 Mitigation Measure for Impact C-5: C-5a Avoid Site WSA-JM-2

DEIR page D.5-28, paragraph 5

“PG&E shall consider construction methods at WSA-JM-2 that will avoid the resource. Such construction methods could include project redesign to bypass the resource, or directional horizontal drilling to pass under the resource without disturbing archaeological soils. If avoidance is not feasible, subsurface archaeological testing shall be conducted at WSA-JM-2 to define the subsurface extent and integrity of the site. Additional archival research may also be conducted as a means of corroborating the archaeological data collected. This additional data gathering phase at each site may be sufficient, on an individual basis, to consider loss of the resource during development as a less than significant impact. Some sites may prove to be inherently complex or significant such that testing alone will not be considered adequate mitigation to permit loss. In those cases, data recovery may be warranted, wherein a more comprehensive subsurface examination-based on a Research Design formulated by the principal archaeologist to address pertinent research topics shall be required. The Research Design shall be submitted by the principal archaeologist to the CPUC for approval prior to project construction.”

PG-264

WSA-JM-2 is located more than a full city block east of El Camino Real. El Camino Real is the route for PG&E’s Option 1B. We are unaware of any project alternative that involves construction east of San Antonio Avenue (south of Santa Clara Avenue). Discovery and recordation of WSA-JM-2 appears to reflect misunderstanding of the location of PG&E Underground Route Option 1B. On page D.5-28, the EIR states that “The site is located in the BART ROW near Santa Clara Avenue in San Bruno.” Since the BART ROW is located east of San Antonio Avenue, which in turn is several blocks east of El Camino Real (where Option 1B is located), it is clearly not possible for this site to be impacted by the PG&E Route proposed Option 1B.

SAC1172750

3

Comment Set PG, Attachment A, cont.

CULTURAL RESOURCES

Proposed revisions: Eliminate WSA-JM-2 from the EIR; it is outside the APE of any known PG&E or CPUC alternative.

PG-264

2.4 Analysis of PG&E Route Option 1B—All Underground segment.

DEIR page D.5-17, Environmental Impacts and Mitigation Measures, paragraphs 1 and 2

PG-265

*“Two prehistoric sites (WSA-JM1 ...)... are located within the APE for this alternative”
“Trenching and directional drilling activities associated with the construction of the PG&E Route Option 1B underground transmission line would have a very High-Probability of disturbing archaeological sediments associated with known or previously unidentified cultural deposits. Implementation of Mitigation Measures C-1a, C-1b, and C-1c, APM 7.2, and Mitigation Measure C-4a (below) will ensure that impacts are less than significant. The following sites are of most interest on this route:*

- *WSA-JM-1. Previously unrecorded prehistoric archaeological site located by WSA archaeologists during the survey of this alternative. The site is located southeast of Edgewood Drive and northeast of Canada Road. Due to the diffuse nature of the artifacts associated with this site, the portion of the overhead route from Jefferson Substation to Edgewood Road is considered to be an Archaeological High-Probability Area.”*

WSA-JM-1 is not located within the APE for PG&E Route Option 1B, since Route 1B would be constructed under the roadway. It is located within the CPUC “Partial Underground Alternative” APE (Figure C-1a by Aspen—July 2003), some 60 to 90 meters east of Canada road. WSA-JM-1 will not be affected by Route Option 1B.

Proposed revisions: Correct erroneous references to WSA-JM-1 as being within the APE for PG&E Route 1B.

3. Clarifications and Minor Comments

PG-266

3.1 Alteration of Historic Structures

D.5-9, paragraph 5, line 2

D.5.3 Environmental Impacts and Mitigation Measures for the Proposed Project

“Simply because a prehistoric site has been disturbed, or historic structures altered or removed, does not necessarily reduce the significance insofar as CRHR eligibility is concerned.”

Alteration of historic structures may not affect CRHR eligibility if the structure is eligible for reasons other than its architectural integrity. Removal of a structure almost always reduces or eliminates CRHR eligibility.

Proposed Revision: eliminate word “removed” from sentence.

3.2 Modified Existing 230 kV Underground ROW: Environmental Impacts and Mitigation Measures

DEIR page D.5-27, paragraph 3, line 3

PG-267

SAC/172750/

4

Comment Set PG, Attachment A, cont.

CULTURAL RESOURCES

DEIR page D.5-27, paragraph 4, line 3
DEIR page D.5-27, paragraph 5, line 3
DEIR page D.5-28, paragraph 1, line 5
DEIR page D.5-28, paragraph 2, line 6

PG-267

“Following are descriptions of eight of the nine sites that occur in this area (the ninth site is described below under Impact C-5)....”

The section lists Mitigation Measures C-1b, C-1c, and C-1d to reduce potential impacts to less than significant levels. There is no Mitigation Measure C-1d identified in the EIR. Please clarify or correct numbering system assuming C-1b, C-1c, and C-1d should be C-1a, C-1b, and C-1c.

Suggested revisions: Change all references in this section from C-1b, C-1c and C-1d to what is probably the correct references; that is, C-1a, C-1b, and C-1c.

