

Comment Set L



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- Regional Water Quality Control Board, San Francisco Bay Region
- San Francisco Estuary Project
- Save San Francisco Bay Association
- Sierra Club
- The Bay Institute
- The Conservation Fund
- Urban Creeks Council
- U.S. Army Corps of Engineers
- U.S. Fish & Wildlife Service
- Wildlife Conservation Board

October 31, 2000

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

RE: Transmission Lines, Wildlife and Habitat Goals

Dear California Public Utilities Commission:

It has recently come to the attention of the San Francisco Bay Joint Venture that additional power lines by Pacific Gas and Electric (PG&E) might be erected along and through wetlands ringing the south San Francisco Bay by way of the Northeast San Jose Transmission Reinforcement Project. While we recognize the need for increased supply of energy and communication lines for the expanding demands of the Bay Area, we believe that the placement and positions of power lines and communication towers should be carefully considered.

The San Francisco Bay Joint Venture (SFBJV) is a collaborative forum of twenty seven public agencies, environmental organizations, business groups (including PG&E), and agricultural interests working cooperatively to protect, restore, increase and enhance wetlands, riparian habitat and associated uplands throughout the San Francisco Bay Region. In short, we are a partnership for wetlands and wildlife, working around the Nation's second largest estuary. Particularly for waterbirds, the San Francisco Bay is one of the premier wetland complexes of North America. For shorebirds, the Bay has been declared a site of "Hemispheric Importance" by the Western Hemisphere Shorebird Reserve Network, its highest rank. It is one of only 8 such sites in North America, hosting up to one million shorebirds on a single day (Harrington and Perry 1995). Its importance to ducks, particularly diving ducks and sea ducks is equally impressive, with 56% of diving ducks of the Pacific Flyway and close to 90% of scoter and scaup (two species of sea ducks) calling the Bay home during the Winter 1999 survey (Vicencio 1999).

Our concerns lie with the possibility that new power lines will be laid out above ground along existing and new paths through existing wetlands and those proposed for restoration that rim the San Francisco Bay. We believe this will have detrimental effects on wildlife dependent on them. It is well known that communication towers and elevated power lines can have deadly effects on bird populations. The American Bird Conservancy just published a report on the hazard of communication towers to birds, and they documented in 47 studies conducted since 1949 the killing of over 545,000 birds of 230 species (Shire et al. 2000). Kills of birds at single sites have ranged up to 10,000 birds in a matter of days. Of larger bird species, waterfowl are most likely to die from collision with towers. While not as well documented, power lines can be equally dangerous to waterbirds. Biologists from the SF Bay Bird Observatory and the Point Reyes Bird Observatory have observed dead, decapitated shorebirds under power lines and larger shorebirds such as American Avocets, entangled in power lines at sites in south San Francisco Bay. Power lines located between roosting and feeding sites are known to be particularly dangerous to waterbirds (Bevanger 1994, Savereno et al. 1996).

Many towers exist already in bayside habitats, and when footed in marshes, require boardwalks through the wetlands. Such wetlands create easy access to the marsh for

mammalian predators such as the red fox, a species implicated in the decline of the endangered California Clapper Rail. In addition, the towers based in salt ponds can pose challenges for restoration to salt marsh if the bases need to be elevated to withstand tidal action. Such retrofits are expensive and determining how costs will be born can prove problematic, incurring increased expense and delay to completion of restoration projects, as occurred with Ora Loma Marsh in Hayward. There are many wetland restoration and protection projects underway or under consideration throughout the SF Bay Estuary, as shown in the enclosed map of SFBJV Habitat Projects. Perhaps chief among them is the proposed sale of Cargill salt ponds for wetlands enhancement and restoration.

In view of these several factors, we would like to advise that you encourage PG&E to explore ways to reduce the use of elevated wires and towers around the Bay over time. As we all have an interest in improving the health of our Bay, and particularly as SFBJV's partners have agreed to habitat goals of restoring 16,000 acres of wetlands in the South Bay (and enhancing another 42,000 acres), we recommend that PG&E explore ways to bury existing lines whenever possible, and remove communication towers from sensitive bay habitats. Finally, we recommend that PG&E embark on a long-term planning process that will include re-routing lines away from the baylands, as well as consolidating their footprint in our wetlands.

