

# Comment Set H



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November 30, 2000

Mr. Brad Wetstone, CPUC  
 Aspen Environmental Group  
 235 Montgomery Street, Suite 800  
 San Francisco, CA 94104

Dear Mr. Wetstone:

Subject: Northeast San Jose Transmission Reinforcement Project Supplemental Draft Environmental Impact Report

The Santa Clara Valley Water District (District) has reviewed the Supplemental Draft Environmental Impact Report (SCH No. 2000042073) for Pacific Gas and Electric Company's (PG&E) Northeast San Jose Transmission Reinforcement Project, dated October 2000.

**SPECIFIC COMMENTS/CONCERNS**

**Figure B-5 McCarthy Boulevard Alternative Segment, Page 23**

MP 4.9 pole location for the proposed project and for this alternative may impact the District's levees and maintenance access. At any location, MP 4.9 pole location must be outside of District right of way. However, District staff does not support this alternative, since the biological impacts remain (per C.6.1 Biological Resources, page 46-47) which may compromise the District's ability to fulfill our mitigation goals with the various resource agencies.

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**Figure B-6 Southern Underground Alternative, Page 24**

District staff supports the Southern Underground Alternative, but with a slight revision. We suggest the MP4.9 pole site be relocated east of the Coyote River and south of McCarthy Boulevard to lessen the biological impacts, since this would move the facility farther away from the riparian corridor and 16.5-acre waterbird mitigation pond. The PG&E facility should then be underground from this location along McCarthy Boulevard. This suggested pole location is only slightly different than that proposed for McCarthy Boulevard alternative. Also, the Southern Underground Alternative must bore beneath Coyote Creek near MP 6.7. An overhead crossing at this location would require clearing of an approximately 100-foot wide swath across Coyote Creek to comply with safety requirements (per C.7.4 Land Use and Recreation, page 53). The removal of this vegetation is not acceptable to the District and will impact the prescribed flood protection project mitigation goals. District staff believes that a directional bore is feasible given the length and soil properties, since the District paid PG&E \$607,019 in 1993 to relocate approximately 1,000 feet (length of bore) of existing 24-inch gas transmission facility (Line 132) beneath Coyote Creek to avoid the proposed District's flood control improvements. This

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The mission of the Santa Clara Valley Water District is a healthy, safe and enhanced quality of living in Santa Clara County through the comprehensive management of water resources in a practical, cost-effective and environmentally sensitive manner.



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relocation was just upstream of this proposed southern underground crossing near Bellew Drive where soil conditions are similar.

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If an overhead crossing is selected for the southern crossing, relocating the overhead crossing of the creek approximately 1,000 feet downstream of Highway 237 would avoid impacts to the existing riparian corridor.

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**B.3.2 Southern Underground Alternative, Page 26**

The text incorrectly states that "there are no more designated overcrossings between Dixon Landing Road and Highway 237." The District's term for these crossings is crossover and there are three such crossovers between Dixon Landing Road and Highway 237.

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**Figure B-7 Generalized Cross Section of Underground Transmission Line, Page 28**

District staff recognizes the anticipated right of way needs of 30 feet to 50 feet in width for an underground facility. However, District staff also is aware PG&E would require 40-foot to 75-foot width for an overhead transmission facility depending on the span lengths. PG&E has required the District provide these widths for the recently relocated overhead transmission facilities from Coleman Avenue (Substation B) to Santa Clara Street along the Guadalupe River. The District paid PG&E nearly \$2 million to relocate their facilities along the Guadalupe River to avoid the proposed District flood protection project improvements; therefore, right of way costs to underground this proposed facility may actually be less than the right of way costs for a proposed overhead facility.

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**C.7.1 Biological Resources, Page 50**

"The overhead crossing of Coyote Creek (at Dixon Landing Road) would pose some bird collision risk, but the relatively short length of this span would not cause a significant impact. The impact would be less than significant (Class III)." District staff is not sure how this biological opinion is supported. Please explain in more detail why this overhead crossing would not be considered a significant impact. Also, more detail is needed on how PG&E proposes to mitigate for proposed clearing of an approximately 100-foot wide swath across existing Coyote Creek at the southern end of this alternative route with an overhead crossing. Mitigation ratios as high as 4:1 are not uncommon. Therefore, District staff supports the Southern Underground Alternative with a revised MP 4.9 pole location and a directional bore beneath existing Coyote Creek near MP 6.7 at the southern end of this route.

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**C.7.8 Conclusion, Page 54**

District staff does not support this conclusion. District/PG&E completed a directional bore immediately upstream beneath Coyote Creek where the soil conditions are very similar. District staff believes soil conditions should be a concern, but not justification for not selecting the Southern Underground Alternative. District staff believes the impacts to the biological resources and recreation uses should be a greater concern. There are several engineering solutions for poor soil conditions, but no solutions to eliminate the impacts to the biological resources and recreation

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uses. In addition the text cites impacts to land use, transportation, and recreation yet the impacts described are temporarily occurring during construction. The magnitude of people coping with construction impacts of an underground alignment portrayed in the document is out of balance with the long-term biological and recreational impacts associated with overhead lines.

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### C.9.2 Bird Collision Impact, Page 64

The reference to the Coyote Creek Flood Control Basin should be changed to Coyote Creek Flood Protection Facility. The creek is not a basin.

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### C.9.2.2 Project-Specific Mitigation for Bird Collision, Page 68-69

Please add the District to the list of agencies that would be provided the annual reports on bird strike data even though the District does not support overhead transmission facilities within and adjacent to existing District mitigation sites.

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### Table D-1 Summary of Conclusions Regarding New Analysis, Page 71

District staff does not agree with the written justification as to why the Southern Underground Alternative is not the Preferred Alternative.

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### D.2.3 Southern Area Alternatives, Page 74

District staff does not agree with the written justification as to why the Southern Underground Alternative is not the Preferred Alternative.

### Table D-4 Comparison of Most Significant Impacts: Southern Area, Page 75

District staff does not agree with the Class I assessment for the geology and soils impacts listed. Why are there two separate geology and soils impacts listed in this table that state the very same thing or is this an attempt to make the geology and soil impacts appear equal or more important than the biological resources and land use impacts?

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### D.3 Environmentally Superior Route, Page 75

For the southern area bullet, the Supplemental Draft Environmental Impact Report (EIR) states, "The proposed route with the McCarthy Boulevard Alternative segment is environmentally superior to the proposed route and the Southern Underground Alternative." This statement is untrue and must be revised. According to Table D-4 and all the previous text, the Southern Underground Alternative is the environmentally superior route. Therefore, District staff believes that it should be the Preferred Alternative.

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District staff is very conscious about our commitments and responsibilities with the resource agencies and take these commitments and responsibilities seriously. As a result of the flood protection improvements, the District has installed various mitigation sites that are finally documented in this Supplemental Draft EIR. District staff believes that any route that is selected must avoid or have very

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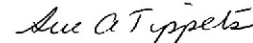
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minimal impacts to these existing District mitigation sites. Therefore, the Southern Underground Alternative is the only route acceptable to the District and should be the project's Preferred Alternative.

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Thank you for the opportunity to provide comments on this proposed project. I can be reached by phone at (408) 265-2607, extension 2253, or email at [suetipp@scvwd.dst.ca.us](mailto:suetipp@scvwd.dst.ca.us).

Sincerely,



Sue A. Tippetts, P.E.  
Engineering Unit Manger  
Community Projects Review Unit