SAC/172750/

5

Responses to Comment Set PG – PG&E Attachment A: Cultural Resources

- PG-260 Additional language has been added to Mitigation Measure C-3a (Evaluation of Historic Bridge) for Impact C-3 in Section D.5.3.3 in order to make a distinction between the two bridge structures (i.e., western and eastern) that occur at the particular creek crossing referenced in the comment. While the eastern span was altered during construction of the BART line, the western structure is still intact. If PG&E intends to cross the altered eastern structure, no action is necessary. However, if PG&E intends to cross the western structure, Mitigation Measure C-3a would still be required. As such, the mitigation measure has been revised, but not deleted to ensure impacts to the western structure would remain at less than significant levels.
- PG-261 Ground disturbance could potentially occur during construction of overhead lines as well as during trenching. Trenching within roadways would reduce the chances of encountering buried cultural resources. However, trench depth and fill depth will likely vary, and therefore the possibility exists of encountering native soils during trenching as was the case during several fiber optic line installation projects in the 1990's). However, Mitigation Measure C-1c (Construction Monitoring) does state that: “Monitoring shall occur in all locations specified in the mitigation monitoring table, or at the discretion of the principal archaeologist.” The project archaeologist has the authority to change the monitoring requirement if he/she decides that the trenching, or other construction is occurring entirely within non-native fill.
- Text in Section D.5.3.6 has been revised to reflect the comment that monitoring is not required for substations, switchyards, taps, and transition stations.
- PG-262 Mitigation Measure C-4a (Crystal Springs Dam) in Section D.5.4.1 (PG&E Route Option 1B – All Underground) of the DEIR has been revised to reflect the comment.
- PG-263 While PG&E may not be able to avoid every listed historic resource, the commenter’s suggested revision “shall be avoided ***whenever possible...***” is not acceptable mitigation language because it allows for too much flexibility, and does not provide mitigation in the event a resource cannot be avoided. Therefore, a requirement has been added to the text of Mitigation Measure C-1a (Avoid Environmentally Sensitive Areas) in Section D.5.3.3 of the DEIR to ensure that in the event a historic property cannot be avoided, impacts can be mitigated to less than significant levels
- PG-264 PG&E requests the removal of site WSA-JM-2 from the DEIR. The original description of the Modified Underground Alternative called for the route to pass along San Antonio Avenue adjacent to the BART ROW south of the Airport. The current alternative route begins on San Bruno Avenue, approximately 1 mile north of WSA-JM-2. Consequently, WSA-JM-2 and associated impacts and mitigation have been removed from the text in this Final EIR.
- PG-265 Section D.5.4.1 (PG&E Route Option 1B – All Underground) of the DEIR has been revised to reflect the comment that WSA-JM-1 is not listed as being in the APE of this alternative. However, WSA-JM-1 has been added to Table D.5-4 (Cultural Resources: PG&E Route Option 1B) to reflect that it is a resource along the route

- PG-266 Text in Section D.5.3 has been revised to reflect the comment. The word “removed” has been deleted from the text.
- PG-267 Text in Section D.5.5.6 (Modified Existing 230 kV Underground ROW) has been revised to reflect the comment. Reference to Mitigation Measure C-1d has been changed to APM 7.2.

Comment Set PG, Attachment A, cont.

Recreational Resources

1. General Comments

1.1 Proposed Mitigation Measure R-2a

Page D.9-18, paragraph 4

PG-268

"R-2a Avoidance of Peak Use Periods and On-Site Notification. PG&E shall not schedule construction during peak use periods, (i.e., weekends and holidays) for recreational facilities listed below. In addition, PG&E shall provide onsite notification of recreational access closures at least two weeks in advance, through the posting of signs and/or notices at all public entrances. Documentation of such notification should be submitted to CPUC."

Although PG&E acknowledges the importance of minimizing disruption to recreational activities and parks during peak use periods, this measure to avoid all construction on weekends in the vicinity of these many recreational resources is overly restrictive. There is a strong likelihood that the project would not be able to meet the mandated in-service date without the contractor's ability to work a 6-day workweek. Furthermore, many construction activities produce only minor disturbances, such as installation, repair or maintenance of ESA fencing, erosion control measures, equipment maintenance, and site preparation, among others, that need not be restricted. This measure presents an extensive list of recreational facilities where weekend and holiday work must be avoided. In most cases, the recreational facilities listed have substantial land areas and trail lengths, and would be minimally affected by what would be very localized, site specific construction work. It is not practical to delay construction in these areas should weekend (6-day workweek) or holiday work is required.

Where construction is within portions of SFPUC Watershed lands not open to the public, or sufficiently removed or screened from a resource, there is no need to restrict weekend work. For instance, the Pulgas Water Temple is listed, even though it is 1,000 feet away from the nearest tower and across Cañada Road.

As described in the PEA, restricting work on weekends will not always be feasible. With PG&E's proposed overhead alternative, or the proposed Partial Underground Alternative, helicopter use would require road and freeway crossings and therefore closures, as would pulling cable over I-280, which would be required to take place early Sunday mornings, thus requiring work within Watershed Lands and near trails at that time. There are other instances where traffic management plans required by local agencies may conflict with the weekend restriction, or where minimizing impacts to certain land uses, such as schools, is also best accomplished by weekend work.

Proposed revisions: Add "whenever possible" to the first sentence of Mitigation Measure R-2a. In addition, with the exceptions of critical activities such as activities related to freeway closures or emergencies, PG&E will avoid work on Sundays within areas listed that are accessible to the public and are not otherwise distant or screened.

Comment Set PG, Attachment A, cont.

RECREATIONAL RESOURCES

1.2 Disruption of Recreational Activities (Significance of Short-term Recreation Impacts)

DEIR page D.9-10 through D.9-19

PG-269

Generally, impacts to recreation that are short-term, temporary disturbances should be classified as Class III impacts, rather than Class II, potentially significant. This is especially true for trails that will be spanned by the overhead portions of the project, bikeways in city streets that will be crossed by the underground portions and for which alternatives are readily available for the short construction duration, and other areas only briefly affected by construction activities. Some examples are given below.

Significance of Trail Impacts: Pages D.9-10 through D.9-13

Impacts for many of the trails that are crossed are termed potentially significant, even though work in the vicinity of any given trail, such as Sheep Camp Trail, is temporary and short-term in nature. Trail closures/reroutes would be for such a short duration if even required that they should not be considered significant.

Significance of Bikeway Impacts. Pages D.9-12 through D.9-17

Impacts to bikeways such as the Spruce Ave, Orange Street, and Carter Street bikeways, will experience only temporary, short-term impacts that should not be considered significant.