We thank you for this opportunity for bringing this important matter to your attention. Please feel free to contact us if you have questions or comments about our recommendations. We stand ready to assist PG&E in convening consultation with municipal, scientific, and organizational stakeholders to find an effective means of reducing the aforementioned wildlife conflicts. We look forward to working with you to resolve this serious concern in a manner that meets our common interests.

Sincerely Yours,

John Steere
Director

Notes:

- Bevanger, K. 1994. Bird interactions with utility structures: collision and electrocution, causes and mitigating effects. *Ibis* 136:412-425.
- Harrington, B., and E. Perry. 1995. Important shorebird staging sites meeting Western Hemisphere Shorebird reserve Network criteria in the United States. Report for the U.S. Fish and Wildlife Service, Washington, DC.
- Savereno, A. J., L. A. Savereno, R. Boettcher, S. M. Haig. 1996. Avian behavior and mortality at power lines in coastal South Carolina. *Wildlife Society Bulletin* 24:636-648.
- Shire, G. G., K. Brown, and G. Winegrad. 2000. *Communication towers: a deadly hazard to birds.* Report by American Bird Conservancy, Washington, DC.
- Vicencio, Louise, 1999 (US Fish and Wildlife Service) in *Restoring the Estuary, an Implementation Strategy for the San Francisco Bay Joint Venture*, to be published, December 2000, Oakland, CA

Co: SFBJV Board of Directors

ATTACHMENT

Request letters power-lines.let

L-1

L-2

L-3

L-4

L-4

L-5

Comment Set L, page 2

San Francisco Bay Joint Venture

What's so special about the San Francisco Bay Joint Venture?

The San Francisco Bay Joint Venture is the smallest in size of the North American Waterfowl Management Plans family of joint ventures. Its boundaries circumscribe a major metropolitan area that surrounds a major body of water, which is associated with habitat critical to migratory birds and resident wildlife.

Historically, the Bay was ringed by roughly 190,000 acres of tidal marsh, 50,000 acres of tidal flats, 85,000 acres of seasonal wetlands and associated uplands, and over 69,000 acres of riparian habitat. Today, all that remains are 40,000 acres of tidal marsh and a mere 2,500 acres of riparian habitat. Over the years, migratory bird populations have been squeezed into smaller areas and degraded habitats, placing some populations at risk.

- According to 1999 surveys, San Francisco Bay held 85% of California's wintering populations of scaup, 89% of scoter, and 70% of canvasback.
- More than 56% of the State's wintering diving ducks were located in the Bay's habitats in 1999.
- Seasonal shorebird surveys in the Bay Area have indicated as many as 396,000 birds in the fall, 343,000 in the winter, and 838,000 in the spring.
- Bay Area wetlands are home to 48 species that are either listed or are candidates for listing under the Endangered Species Act.

What are the Joint Venture's habitat goals?

- Partners will protect 63,000 acres, restore 37,000 acres, and enhance another 35,000 acres of the Bay's tidal flats, marshes, and lagoons.
- Partners will protect 37,000 acres of seasonal wetlands.
- Partners will restore and/or enhance 30,000 acres of seasonal wetlands.
- Partners will restore and/or enhance approximately 1,000 miles of creeks.

What's been accomplished?

- Since signing of the Joint Venture's working agreement in 1996, 22 wetland protection, restoration, or enhancement projects have been completed.
- Some 14,000 acres of habitat have been conserved.
- The conservation of about 16,200 acres is in progress.