Pulgas Water Temple. Page D.2-1, D.2.1.1 Paragraph 2 line 5, Page D.9-11

States that the alignment is "passing by the utility's Pulgas Balancing Reservoir and Pulgas Water Temple." It should be noted that the Proposed Project is across the road and 1000 feet away for the nearest tower. It is highly unlikely that the facility would be exposed to dust, noise, or traffic that would "impair the recreational experience".

Bayshore Circle Park Herman Tot Lot. Page D.9-15

The impact analysis is inconsistent with impacts to the San Andreas Trail on page 31, which is 350 feet away, but for which impacts are considered less than significant. Impacts to the Bayshore Circle Park and Tot Lot should be called less than significant due to the distance (300 feet and 400 feet respectively) from the construction activity in an urban setting, the presence of intervening roadway, Huntington Avenue East, and topography.

1.3 Proposed Project—Southern Area (inconsistent impact classifications)

Page D.9-19, paragraphs 2

Impact R-3 Operation-Related Impacts

PG-270

Impact R-3 examples overlap significantly with the visual section, and comments in that section also apply here. It is not clear why recreation impacts from degradation of views, which are considered potentially significant Class II impacts for watershed lands, become Class I impacts in Edgewood Park, since the impacts are similar. Edgewood County Park and Preserve impacts should be a Class II impact, not a Class I.

Suggested revisions: keep classification of impacts to viewpoints at consistent levels. Change impacts to Edgewood County Park and Preserve from Class I to Class II.

Comment Set PG, Attachment A, cont.

RECREATIONAL RESOURCES

2. Specific Comments

2.1 Proposed Project—Northern Area

Page D.9-19, paragraph 1, bullet 3
Mitigation Measure R-2b

PG-271

“PG&E shall incorporate into the Proposed Project, any changes suggested by the Plan Operator.”

The third bullet in this mitigation measure states that PG&E shall incorporate into the project any changes suggested by the Plan Operator. This gives open discretionary authority to the Plan Operator, which is not appropriate. PG&E will comply with the HCP and coordinate with the Plan Operator but cannot be subject to all changes requested.

Suggested revisions: Bullet should be deleted.

2.2 Partial Underground Alternative: Environmental Impacts and Mitigation Measures.

PG-272

Page D.9-26, paragraph 1
Impact R-3 Operation-Related Impacts

“Operation of the Partial Underground Alternative would have impacts similar to those of the Proposed Project with two major exceptions. First, this alternative includes underground segments where the transmission line would not block or impair any views from recreational facilities, nor would it impede or block access to any recreation facilities or resources. Second, this alternative includes a reroute segment in which Towers 10/63 to 10/68 would be replaced with towers west of the I-280.”

This statement is misleading, in that it clearly implies that the proposed overhead lines significantly block or impair views from recreational facilities and impede access to recreational facilities in areas where the Partial Underground proposes undergrounding the line. However, in those areas where undergrounding is proposed, the project is not generally visible from recreational facilities, and no basis for the statement is provided.

If the impact to recreation for the proposed installation and removal of towers in Edgewood Park was considered a Class I impact, then the DEIR does not give adequate justification for why the impact of installing towers in a new corridor along the bikeway at Cañada Road should not also be a Class I impact.

Suggested revisions: Add language discussing the impacts to Cañada Road as impacts to a new corridor and therefore classified as a Class I impact.

3. Clarifications and Minor Comments

3.1 Clarification of Table Heading

DEIR Page D.9-2, Table D.9-1 through Table D.9-5

PG-273

SAC172750/RECREATIONAL RESOURCES.DOC

3

Comment Set PG, Attachment A, cont.

RECREATIONAL RESOURCES

Suggested revisions: Clarify what an “Indirect Connection” is, under the heading “Location with respect to Project Route.”

PG-273

3.2 Incorrect listing of APMs

DEIR Page D.9-9, Table D.9-6
APM 5.1, APM 5.10

“Not applicable to Recreation. See Section D.2, Land Use.”

Because PEA Chapter 5 covered Land use, Recreation, and Agricultural Resources, the proposed measures for all three subsections were listed together. Therefore, APM 5.1 and 5.10 were not intended to apply to recreation, as indicated by the DEIR.

Proposed revisions: Remove APM 5.1 and APM 5.10 from Table D.9-6.

PG-274

3.3 Disruption of Recreational Activities: Cypress Hills Golf Course

Page D.9-16

“Construction activities would degrade views to the south and west from the golf course, reducing the aesthetic value of the facility. Dust, noise and traffic associated with construction would also impair the recreational experience, but many impacts would be largely screened by trees on the course’s borders.”

The analysis for the Cypress Hills Golf Course states that trees on the course’s borders would screen dust, noise, and traffic impacts. If this is true, views discussed in the previous sentence as being degraded would also be screened.

Suggested revisions: Replace with “construction activities potential to degraded views to the south and west from the golf course would be less than significant due to the screening offered by the trees located along the perimeter of the course, and the distance and grade separation of the majority of the golf course from the road.”

PG-275

Responses to Comment Set PG – PG&E Attachment A: Recreational Resources

PG-268 While construction activities near schools would be best accomplished during weekends to minimize impacts to schools, the only location where this could conflict with avoiding weekend construction at recreation areas would be at John F. Kennedy elementary school adjacent to San Bruno Mountain State and County Park. Impacts to this location would last for only a few days and would be reduced to less than significant levels as discussed in APM 5.2, APM 5.9, and APM 5.11 described in Section D.2 (Land Use) of the DEIR.

For other locations, however, scheduling construction to avoid peak recreation uses during weekends and holidays is critical to ensuring that impacts to sensitive recreational users remain at less than significant levels. There are recreation areas, such as the Pulgas Water Temple, that are screened from the proposed construction sites, but are included in the list of recreational facilities where weekend and holiday work must be avoided. These locations have been included on the list due to the fact that construction activities in nearby areas would require the ingress and egress of equipment to construction sites along roads passing by sensitive recreation areas. In the case of the Pulgas Water Temple and other recreation areas near construction sites where helicopters would be involved in construction activities, although the construction site on the ground may be screened from the recreation area, helicopters flying overhead to perform construction work would not be screened and could constitute a significant disruption to recreational uses and a significant impact. If construction activities, particularly the helicopter construction, are to occur during weekends, these activities would result in significant, unavoidable impacts (Class I).

The commenter's description of the construction activities that would require weekend work does not seem limited to one or two events, but is in reference to regularly occurring construction activities. If construction activities in recreation areas were only to occur "whenever possible" avoiding weekends and holidays, then according to the comment, significant, (Class I) unavoidable impacts would also be occurring on a regular basis. It should be noted that, "whenever possible" is not acceptable or effective mitigation language. Therefore, Mitigation Measure R-2a (Avoidance of Peak Use Periods and On-Site Notification) remains unchanged.

PG-269 While it is common practice for impacts that are short-term and temporary disturbances to be categorized as less than significant (Class III) impacts, because recreational facilities are considered to be sensitive uses, short-term and temporary construction activities can significantly impact (Class I or II) these uses. Although trail or bikeway closures/reroutes would occur for only short periods, the noise and dust resulting from construction activities in the vicinity and views of construction equipment and activities can significantly degrade the recreational experience of facility users. By providing public notification and information of construction (Mitigation Measures L-4a and L-4b), preparing a traffic management plan (Mitigation Measure T-1a), scheduling construction to avoid peak use (Mitigation Measure R-2a), reducing the visibility of construction equipment and activities (Mitigation Measure V-1a), and providing continuous access to properties (Mitigation Measure L-7a), these impacts would be reduced to less than significant levels.

These Mitigation Measures are particularly appropriate for recreation areas which will be impacted by helicopter construction activities or areas that, although not adjacent to construction sites, are adjacent to routes that would be used by vehicles accessing the construction sites. This is the case both for the Pulgas Water Temple, as discussed above in the response to comment PG-268, as well as Bayshore Circle Park and the Herman Tot Lot. Although analysis for other recreation facilities located closer to construction sites has determined that construction impacts would be less than significant impacts, both the Bayshore Circle Park and the Herman Tot Lot are adjacent to routes that would be used by construction vehicles. Both uses are sensitive receptors, with each having dedicated play areas not only for children, but also for toddlers. As such, disturbances to these uses would be considered significant (Class II), and the mitigation described above is necessary to reduce these impacts to these uses to less than significant levels.

- PG-270 The quantity of vegetative screening and visual complexity differs greatly between Edgewood Park and the majority of recreation areas in Peninsula Watershed Lands/Golden Gate Recreation Area Easements. Many of the trails and recreation areas in the Peninsula Watershed Lands/Golden Gate Recreation Area Easements have vegetative screening between recreationists and transmission lines and towers. In areas of watershed lands where there is little screening, the transmission towers and lines are in visually complex areas where their forms are incorporated into the scenery. With its grassland hillsides, Edgewood Park has considerably less vegetative screening and visual complexity than the wooded Peninsula Watershed Lands. The impact of visual degradation on recreation is based on the change between the existing transmission facilities and the new proposed facilities. Due to the differences in screening and visual complexity between Edgewood Park and the Peninsula Watershed Lands, the same amount of visual change in a transmission facility would have a greater incremental impact to Edgewood Park recreation resources than it would to Peninsula Watershed resources. As such, the Proposed Project would result in significant, but mitigable (Class II) impacts to Peninsula Watershed Land recreation resources and significant, unmitigable (Class I) impacts to Edgewood Park recreation resources due to degradation of views by the project. Therefore, the text discussion for Impact R-3 (Operation-Related Impacts) remains unchanged.
- PG-271 The third bullet in Mitigation Measure R-2b (Construction Plan for San Bruno Mountain State and County Park) has been modified to require PG&E's consideration of changes suggested by the Plan Operator, and the provision of such suggestions to the CPUC for review and consideration. This measure was not intended to provide the Plan Operator with discretionary authority over PG&E.
- PG-272 Please see Responses to Comments PG-16 and PG-24.
- PG-273 "Indirect connection" indicates that while the recreation resource is not directly adjacent to, crossed, or intersected by the Proposed Project and alternatives, the resource is in the vicinity (within approximately ¼-mile) of the project and as such, could be indirectly impacted by project activities. Notes have been added to Tables D.9-2, D.9-3, D.9-4, and D.9-5 in Section D.9 (Recreation) to explain the "indirect connection" designation.
- PG-274 APM 5.1 and APM 5.10 have been removed from Table D.9-6 (Applicant Proposed Measures – Recreation) to reflect the comment that they do not apply to recreation.

PG-275 Although some views of the construction activity from the golf course would be screened, the trees along the borders do not fully screen views off of the golf course's grounds. Additionally, facility users would have views of the construction activities as they enter and leave the course. Mitigation Measure V-1a (Reduce visibility of construction activities and equipment) would still be required, along with Mitigation Measures R-2a (Avoid peak use periods and notify on-site), L-4a (Provide construction notification), L-4b (Provide public liaison person and toll-free information hotline), L-7a (Provide continuous access to properties), and T-1a (Prepare Transportation Management Plans), to reduce impacts to less than significant levels. The text referenced by the comment on Page D.9-16 of the DEIR remains unchanged.

Comment Set PG, Attachment A, cont.

Air Quality

1. General Comments

1.1 Proposed Mitigation Measures (Measures are not comparable)

DEIR page D.10-18, Table D.10-12

Mitigation measures should be separated as appropriate between underground and overhead construction methods. As written, it implies that impacts are comparable, with comparable mitigation measures. This is not the case. For example, augering holes for pole or tower foundations will have little or no noticeable or recordable air quality impact, yet these activities are implied as being comparable with trenching.