San Francisco Bay Joint Venture Management Board

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- Ms. Loreta Barsaman, Executive Officer
Regional Water Quality Control Board
- Ms. Marcia Brockbank, Program Manager
San Francisco Estuary Project
- Ms. Ellic Cohen, Executive Director
Point Reyes Bird Observatory
- Mr. Grant Davis, Executive Director
The Bay Institute
- Mr. Chris Ellis, Land Projects Specialist
Pacific Gas & Electric
- Mr. Arthur Feinstein, Executive Director
Citizens Committee to Complete the Refuge
- Lt. Colonel Peter Grass, District Engineer
U.S. Army Corps of Engineers
- Mr. Eric Hammerling, Program Director
National Fish and Wildlife Foundation
- Mr. Tot Hefflinger, Chair, Wetlands Committee
Sierra Club
- Ms. Beth Huning, Director of Education
National Audubon Society
- Ms. Ellen Johnck, Director
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- Mr. Paul Jones, Senior Biologist
Environmental Protection Agency
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California Department Fish and Game
- Mr. John Woodbury, Director
Bay Area Open Space Council



North American Waterfowl Management Plan
Plan nord-américain de gestion de la sauvagine
Plan de Manejo de Aves Acuáticas de Norteamérica

The continued economic growth of the San Francisco Bay Area, while designed to avoid significant environmental impacts, has put tremendous pressure on all undeveloped lands, including wetlands, and just as importantly, former wetlands that could be restored. Those wetlands that remain are jeopardized by continuing incremental impacts and by declining water quality due to polluted storm-water runoff, the loss of adjacent uplands to development, and water diversions (up to 70% of freshwater flowing into the estuary is diverted). San Francisco Bay Joint Venture partners must work with a variety of urban interests to conserve habitats needed by both wildlife and people.



Comment Set L, page 3

Oro Loma Marsh Restoration Project Partners

East Bay Regional Parks District
 California Department of Fish and Game
 State Wildlife Conservation Board
 State Department of Parks and Recreation
 U.S. Fish and Wildlife Service
 Coastal Conservancy
 Oro Loma Sanitary District
 Golden Gate Audubon Society
 KRDC, Inc.
 City of Hayward



Who's been involved?

To successfully reach its habitat conservation goals in a major metropolitan setting, the Joint Venture partnership has had to work with all who have an interest in wetlands, even with those who, at first glance, might appear to be adverse to its goals. The Joint Venture's diverse management board and the project profiles described below demonstrate that where others might have seen obstacles, the Joint Venture saw, instead, possibilities.

Oro Loma Marsh Restoration Project

Diked and drained for farming and salt production during the late 19th century, the waters of San Francisco Bay reclaimed the Oro Loma Marsh when tidal action forced the Bay's waters through a breached levee onto the seasonal wetland. Within hours of the breach, the marsh teemed with hundreds of waterfowl and shorebirds feeding on small vertebrates and insects forced from their cover by the water. Partners' efforts also provided habitat for the Federally listed endangered Salt Harvest Mouse, California Clapper Rail, California Least Tern, and Western Snowy Plover.

Partners retained a public access corridor to provide wildlife viewing and environmental education opportunities for the public, and they will be managing the wetlands for mosquito control (a community concern) through flooding regimes that coincide with the insect's breeding cycle.

Partners raised \$6.4 million for the acquisition of 360 acres of degraded marsh and \$1.5 million for restoration. A \$200,000 North American Wetlands Conservation Act grant supported their efforts.

Hamilton Wetlands Restoration Project Partners

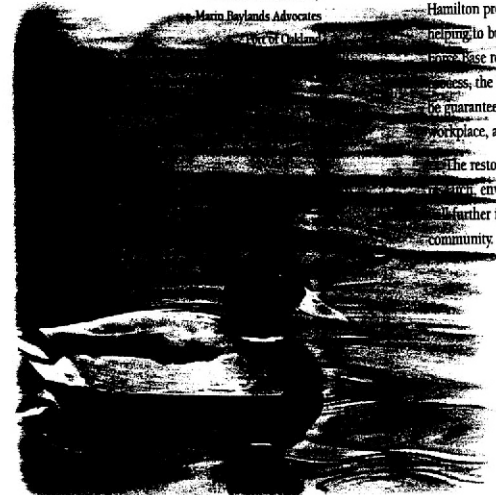
National Oceanic and Atmospheric Administration
 U.S. Geological Survey
 U.S. Army Corps of Engineers
 Environmental Protection Agency
 National Marine Fisheries Service
 U.S. Army
 San Francisco Bay Conservation and Development Commission
 California Department of Fish and Game
 California State Lands Commission
 Regional Water Quality Control Board
 Save San Francisco Bay Association
 Marin Audubon Society
 Marin Wetlands Advocates

Hamilton Wetlands Restoration Project

At the end of the multi-year Hamilton Wetlands Restoration Project, partners will have created a diverse wetlands system at the former Hamilton Air Force Base in Marin County, California. Begun in 1996, the project represents one of the Nation's largest and most ambitious habitat projects in an urban area. Partners will restore an area to tidal marsh that had long been diked for use as hay fields. Total costs for restoration and site preparation are estimated at \$55 million.