Also, this section simply refers to excavation, without distinguishing between trenching (underground construction) and augering (overhead), with the latter having little or no air quality impact. It also does not distinguish between the much greater air quality impacts associated with trenching through open ground as in the Partial Underground Alternative, compared to trenching through streets, where only the trench itself and not the entire work area would be producing dust. By associating all alternatives together, it implies the same mitigation measures are required for both which is not the case. For example, spoil piles from trenching and excavation for vaults (underground construction) will require substantially more dust control management than the minimal soil removed from the pole/tower holes (overhead).

Proposed revisions: Reorganize the table to distinguish between mitigation measures and construction methods.

2. Specific Comments

2.1 Mitigation Measure A-1a (wind gust, vegetation)

Page D.10-18, Table D.10-12

"The following BAAQMD PM10 control measures shall be implemented at construction sites within these areas:

- *Install windbreakers, or plant trees/vegetative windbreaks at windward side(s) of construction areas*
- *Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.*
- *Limit the area subject to excavation, grading and other construction activity at any one time."*

These measures are impractical and not consistent with the minimal impact and short-term, transient nature of most of the construction sites. They are clearly intended for large-scale,

PG-276

PG-277

Comment Set PG, Attachment A, cont.

AIR QUALITY

long-term development areas with expanses of graded or stripped soil and not for projects such as the Proposed Project that involve short-term, minimal disturbance at tower sites or trenching through already paved roads. Measures such as planting wind breaks are clearly meant to be applied to long-term, large-scale grading projects. This project has limited, generally short-term disturbance.

Augering holes for pole or tower foundations creates minimal dust which can be minimized if at all necessary on-site. This construction technique and project alternative should not be limited by this mitigation measure which is more applicable to the trenching activities of underground construction through open ground. The term excavation is used broadly and becomes inappropriate and constraining

The measures are impractical and not consistent with the minimal impact and short-term, transient nature of most of the construction sites. Standard dust control measures are adequate (e.g. application of water or substitute, minimize exposed piles, cover where necessary). Planting vegetation (digging) would presumably have its own dust impacts, and the number of trees and size (years of growth) and appropriateness of the vegetation at maturity make this mitigation impractical and unrealistic.

Further, the transient nature of the construction sites, and cost and effectiveness to install wind breakers make them impractical except at extremely localized, specialty sites to protect workers from wind-sensitive work, e.g. coating or welding. Because the project location is in an area which frequently experiences winds greater than 25 mph, a constant wind monitor would be necessary. In addition, wind speeds are nearly impossible to measure accurately. Because ground exposure will occur in focused areas for brief periods of time, this portion of the measure is impractical and should be removed.

Suggested revisions: Delete first and second bullets of Mitigation Measure A-1a.

2.2 A-2A: Control Exhaust Emissions

DEIR page D.10-19

The following measures shall be implemented to replace APM 14.3:

- *Construction workers will carpool when possible*
- *Vehicle idling time will be minimized (e.g., 5-minute maximum)*
- *Alternatively fueled construction equipment will be used where feasible*
- *Equipment will be properly tuned and maintained.*

PG&E shall document compliance with this measure by submitting an exhaust emission reduction plan to the CPUC for review and approval at least 60 days before the start of construction.

This measure contradicts BAAQMD CEQA Guidelines, Section 2.3, which state that "if all the control measures indicated in Table 2 of the Guidelines, as appropriate, will be implemented, then air pollutant emissions from construction activities would be deemed a less than significant impact." No further mitigation measures are necessary.

The CPUC requests that PG&E submit an exhaust emission reduction plan to them for review and approval. The plan "*shall define how and where records of equipment tuning and maintenance will be kept for CPUC review during construction.*" PG&E will comply

PG-277

PG-278

Comment Set PG, Attachment A, cont.

AIR QUALITY

with the regional air quality standards, and will have copies of project environmental training materials that will require workers to minimize emissions and duplicative regulatory oversight by the CPUC is unnecessary and burdensome.

Suggested revisions: No further mitigation measures are necessary in addition to APM 14.3 and should be deleted.

PG-278

Responses to Comment Set PG – PG&E Attachment A: Air Quality

PG-276 The air quality mitigation measures presented in the EIR reflect the recommendations of the BAAQMD, and the CPUC believes they are relevant to all construction sites and activities, including underground work sites, overhead work sites, and staging areas. These measures are applicable to overhead and underground construction activities in the Draft EIR as they were in the PEA. The BAAQMD recommendations depend more on the location and size of the work area, than the work method, and therefore do not need to be separated into special requirements for underground (trenching) or overhead work. The measures allow some discretion in their application, so PG&E would be able to appropriately manage the different scales of dust control needed for the different types of work areas.

To clarify the applicability of Mitigation Measure A-1a (Control Dust Emissions) to trenching and larger work areas, this Final EIR includes the following revisions to Mitigation Measure A-1a (p.D.10-9 and Table D.10-12):

A-1a APMs 14.1 and 14.2 shall be implemented at all construction sites. PG&E shall identify all areas of the approved route that are within 300 feet of residences, schools, convalescent facilities, and hospitals in a report submitted to the CPUC at least 60 days before construction. The following BAAQMD PM₁₀ control measures shall be implemented at construction sites within these areas:

- Install wind breakers, or plant trees/vegetative wind breaks at windward side(s) of construction staging or parking areas if activity at the staging or parking area causes persistent visible emissions of fugitive dust beyond the work area.
- Suspend excavation, trenching, and grading activity ~~when~~if winds ~~(instantaneous gusts)~~exceed 25 mph and the activity causes persistent visible emissions of fugitive dust beyond the work area.
- Limit the area subject to excavation, grading and other construction activity at any one time.

PG-277 Mitigation Measure A-1a reflects the BAAQMD recommendations for dust control near sensitive receptors, and the two recommendations that PG&E wishes to delete from the EIR would apply only to those areas that are near residences, schools, convalescent facilities, and hospitals. As such, the CPUC believes they are relevant and not impractical. Substantial portions the project route under any alternative would not be near such land uses. Additionally, almost all of the southern portion of the project route would be in sheltered areas, far from the San Bruno Gap, where high winds are less common.

To clarify the applicability of the dust control requirements, and to focus their implementation to the larger work areas and those that might have persistent dust problems or the highest potential to cause a nuisance, this Final EIR includes revisions to Mitigation Measure A-1a (identified in Response to Comment PG-276, above).

PG-278 Mitigation Measure A-2a (Control Exhaust Emissions) does not contradict the BAAQMD CEQA Guidelines because it would implement the recommendations for reducing emissions from construction equipment (on p. 53 of the December 1999 version of the guidelines). To demonstrate compliance with this measure, the CPUC developed the requirement for the exhaust emission reduction plan. The CPUC needs some means of ensuring that steps would be taken to encourage carpooling, minimize idling, and maintain the equipment. The CPUC understands that the plan would need to be flexible and that it would probably depend heavily on PG&E's proposed environmental training of construction personnel.

Comment Set PG, Attachment A, cont.

Visual Resources

1. General Comments

PG&E concurs with the Draft EIR's finding that the PG&E Underground Route Option 1B would result in a lesser degree of visual impact than would the proposed project. However, while we agree with the Draft EIR's conclusion regarding the visual effects associated with the PG&E Option 1B, we disagree with the Draft EIR's finding that the Proposed Project would have significant, unmitigable visual effects.

There are a number of inaccuracies and problems with the overall approach taken in the Draft EIR visual analysis of the proposed project. As noted below, these deficiencies and inaccuracies provide the Draft EIR reader with an exaggerated impression of the visual impacts associated with the proposed project.

1.1 The Draft EIR Visual Assessment Does Not Address CEQA Criteria for Significance

The Draft EIR states that it addresses the criteria found in the CEQA Guidelines for determining whether a project would have a significant visual effect. Importantly, the third CEQA criterion asks whether a substantial degradation of the existing visual character or quality of the site and its surroundings would occur. Yet, the Draft EIR does not provide an assessment of existing visual character and fails to properly account for the existing 60Kv transmission facilities. This includes the approximately 100 transmission towers/poles and more than 14 miles of overhead conductor as established landscape features that contribute to the visual character of the project setting. Nor does the Draft EIR assess the incremental extent to which the existing visual character would be altered by the proposed project.

The Draft EIR analytical outcome, "visual impact" is not clearly defined and does not appear to have been developed in a rigorous way that makes it meaningful in relationship to the need of the key CEQA guideline question to determine whether a project will "...substantially degrade the existing visual character or quality of the site and its surroundings". The process determines impact significance by combining a "high", "moderate", or "low" rating of "Overall Visual Sensitivity" with a "high", "moderate", or "low" rating of "Overall Visual Change". The logic of how the two sets of ratings are combined is not explained, and there is no definition of how the combined levels of sensitivity and visual change are believed to constitute a "significant" visual impact.

Table D.3-1 entitled "General Guidance for Review of Impact Significance" appears to provide a framework for the Draft EIR impact findings (Draft EIR, page D.3-20). Based on the text it is unclear whether this framework was developed specifically for purposes of the Jefferson-Martin Transmission Project Draft EIR visual impact analysis. Because no information is provided on where this table came from and what it is based on, there is a question as to whether the assumptions built into this table have been validated by empirical research. According to Table D.3-1, a clear case of significant visual impact requires a rating of at least a "high" rating of one and a "moderate to high" rating of the other overall

PG-279

SAC/172750

Comment Set PG, Attachment A, cont.

VISUAL RESOURCES

rankings. It should be noted that, of the 13 significant visual impacts identified in the Draft EIR, none meet these criteria.

The Draft EIR also asserts that “for a visual impact to be considered significant, two conditions generally exist: 1) the existing landscape is of reasonably high quality and is relatively valued by viewers and 2) the perceived incompatibility of one or more Proposed Project elements or characteristics tends toward the high extreme, leading to a substantial reduction in visual quality” (Draft EIR, page D.3-21). Based on this statement, the Draft EIR fails to make a clear case for finding significant visual impacts. In addition the Draft EIR does not provide a clear analytical connection between Table D.3-1 and this statement, as it applies to the Jefferson-Martin Transmission project Draft EIR visual analysis.

1.2 The Draft EIR Visual Analysis Procedures Are Not Well Documented and Are Applied Inconsistently

The Draft EIR analysis of visual resources is based upon an elaborate evaluation process to assess the significance of visual impacts. This process and the criteria it applies are described on pages D.3-1 and D.3-2 and D.3-19 through D.3-21 of the Draft EIR and the results are presented in text form in several places in the Visual Resources Chapter and in tabular form in Appendix VR-1. There are many problems with the approach and the visual impact analysis procedure applied in this case is seriously flawed. In addition to the questionable aspects of the overall analytical framework described above under Item 1.1, there are serious problems with the definition and treatment of the individual variables which are aggregated to develop the Draft EIR assessments of “visual sensitivity” and “visual change”.

A fundamental problem is that, despite its seeming complexity, the visual analysis procedure is not well documented. It is difficult to clearly understand what the procedure is actually determining, how the variables are rated, and what the ratings mean. Clear explanations as to how the ratings are combined, why the variables are combined in the way they are, how the combinations are translated into outcomes and what those outcomes actually mean is lacking.

One example is the variable titled “viewer concern.” In justifying the ratings of “viewer concern” it assigns, the Draft EIR analysis makes highly speculative statements about what viewers would expect to see in this landscape setting and how they would perceive project-related changes. Can data such as landscape perception studies carried out in comparable situations or surveys of residents and roadway travelers in the project area be provided to support these assertions? In the absence of supporting data this variable cannot be considered credible.