From a wildlife perspective, the project will provide habitat for many species of shorebirds, waterfowl, fish, and at least two endangered species. The wetland restoration effort is also integral to a new community being built. The Hamilton project served to unify disparate stakeholders, helping to build public consensus for the Hamilton Air Force Base reuse plan. Through this unique public process, the long-term conservation of a wildlife area will be guaranteed by a plan designed to balance residential, workplace, and habitat needs.

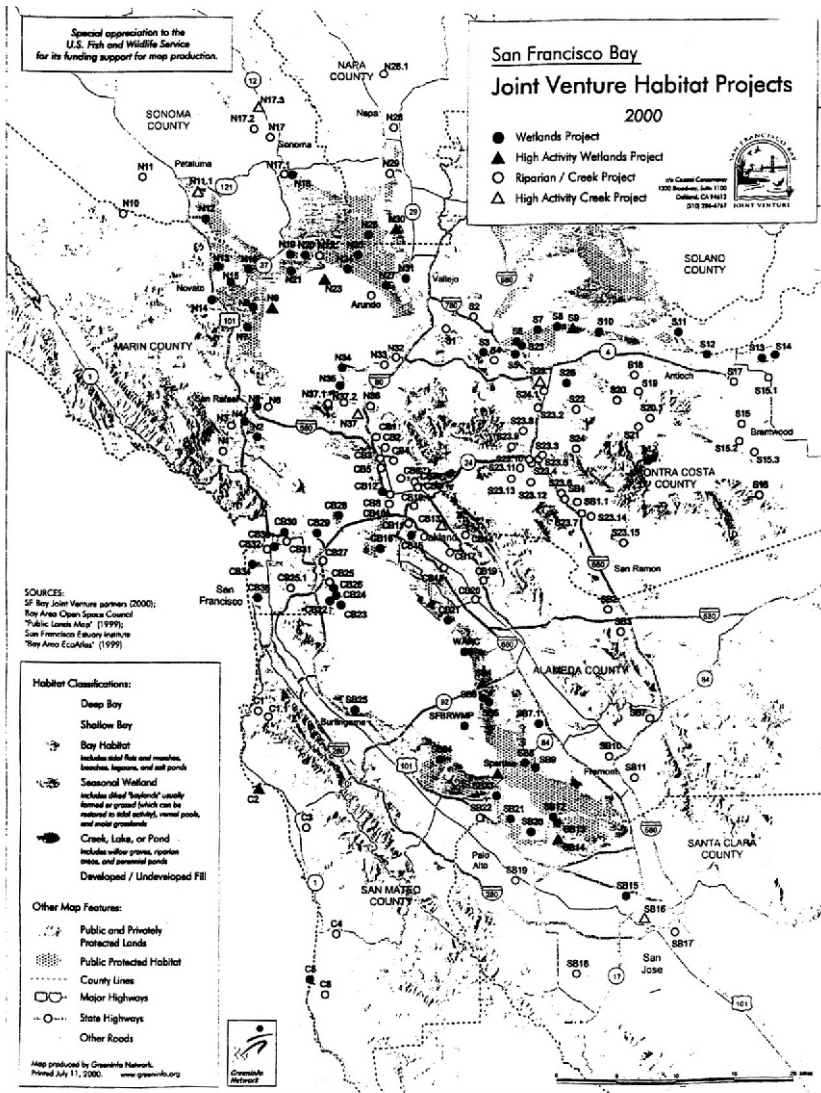
The restored site will support multiple public uses—environmental education, and recreation—which will further integrate the marsh into the fabric of the community.