A further example of a problematic variable is “view blockage.” In its formulation of the project’s view blockage effects, the Draft EIR asserts that the increased height of the proposed lattice steel replacement towers at Edgewood Park would cause “additional skylining” and “would raise the conductors such that more of the ridgeline in the background could become visually obstructed.” Based on these factors, the Draft EIR concludes that “the proposed project’s resulting view blockage would be “moderate to high” (Draft EIR, page D.3-24). Similarly, when assessing impacts on I-280 views, the Draft EIR finds that the taller lattice steel replacement tower would result in “increased structure skylining” that would result in a “moderate to high degree of view blockage” (Draft EIR, page D.3-113). We must challenge the unexamined, underlying idea that preserving views of the sky is assumed to be

SAC/172750

2

PG-279

PG-280

Comment Set PG, Attachment A, cont.

VISUAL RESOURCES

an issue in this area. What criteria have been established to determine how much blockage of sky views, in what contexts, and for how much elapsed travel time would constitute “low,” “moderate,” and “high” levels of view blockage effect? Given their physical characteristics, one must also ask to what extent the proposed overhead conductors could actually obstruct views of anything.

Another concern involves the problems and inconsistencies associated with the Draft EIR’s evaluation of proposed increased structure size relative to identifying visual impacts. In assessing the project’s visual effect on Crystal Springs Rest Area views, the Draft EIR indicates that the visible replacement “structures would be larger by 21%, 24%, 19%, 18% and 27%, respectively” and that “a noticeable increase in the degree of structure prominence” would occur (Draft EIR, page D.3-81). The Draft EIR provides no explanation as to how the quantitative aspects of increased structure size relate specifically to an adverse impact. Does the Draft EIR presume that a specific degree of size increase represents a threshold for acceptable visual change? If so, a specific threshold is not identified and the basis for using a quantitative measurement as a threshold is not explained. A further problem arises when the Draft EIR applies another unexplained size increase threshold to its visual mitigation measures. For example Draft EIR Mitigation Measure V-10a involves the elimination of a tower which in turn requires increased conductor spans and taller towers to compensate. The Draft EIR states “If necessary, tower heights can be increased (up to 30% additional height) to facilitate longer span” (Draft EIR, page D.3-81). We note that a 30% increase is a greater increase in size than the increases associated with the proposed replacement structures. Why is a 30% increase in tower height an acceptable visual effect when the height increase involves an Draft EIR-recommended mitigation measure whereas height increases of smaller proportions associated with the replacement towers result in a significant visual impact?

1.3. Methods and Techniques Employed to Produce the Draft EIR Visual Simulations Are Not Documented

The visual resources analysis submitted as a part of the PEA included 18 simulations of views of the project. These simulations were prepared using systematic methods to assure a representative set of viewpoints and accuracy of the images. The procedures for creating the simulations were well documented in the PEA. We note that none of the simulations prepared for the PEA have been used or referred to in the Draft EIR. Instead, an entirely new set of simulations was prepared. Curiously, there is no review or evaluation of the simulations submitted with the PEA, and no rationale is presented as to why it was necessary to reject the PEA simulations and replace them with new ones.

The new simulations presented in the Draft EIR illustrate the appearance of the proposed project as seen from 18 selected vantage points. The Draft EIR contains no explanation of the methods, techniques and assumptions employed to produce these images. Provision of such an explanation is standard professional practice and is essential for providing a basis for assessing the validity of the simulations. For example, the type of camera equipment and focal length of the lens used to shoot the simulation photos is not provided. What lens (focal length) was used to shoot the simulation photos? Do all of the simulation photographs portray the same horizontal angle of view? Information describing the specific technical procedures such as computer modeling or rendering techniques is not provided. What procedures were employed to verify the accuracy of the simulation images in terms of the

PG-280

PG-281

SAC/172750

3

Comment Set PG, Attachment A, cont.

VISUAL RESOURCES

location, scale, and height of the project components? Information describing the technical data and assumptions that provide the technical basis for the simulations is also lacking. What engineering data such as dimensions for each of the project components was employed as the basis for the Draft EIR simulation images? Are PG&E's proposed visual mitigation measures reflected in the Draft EIR simulation images?

The omission of this critical information makes it difficult for Draft EIR readers and reviewers to assess the validity and accuracy of the visual simulations presented in the Draft EIR. This represents a serious problem because the basic purpose of the visual simulations is to document the visual change that would occur as a result of the project. The simulations should provide an accurate and reliable tool for assessing the visual impacts based on evaluation of the changes to the existing visual resources that would result from construction and operation of the project. While some of the visual simulation images appear reasonable, other Draft EIR simulations are inaccurate and misleading.

1.4 The Draft EIR Visual Simulations Are Inaccurate and Misleading

The following examples highlight the problems with the Draft EIR visual simulations.

Draft EIR Figures D.3-3A and D.3-3B portray a "before" and "after" view of the proposed project as seen from southbound I-280 near Edgewood County Park. While the existing view shows a landscape setting with golden brown-colored hillside terrain, the visual simulation portrays taller replacement towers in a landscape setting with rich, green-colored hillsides. The Draft EIR visual analysis does not acknowledge or explain the rationale for manipulating the appearance of the landscape setting in the visual simulation. Given the alteration of the setting photo, a comparison between the "before" and "after" images provides a misleading impression of visual effects. This problem raises serious questions about the validity of the Draft EIR simulations. In the case of this I-280 vantage point, we suggest that it is difficult to support a significant visual impact finding when the incremental change is portrayed in an inaccurate set of "before" and "after" images. Please refer to visual simulations included in the PEA as Figure 8-7.

Draft EIR Figure D.3-3C is another problematic image illustrating the southbound I-280 view. This view shows a visual "mitigation" measure, based on a photo showing the landscape setting with green-colored rolling grassland. As noted above, the "existing" view, presented as Draft EIR Figure D.3-3A, portrays a landscape setting with golden brown-colored hillsides. Given the alteration of the setting photo, a comparison between the "existing" and "mitigated project" images is misleading because the altered landscape setting portrayed in the simulation image conveys a different impression of visual character than does the existing photo image. In this respect, the simulation inaccurately portrays the incremental visual change that would result from the proposed project.