San Francisco Bay Joint Venture

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Comment Set L, page 4



Key to San Francisco Bay Joint Venture Habitat Projects (by Subregion)

North Bay (NB)		Central Bay (CB)			
ID	Habitat Project Name	Acres	ID	Habitat Project Name	Acres
N1	Arroyo Corte Madera (Mill Valley)	4	CB1	Sacker Creek	7
N2	Triangle Marsh - Corte Madera	31	CB2	Carrizo Creek	2
N3	Corte Madera Creek	NS	CB3	Willage Creek	NS
N4	Madera Bay Park	5	CB4	Codomoles Creek	5
N5	Canalways (San Rafael)	85	CB5	Schoolhouse Creek	NS
N6	North Bay Riparian Station	NA	CB6	Strawberry Creek	NS
N7	Harrison Wetlands Restoration	900	CB7	Dirby Creek	NS
N8	San Pablo Bay MWR Expansion (among sites are Bahia and Silveira Ranch)	1,800	CB8	Potter Creek	NS
N9	San Pablo Bay MWR Expansion (among sites are Bahia and Silveira Ranch)	8,000	CB9	Clamson Creek	NS
N10	San Antonio Creek - George Goggins Project	NS	CB10	Ternwood Creek - Emeryville	NS
N11	Petaluma River Watershed Plan	NS	CB11	Terraconal Creek - Oakland	NS
N11.1	Petaluma River	NS	CB12	Eastshore State Park	100
N12	Petaluma Marsh Expansion	190	CB13	Sausal Creek	NS
N13	Rush Creek/Carnatey Marsh Enhancement	300	CB14	Lacota Creek	NS
N14	Scottsdale Marsh	41	CB15	Lake Merritt	NA
N15	Parrots at Olive and Atherton Avenues	144	CB16	Alameda Naval Air Station	565
N16	North Branch	420	CB17	Couillard Creek	NS
N17	Sonoma Creek Watershed Plan	NA	CB18	Arroyo Viejo Creek	NS
N17.1	Schaffville Restoration and Flood Control Proj.	NS	CB19	San Leandro Creek	NS
N17.2	Carpenter Creek	NS	CB20	San Lorenzo Creek	NS
N17.3	Sonoma Creek (Various Sites)	NS	CB21	Oyster Bay	90
N18	Camp Two	808	CB22	Yosemite Creek - Candlestick Point	25
N19	Tully Creek	435	CB23	Bayview Hunters Point Shipyard	18
N20	Lower Tubbs Island Restoration	72	CB24	India Beach - West and East	3.4
N21	Tubbs Island Expansion	NA	CB25	Yosemite Creek - Yosemite Creek	NS
N22	San Pablo Bay Watershed Study	NA	CB26	Yosemite Creek - San Canyon	NS
N23	San Pablo Bay North American Wetland Conservation Act Grant Sites	13,874	CB27	Pier 54 North	4
N24	Partners for the San Pablo Baylands Cullinan Ranch	1,500	CB27	Mission Creek - San Francisco	NS
N25	Neap/Sonoma Marsh Restoration	2,162	CB28	Treasure Island	40
N26	Marsh Island and North Bay Discovery Center	NA	CB29	SF Bay and Delta Estuary Center at Pier 45	20
N27	Neas River Watershed Plan	NS	CB30	Creeley Field	NA
N28	Neas River Watershed Plan	NS	CB31	Tennessee Hollow	NS
N28.1	Neas River Habitat Assessment	NS	CB32	Lubbock	NS
N29	Wildcat Creek Watershed	175	CB33	Mountain Lake	1
N30	Wildcat Creek - San Pablo	NS	CB34	Golden Gate Park Lakes	4
N31	Lower Wildcat Creek	NS	CB35	Lake Alvarado	12
N32	River Park	48			
N33	Philo Creek	NS			
N34	Point Pinole Wetlands Enhancement	400			
N35	San Pablo Bay Wetlands Restoration	103			
N36	San Pablo Creek	NS			
N37	Wildcat Creek Watershed	175			
N37.1	Wildcat Creek - San Pablo	NS			
N37.2	Lower Wildcat Creek	NS			
Suburban (SB)		South Bay (SB)			