Draft EIR Figure D.3-19B (Attachment Visual A-1) portrays a simulation of the proposed transition station.; however, the location and scale of the proposed facility are shown incorrectly. Based on the layout plan and elevation information presented in DEIR Figure B-7a (page B-17), the scale of proposed structures shown in the simulation appears greatly exaggerated. For example, the DEIR simulation exaggerates the height of both the proposed dead-end structure and the masonry wall. The simulation also depicts an illegible white surface at the perimeter, along the site's San Bruno Avenue and Glenview Drive frontages.

PG-281

PG-282

Comment Set PG, Attachment A, cont.

VISUAL RESOURCES

The net effect of these inaccuracies is a simulation that overemphasizes the proposed transition station's size and its visibility.

Attachment Visual A-2a is a simulation we have prepared of the view from the same vantage point that represents the project as it would appear based on the design parameters that were submitted to the PUC as part of the PEA and included as DEIR Figure B-7a. As a comparison of this correct simulation with the erroneous simulation presented in the DEIR indicates, the transition station's elements would be set back further from the street, would appear smaller, and would be less cluttered appearing than the DEIR's simulation suggests. The Draft EIR's transition station simulation further misleads the reader by omitting the landscaping that is proposed as part of the Proposed Project. Draft EIR, Figure B-8 shows the Conceptual Landscape Design proposed for the Transition Station. Although conceptual, PG&E planners and engineers have reviewed the landscape plan for its technical feasibility and have incorporated it into the project. A visual simulation showing the project with the landscaping proposed as part of the project is provided as Attachment Visual A-2b. It is difficult to understand why the Draft EIR presents such an inaccurate representation of the facility's appearance, when data on the transition station's correct location on the site, layout, design, dimensions, and proposed landscaping were readily available. What is the Draft EIR's rationale for ignoring the aesthetic landscape treatment proposed in the PEA? Why has this image been presented without a clear explanation of how and why it does not represent the project design as submitted by the Applicant?

Figure 8-20 of the PEA, (Attachment Visual A-3) is a visual simulation showing the transition station with the landscape plan that has been proposed as a part of the project (September 20, 2002). Because it represents the view from Skyline Boulevard, which is a designated scenic route this view of the project as seen from Skyline Boulevard that was included in the PEA visual analysis can be considered more important than the view the DEIR used as the basis for its simulation. It should be noted that the Visual A-3 simulation includes landscaping shown on the conceptual plan, but does not show additional landscaping described on PEA page 8-120 as Mitigation 8.13, which would provide more extensive screening than what is shown.

1.5 The Draft EIR Fails to Analyze the Project with the Incorporation of Visual Mitigation Measures that Are Proposed as Part of the Project.

The Draft EIR states that the visual analysis assumes implementation of Applicant Proposed Mitigation measures (Draft EIR page D.3-21, D.3.3.2 Applicant Proposed Measures). Table D.3-2 on page D.3-22 and D.3-23 of the Draft EIR outlines the set of PG&E mitigation measures. However, rather than evaluating the project's potential visual effects with the incorporation of mitigation measures such as landscaping, the Draft EIR visual analysis appears to ignore these aspects of the project. For example refer to above discussion of the Draft EIR simulation presented as Figure D.3-19B. In the case of the Figure D.3-19B, a visual simulation of the transition station, a footnote reads "simulation does not show landscaping" and the Draft EIR concludes that there would be a significant visual impact. In light of the previous discussion and attached visual simulations, we find the Draft EIR's conclusion questionable.

Other examples of the Draft EIR's failure to analyze (and simulate) the project with incorporation of applicant's mitigation include:

SAC/172750

5

PG-282

PG-283

Comment Set PG, Attachment A, cont.

VISUAL RESOURCES

- Selective planting at Edgewood Park and Watershed lands to screen trail views (PEA Mitigation Measures 8.4 and 8.5)
- Selective planting on watershed lands to screen I-280 views (PEA Mitigation Measure 8.6)
- Skyline Boulevard landscaping (PEA Mitigation Measure 8.8)
- Selective planting at residential areas including Lexington Avenue and Black Mountain Road (PEA Mitigation Measures 8.10 and 8.11)
- Additional landscaping on the north and west sides of the transition station (PEA Mitigation Measure 8.13)
- Non-reflective, non-glare finish on towers/poles in Segment 1
- (PEA Mitigation Measure 8.15)

In all or most cases, the Draft EIR analysis finds significant visual impacts would occur.

1.6 The Draft EIR Visual Mitigation Measures Are Not Consistent with CEQA

According to Section 15041 of CEQA, the lead agency for a project has the authority to require feasible mitigation of "significant effects on the environment." Section 15041 further specifies that any changes to the project intended to avoid or lessen significant effects be consistent with applicable constitutional requirements such as the "nexus" and "rough proportionality" standards established by case law. In spite of CEQA's clear language on the subject of when mitigation can be required, the Draft EIR analysis imposes visual mitigation measures for effects that it finds to be "less than significant visual impacts" including the following:

- V-6a Tower Painting,
- V-8a Tower ReRoute,
- V-10a Tower Elimination, and
- V-19a Tower Elimination.

In addition, Draft EIR visual mitigation measures such as Measures V-8a and V-9, tower re-routing and Tower Elimination, may prove problematic in terms of their technical feasibility from an engineering standpoint (refer to Specific Comments 4.7 and 4.9 below). Further problems with the Draft EIR visual mitigations involve the lack of analysis regarding the impacts associated with its own visual mitigation recommendations including tower elimination and re-routing with respect to visual and biological resources as well as land use and consistency with plans and policies issues.

2. General Comment 2

2.1 Partial Underground Alternative

D. 3-160 to 162

PG-283

PG-284

PG-285