ID	Habitat Project Name	Acres	ID	Habitat Project Name	Acres
S1	Elkhorn Creek Habitat Restoration	2	SB1	Alamo Creek - Danville	NS
S2	Berinda Creek and Wetland	4	SB1.1	Alamo Creek - San Ramon	NS
S3	Maritime Regional Shoreline Marsh Restoration	100	SB2	North Canyon Creek	8
S4	Alvarado Creek Watershed Plan	NA	SB3	Tahara Creek	16
S5	McNabney (Shaw) Marsh	200	SB4	Olive Property	324
S6	Pacheco Marsh	140	SB5	Whit's Tail	49
S7	Point Edith Wetlands Project	2,000	SB6	Eden Landing Ecological Reserve	836
S8	Concord NWB Wetlands Restoration	700*	SB7	Southern Alameda Creek Watershed Plan	NA
S9	North Contra Costa County Shoreline Bay Point Restoration Project	150	SB7.1	Alameda Creek Restoration	NS
S10	Delta Channel Islands	NS	SB8	Triangle Marsh - Newark	3
S11	Julia Cotti Freeman Wetland Preserve	8	SB9	Mayhew Landing	108
S12	Delta Balance Center Wetland Restoration	1,000	SB10	Laguna Creek Restoration	NS
S13	Big Break Acquisition	1,500	SB11	Mission Creek	NS
S14	Marsh Creek Restoration Master Plan	NA	SB12	Don Edwards SF Bay MWR	NS
S15	Lower Marsh Creek - Calaver	NS	SB13	New Chicago Marsh	450
S15.2	Upper Marsh Creek - Brentwood	7	SB14	Krapp Tract	40
S16	Kilgus Creek	NS	SB15	Coyote Creek	NS
S17	East Antioch Creek	NS	SB16	Lower Guadalupe River	NS
S18	Ritter Creek	NS	SB17	Eulach Preserve	40
S19	Mt. Diablo and Galindo Creeks	NS	SB18	Lower Guadalupe River	NS
S20	Mt. Diablo Creek	NS	SB19	Savanna Creek	NS
S20.1	Lower Mt. Diablo Creek	4	SB20	Cargill Salt Enhancement	NS
S21	Mitchell Creek	4	SB21	Palo Alto Harbor Point	7.2
S22	Walnut Creek - Pacheco Blough	NS	SB22	San Francisco Creek CRMP	NA
S23	Lower Walnut Creek Restoration	NS	SB23	Riverwood Preserve	200
S23.1	Walnut Creek - Pleasant Hill	NS	SB24	Bair Island	1,800
S23.2	Walnut Creek - Walnut Creek	NS	SB25	Burlingame Waterfront Park	8.8
S23.3	The CDFRWMP	NS			
S23.4	San Ramon Creek - Walnut Creek	NS			
S23.5	San Ramon Creek - Alamo	NS			
S23.6	San Ramon Creek - Danville	NS			
S23.7	Grayson Creek	NS			
S23.8	Lafayette Creek	NS			
S23.9	Last Trampas Creek - Walnut Creek	NS			
S23.10	Last Trampas Creek - Lafayette	NS			
S23.11	Grizzly Creek	NS			
S23.12	Old Jose Mill Creek	NS			
S23.13	Green Valley Creek	NS			
S23.14	Sycamore Creek	NS			
S23.15	Pine Creek	NS			
S24	Lower Pine Creek	NS			
S24.1	Chuppon Preserve Wetlands Restoration	NS			
S25					

NA = Not Applicable, NS = Not Specified
 * 700 acres in 68 sq. miles of 87 acres.

NOTES:
 1. Projects are numbered according to their subregion within the SF Bay Joint Venture geographic scope and are generally arranged in a clockwise direction.
 2. Habitat projects include acquisition, enhancement, and restoration, and include watershed planning initiatives and regional ecological education facilities.
 3. Multiple creek-based projects within the same watershed are noted by sequential points after the whole number.
 4. Project points in the bay refer to projects with multiple sites or that are regional in nature.